

Trigger Text	Code(s)	Full Comment Text	Form Letter/Document ID
Use the "preemption clause" of the U.S. Constitution to protect the iconic Yellowstone grizzly bears, overruling state and local laws that would put the grizzly bears at risk.	Comments on concurrent documents	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Use the "preemption clause" of the U.S. Constitution to protect the iconic Yellowstone grizzly bears, overruling state and local laws that would put the grizzly bears at risk. Isolated populations of any species are doomed to eventual extinction due to lack of genetic diversity. The grizzly bears must be allowed to roam without risk to their lives. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD
Since state don't have regulations in place to manage grizzly bears - why would their protection be taken away?	Comments on concurrent documents	Since state don't have regulations in place to manage grizzly bears - why would their protection be taken away? Do hunters truly have THAT much influence? NO MORE TROPHY HUNTS! Already too many species are being eradicated so that hunters can kill them & making it easier for ranchers to be careless about their cattle & sheep! This plan is a setback - do the right thing for these animals!	CBD
If you do insist on delisting this endangered species, many more safeguards must be put forth in your plan so they don't suffer more at the hands of humans as they will always need conservation protection	Comments on concurrent documents	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope"they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. If you do insist on delisting this endangered species, many more safeguards must be put forth in your plan so they don't suffer more at the hands of humans as they will always need conservation protection. Grizzly bears are an iconic animal in West"they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition
Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders and fully address their concerns.	Comments on concurrent documents	Take the following steps before finalizing it: Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries on park-adjacent lands and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior and how your proposal takes these changes into account. Provide the public with a clear and detailed plan for how grizzlies will be managed and protected and for how their long term conservation will be assured once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals.	NPCA

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We do not understand how a climate that is changing will affect the bear population in this area .	103			Data doubts and comments on process	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. We do not understand how a climate that is changing will affect the bear population in this area. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. This is an iconic animal in the American landscape, now limited to very small areas of its former range. - - Sincerely,	CBD	
Corridors must be developed and then maintained long enough to document successful dispersal and reproduction by bears into and out of the GYE, and then delisting would be justified	103			Data doubts and comments on process	I am writing to urge you to maintain federal ESA listing for grizzly bears in the Greater Yellowstone Ecosystem (GYE) -- a high-profile population that we as a nation have invested in since 1975. The FWS estimates a GYE grizzly population of about 700 animals, but this is the census size (N). The science of conservation genetics (in which I have some expertise) tell us that the most important number is not N, but rather the "effective population size" (Ne) - basically the number of individuals that successfully reproduce each generation. Depending on the sex ratio and age structure of sexually mature individuals, the number of breeding adults will be LOWER to FAR LOWER than the census size, and in terms of genetic health and long-term viability of a population, THIS IS WHAT COUNTS. (We have learned this the hard way with the Florida Cougar!). Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. - - Despite positive demographic trends since ESA listing of the GYE grizzlies, this population remains severely isolated, which will jeopardize the long-term viability of this population until some connectivity can be established with other populations. Without some assurance that surrounding states can protect bears that attempt to disperse, should ESA restrictions be lifted, this listing should be maintained. Artificially moving GYE bears to other populations (Northern Rockies) and vice-versa may be necessary in the short term, but this amounts to "ecologically baby-sitting" and is not a long term strategy. Corridors must be developed and then maintained long enough to document successful dispersal and reproduction by bears into and out of the GYE, and then delisting would be justified. I hope you will reconsider the delisting proposal and keep the GYE bears protected until they can become part of a larger meta-population group. - - Sincerely,	CBD	
All requests impacting our wildlife must now include how global warming will be changing the area	102	103	101	Data doubts and comments on process	I urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem. - - All requests impacting our wildlife must now include how global warming will be changing the area. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
Taxpayers whose dollars supported the effort to ensure their survival have a financial stake in this program	105			Data doubts and comments on process Delisting	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€”they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in Westâ€”they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Taxpayers whose dollars supported the effort to ensure their survival have a financial stake in this program. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	

As a native Montanan, this is an issue I feel very strongly about. I attended the hearing in Bozeman and agree with those expressing frustration at the inadequate and flawed process for public participation. Two hearings and 60 days to comment is shameful for such an important decision. Please slow down the process and provide more opportunity for citizens to voice their concerns and add input.	105			Data doubts and comments on process	Please accept my comments on the proposed delisting rule. As a native Montanan, this is an issue I feel very strongly about. I attended the hearing in Bozeman and agree with those expressing frustration at the inadequate and flawed process for public participation. Two hearings and 60 days to comment is shameful for such an important decision. Please slow down the process and provide more opportunity for citizens to voice their concerns and add input. Given that the Greater Yellowstone ecosystem is unraveling due to climate change, it is essential to do the following: First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. So far, much of the data in support of delisting has been kept from the public. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us exactly how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service MUST declare a hunting moratorium if bears are delisted. It is not necessary to hunt grizzly bears in order to manage their population. Furthermore, high-priced trophy hunting licenses create a perverse disincentive against conservation for underfunded state agencies. Idaho, Montana, and Wyoming are planning to hunt bears once they're delisted. I STRONGLY oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. The idea of killing bears as they cross invisible national park boundaries is appalling and would forever blacken the reputations of our state wildlife management agencies. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on mining, logging, oil and gas drilling, real estate development, and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and	GYC	
Plans need to identify the funding to pay for maintaining a healthy grizzly bear population. - Protect core habitat. - Reduce conflicts and maintain stable numbers of bears. - Create connections between bears, and coordinate bear management across the region	103			Data doubts and comments on process	My comments on the proposed delisting rule. Please put the proposed rule on hold. State grizzly bear management plans are out dated and unfounded. Our nation needs to plan to protect the places where bears live. Habitat has dwindled and needs be protected. The Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming, planning to hunt bears, do not have a sustainable coordinated plan. I oppose grizzly bear hunting. There is no over abundance of bears. Questionably, the challenges for a sustainable may never be overcome due to the current habitat limitations and interactions with humans. Grizzly bears are worth more alive than dead. Especially bear #399 and #610. I would think they would be the first shot since their habits are well know for leaving the park. That would be tragic and possibly trigger more that a government agency would want to, or afford to, deal with. Those bears are beloved by all. Plans need to identify the funding to pay for maintaining a healthy grizzly bear population. - Protect core habitat. - Reduce conflicts and maintain stable numbers of bears. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	Funding for maintaining habitat.
United States is approximately 2,000 with another 50,000 spread across Canada and Alaska. Based on the comparison of these numbers, how can you even considered taking them off the Endangered Species list?	101			Data doubts and comments on process	I'm sure making decisions regarding the welfare of wild animals is very difficult, especially when the issue of delisting an endangered species is involved. However, here is a fact that I thought I would point out: Elephants fall into the Critically Endangered to Vulnerable category according to the World Wildlife Federation, yet there are more than 500,000 elephants world wide The grizzly bear population in the continental United States is approximately 2,000 with another 50,000 spread across Canada and Alaska. Based on the comparison of these numbers, how can you even considered taking them off the Endangered Species list?	GYC	

It is far, far to early in the bests recovery to delist them.	100			Data doubts and comments on process	I am writing to ask that you do not delist Yellowstone grizzly bears. Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered. Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. It is far, far to early in the bests recovery to delist them. It will be devastating to the fragile Yellowstone Ecosystem. I implore you to rethink this and do not realist the Bears. Thank you for you compassionate consideration.	Humane Society	
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And in general stop doing this to newly recovered animals (wolves in Minnesota for instance). There needs to be a more scientific approach to how you define population baselines in order to determine if an animal is ready to be removed from pritection. Studies have shown that this would have to be the populations from before ANY peoples were on the continent! That would require populations at least ten times larger than you are currently deeming appropriate .	102	103		Data doubts and comments on process	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. And in general stop doing this to newly recovered animals (wolves in Minnesota for instance). There needs to be a more scientific approach to how you define population baselines in order to determine if an animal is ready to be removed from pritection. Studies have shown that this would have to be the populations from before ANY peoples were on the continent! That would require populations at least ten times larger than you are currently deeming appropriate.	Humane Society Petition	

Trophy hunting is not justifiable as a conservation tactic and has no place in science based wildlife management and protection .	100			Data doubts and comments on process	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. How is it possible that there is even a serious discussion of removing federal protection? If that happens, the outcome is known in advance. Trophy hunting is not justifiable as a conservation tactic and has no place in science based wildlife management and protection.	Humane Society Petition	
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Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior and how your proposal takes these changes into account.	103			Data doubts and comments on process	Take the following steps before finalizing it: Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries on park-adjacent lands and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior and how your proposal takes these changes into account. Provide the public with a clear and detailed plan for how grizzlies will be managed and protected and for how their long term conservation will be assured once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals.	NPCA	
Provide the public with a clear and detailed plan for how grizzlies will be managed and protected and for how their long term conservation will be assured once management is turned over to state wildlife agencies.	103			Data doubts and comments on process	Take the following steps before finalizing it: Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries on park-adjacent lands and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior and how your proposal takes these changes into account. Provide the public with a clear and detailed plan for how grizzlies will be managed and protected and for how their long term conservation will be assured once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals.	NPCA	
Get back to science and out of filthy politics.	102			Data doubts and comments on process	A disgrace that this is even being considered. Get back to science and out of filthy politics.	WELC	
Considering the rash of proposed ESA delistings in the last few years that have been based on flawed and weak claims not justified by the scientific record, I am extremely skeptical that delisting the grizzly is justified.	102			Data doubts and comments on process	I believe that grizzly bear populations are still too low to remove them from the ESA. Threats of hunting cannot be understated and illegal killings are likely to increase as well. I do not believe the genetic diversity of existing populations can be preserved without the ESA. I believe that delisting will put the long term viability of this species at grave risk. Considering the rash of proposed ESA delistings in the last few years that have been based on flawed and weak claims not justified by the scientific record, I am extremely skeptical that delisting the grizzly is justified.	WELC	

I have reviewed information concerning the delisting of Yellowstone's grizzly bears, and have reached the conclusion that there is not proof that the population of bears has grown to stable numbers.	102			Data doubts and comments on process	I have reviewed information concerning the delisting of Yellowstone's grizzly bears, and have reached the conclusion that there is not proof that the population of bears has grown to stable numbers. In fact, the bear seems to be in decline from stable growth, due to food source depletion and habitat deterioration, human interaction mortality, both accidental and illegal, and scarcity of cub success due to the above human and environmental interactions. The USFWS own recovery plan does not demonstrate that the YEP of Grizzly bears is stable and has reached a point that release from the ESA is warranted. Release of the bears from protection would undoubtedly cause very high trophy hunting mortality in the surrounding states of Wyoming, Idaho, and Montana, as YEP bears forage in wider ranges, not knowing park protection boundaries. Please do not remove grizzly bears from the federal list of endangered species. I am not a young tree hugger, but a grandfather, life NRA member, and an environmental hunter. I want my great-grandchildren to be able to see grizzly's in the wild.	FWS-R6-ES-2016-0042-0460	
The proposed rule outlines the perimeters for federal intervention and hunting allowances, but that outline is insufficient, because it does not consider the cumulative effects of climate change and hunting on the species. The proposed rule discusses the possible impacts of climate change on the species separate of direct human impacts. The proposed rules fails to view both of these large impacts congruently. The proposed rule states that the hunting allowances can be changed year to year, giving some flexibility to agency. But this flexibility may not be enough. A large fire or extreme drought stemming from climate change following hunting season could decimate the population, even if the following hunting season is cancelled. These two large population controls need to be consider in tandem.	101	102	103	Data doubts and comments on process	The delisting of the GYE grizzly bears is premature. The grizzly bear was listed in 1975, and saw large population growth and stabilization. It has been listed for forty-one years, and while there has been significant growth in the program, when considering the possible implications of climate change and hunting on the species, forty-one years is not long enough time of protection. In allowing the states to manage the GYE grizzly bear that will allow the GYE, a game species, to potentially be hunted. The proposed rule states that Idaho, Wyoming, and Montana have no current plans to allow the grizzly to be hunted, but that proposition will not last long. State fish and wildlife agencies are more pliable than the federal government, increased public pressure to hunt the bears will lead to state regulated hunting. The proposed rule outlines the perimeters for federal intervention and hunting allowances, but that outline is insufficient, because it does not consider the cumulative effects of climate change and hunting on the species. The proposed rule discusses the possible impacts of climate change on the species separate of direct human impacts. The proposed rules fails to view both of these large impacts congruently. The proposed rule states that the hunting allowances can be changed year to year, giving some flexibility to agency. But this flexibility may not be enough. A large fire or extreme drought stemming from climate change following hunting season could decimate the population, even if the following hunting season is cancelled. These two large population controls need to be consider in tandem. The grizzly population recovery is important, predator species are so very important to the health of western ecosystems. It is too soon to remove the grizzly bear, because the long term effects of climate change on the species is too unknown to open the species up to state management, where the possibly for large scale hunting is very high. Many in the west view predators as an issue, but that approach should not influence the delisting of the GYE grizzly, because the future effects of climate change are too unknown. Forty-one years of recovery should not be hastily dashed, because of public pressure on limiting predator species.	FWS-R6-ES-2016-0042-0591	
4--The unreasonable reliance of FWS on unreliable bear numbers.		102		Data doubts and comments on process	As a lifelong resident of the Greater Yellowstone Ecosystem, and one who has worked directly with the Inter Agency Recovery Team over a span of many years, I strongly oppose the delisting the the Grizzly bear. I join those who are concerned about: 1--The voracious desire, most notably by surrounding states of Wyoming and Montana, to capitalize financially on trophy hunting. 2--The under-studied repercussions of climate change and the impact on the bear's food supply. 3--Shrinking habitat, that is even now far too limited. 4--The unreasonable reliance of FWS on unreliable bear numbers. 5--The absence of corridors to permit grizzly migration. 6--The inability to forecast human caused bear mortality, that is only going to increase with development and population growth. The Yellowstone Grizzly is a national treasure. Removal from endangered/threatened status is trading that treasure for fool's gold. While it may be provide a boastful feather in the cap for FWS, it will prove to be one of the most ill-conceived proposals ever advanced by FWS.	FWS-R6-ES-2016-0042-0672	
Look at the ages of the bears still at Yellowstone - how many will pass due to age or sickness in the next few years? How many females are there still in breeding age? How many cubs survive each year? It's is not just about the number they are at now. I don't think 770 is a large number. Nature takes care of itself.	102	101		Data doubts and comments on process	I really hope that you leave the Grizzly Bear on the Federal List of Endangered and Threatened Wildlife. It has taken them 41 years to grow such a small number. They are beautiful creatures. I hope to be able to see one in person one day. It is not hurting anything or anyone, except for big game hunters by leaving them and others on the list. Please take deep consideration before making any decision. Look at the ages of the bears still at Yellowstone - how many will pass due to age or sickness in the next few years? How many females are there still in breeding age? How many cubs survive each year? It's is not just about the number they are at now. I don't think 770 is a large number. Nature takes care of itself. We as humans need to allow nature to take it's own course and stay our of the way.	FWS-R6-ES-2016-0042-2515	

How could you release management of this iconic species to the states that forced the USFWS to list them in the first place under the Endangered Species Act? Look what happened to the gray wolf when it was delisted in 2012; the governing body of Wyoming allowed wolves to be shot on sight and just like that years of careful conservation efforts were setback decades. The status of the grizzly bear indirectly protects other species as the ESA safeguards the habitat of not only the grizzly but every other creature who lives alongside it. I can also point to the fact that two major food sources the grizzly bear relies on have drastically plummeted. Whitebark pine seeds and cutthroat trout do not command the numbers they must in order for grizzlies to not go into human inhabited areas and search out alternative food sources, increasing their risk of being shot. Whitebark pine is in fact listed as endangered by the International Union for the Conservation of Nature. I understand the USFWS is looking for a success story. I would argue you have already found some in the American alligator, the black footed ferret, the whooping crane, and the California condor. There is no reason to sully what you have done for the grizzly bear by doing something as rash as depriving them of federal protection. Don't give Wyoming, Idaho, and Montana the power to decide this bear's fate; they will choose poorly as they have done historically and then you will be taken as fools, fools which you are not because the USEWS has done so much	102	103		Data doubts and comments on process	As a concerned citizen I would like to voice my concern about the USFWS's proposed delisting of the Yellowstone grizzly bears. How could you release management of this iconic species to the states that forced the USFWS to list them in the first place under the Endangered Species Act? Look what happened to the gray wolf when it was delisted in 2012; the governing body of Wyoming allowed wolves to be shot on sight and just like that years of careful conservation efforts were setback decades. The status of the grizzly bear indirectly protects other species as the ESA safeguards the habitat of not only the grizzly but every other creature who lives alongside it. I can also point to the fact that two major food sources the grizzly bear relies on have drastically plummeted. Whitebark pine seeds and cutthroat trout do not command the numbers they must in order for grizzlies to not go into human inhabited areas and search out alternative food sources, increasing their risk of being shot. Whitebark pine is in fact listed as endangered by the International Union for the Conservation of Nature. I understand the USFWS is looking for a success story. I would argue you have already found some in the American alligator, the black footed ferret, the whooping crane, and the California condor. There is no reason to sully what you have done for the grizzly bear by doing something as rash as depriving them of federal protection. Don't give Wyoming, Idaho, and Montana the power to decide this bear's fate; they will choose poorly as they have done historically and then you will be taken as fools, fools which you are not because the USEWS has done so much	FWS-R6-ES-2016-0042-0324	
We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best: Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data.	102	105		Data doubts and comments on process	We have lived, worked and recreated in the Greater Yellowstone Ecosystem (GYE) for almost 40 years, meeting working in Yel lowstone National Park. We have explored by foot thousands of miles of trails into some of the most breathtaking landscapes on earth, filled with the suite of native wildlife that we so love and respect. We have seen many grizzly bears over the decades and no animal is more powerful in the public's sensibility than the Great Bear. It is our state animal, picked by Montana school children. Our native tribes greatly value the grizzly bear as do all of us who value our wild places and wildlife. The grizzly bear is greater than life; it represents all that we as a people almost lost and what we have preserved. We value our large predators, our carnivores, because they remind us that we share life together in this time and place. They represent the wilderness we almost lost. We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best: Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data. Because the ecosystem is becoming stressed by climate change causing dramatic changes in food supplies needed. Because all foods are not equal. Because grizzlies are being killed at a rate the slowly-reproducing animals cannot tolerate long-term; since 2002 the population has probably declined Because connectivity with other bears depends upon GYE grizzlies roaming and hunting would preclude that. Because human caused mortality is mostly avoidable and prevention is not stressed enough. Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable. Because sport trophy hunting of grizzly bears would be abhorrent and would reverse recovery. Because tolerant bears that people see around the parks would be the first killed. Because wildlife watchers are ignored by state wildlife agencies and the USFWS. Just look at wolf and bison management. Because tribal interests are ignored by state wildlife agencies. Because wildlife watching brings in far more economically than does hunting in GYE states. Because listing the grizzly as a distinct population segment (DPS) is possibly illegal, because it precludes the bears seeking connectivity. Because the GYE grizzly bear lives on an ecological island. Because politics trumps science every time. We love our grizzly bears and want them protected from nefarious forces bent upon hunting them. USFWS should listen to the public's concerns, listen to opposing scientists and do the right thing. Do not delist the grizzly bear.	FWS-R6-ES-2016-0042-0422	

Because wildlife watchers are ignored by state wildlife agencies and the USFWS. Just look at wolf and bison management. Because tribal interests are ignored by state wildlife agencies.	105			Data doubts and comments on process	We have lived, worked and recreated in the Greater Yellowstone Ecosystem (GYE) for almost 40 years, meeting working in Yel lowstone National Park. We have explored by foot thousands of miles of trails into some of the most breathtaking landscapes on earth, filled with the suite of native wildlife that we so love and respect. We have seen many grizzly bears over the decades and no animal is more powerful in the public's sensibility than the Great Bear. It is our state animal, picked by Montana school children. Our native tribes greatly value the grizzly bear as do all of us who value our wild places and wildlife. The grizzly bear is greater than life; it represents all that we as a people almost lost and what we have preserved. We value our large predators, our carnivores, because they remind us that we share life together in this time and place. They represent the wilderness we almost lost. We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best: Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data. Because the ecosystem is becoming stressed by climate change causing dramatic changes in food supplies needed. Because all foods are not equal. Because grizzlies are being killed at a rate the slowly-reproducing animals cannot tolerate long-term; since 2002 the population has probably declined Because connectivity with other bears depends upon GYE grizzlies roaming and hunting would preclude that. Because human caused mortality is mostly avoidable and prevention is not stressed enough. Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable. Because sport trophy hunting of grizzly bears would be abhorrent and would reverse recovery. Because tolerant bears that people see around the parks would be the first killed. Because wildlife watchers are ignored by state wildlife agencies and the USFWS. Just look at wolf and bison management. Because tribal interests are ignored by state wildlife agencies. Because wildlife watching brings in far more economically than does hunting in GYE states. Because listing the grizzly as a distinct population segment (DPS) is possibly illegal, because it precludes the bears seeking connectivity. Because the GYE grizzly bear lives on an ecological island. Because politics trumps science every time. We love our grizzly bears and want them protected from nefarious forces bent upon hunting them. USFWS should listen to the public's concerns, listen to opposing scientists and do the right thing. Do not delist the grizzly bear.	FWS-R6-ES-2016-0042-0422	
USFWS should listen to the public's concerns	105			Data doubts and comments on process	We have lived, worked and recreated in the Greater Yellowstone Ecosystem (GYE) for almost 40 years, meeting working in Yel lowstone National Park. We have explored by foot thousands of miles of trails into some of the most breathtaking landscapes on earth, filled with the suite of native wildlife that we so love and respect. We have seen many grizzly bears over the decades and no animal is more powerful in the public's sensibility than the Great Bear. It is our state animal, picked by Montana school children. Our native tribes greatly value the grizzly bear as do all of us who value our wild places and wildlife. The grizzly bear is greater than life; it represents all that we as a people almost lost and what we have preserved. We value our large predators, our carnivores, because they remind us that we share life together in this time and place. They represent the wilderness we almost lost. We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best: Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data. Because the ecosystem is becoming stressed by climate change causing dramatic changes in food supplies needed. Because all foods are not equal. Because grizzlies are being killed at a rate the slowly-reproducing animals cannot tolerate long-term; since 2002 the population has probably declined Because connectivity with other bears depends upon GYE grizzlies roaming and hunting would preclude that. Because human caused mortality is mostly avoidable and prevention is not stressed enough. Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable. Because sport trophy hunting of grizzly bears would be abhorrent and would reverse recovery. Because tolerant bears that people see around the parks would be the first killed. Because wildlife watchers are ignored by state wildlife agencies and the USFWS. Just look at wolf and bison management. Because tribal interests are ignored by state wildlife agencies. Because wildlife watching brings in far more economically than does hunting in GYE states. Because listing the grizzly as a distinct population segment (DPS) is possibly illegal, because it precludes the bears seeking connectivity. Because the GYE grizzly bear lives on an ecological island. Because politics trumps science every time. We love our grizzly bears and want them protected from nefarious forces bent upon hunting them. USFWS should listen to the public's concerns, listen to opposing scientists and do the right thing. Do not delist the grizzly bear.	FWS-R6-ES-2016-0042-0422	

THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc.	102	103	101	Data doubts and comments on process	I do not support the delisting of Grizzly Bears in GYE. THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected.	FWS-R6-ES-2016-0042-5651	
5- THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Please consider these issues closely before making a final decision. My hope is that the Grizzlies remain on the ESA for many years to come, as this is not the time to delist. But, if the final decision is to delist, I would certainly hope you would consider expanding the boundaries of protection for the Grizzlies around the GYE 20-50 miles. These Grizzlies do wander outside of the park boundaries in search of food and for hibernation, which would subject them to being hunted.	103			Data doubts and comments on process	Please consider the following as valid reasons NOT to remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. 1- EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. 2- DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. 3- GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected. 4- DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. 5- THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Please consider these issues closely before making a final decision. My hope is that the Grizzlies remain on the ESA for many years to come, as this is not the time to delist. But, if the final decision is to delist, I would certainly hope you would consider expanding the boundaries of protection for the Grizzlies around the GYE 20-50 miles. These Grizzlies do wander outside of the park boundaries in search of food and for hibernation, which would subject them to being hunted.	FWS-R6-ES-2016-0042-5055	
The USF & WS does not have adequate input on the hunting of Grizzly Bears that would be set up by the states of Montana, Wyoming, and Idaho. Delisting would result in limiting the ability of a recovering population of bears to continue expanding into areas of their former range. Grizzly Bears should not be de-listed until they have been successfully restored to central Idaho and the North Cascades of Washington state. the US F & W Service has failed to insure that future legal hunting allowed by states will not result in a an unacceptable decline in Grizzly Bear populations	103			Data doubts and comments on process	I believe that it is too soon to remove Grizzly Bears from the Endangered Species List. The USF & WS does not have adequate input on the hunting of Grizzly Bears that would be set up by the states of Montana, Wyoming, and Idaho. Delisting would result in limiting the ability of a recovering population of bears to continue expanding into areas of their former range. Grizzly Bears should not be de-listed until they have been successfully restored to central Idaho and the North Cascades of Washington state. the US F & W Service has failed to insure that future legal hunting allowed by states will not result in a an unacceptable decline in Grizzly Bear populations	FWS-R6-ES-2016-0042-5068	

The conservation efforts that have been deployed to encourage the Grizzly Bears recovery have been a great success. However, these efforts should be continued until Grizzly populations are connected over the entire landscape between Yellowstone and the Yukon. Isolated populations do not do well over the long run. Grizzly Bears need to be allowed to roam freely through all areas with suitable habitat. The Yellowstone grizzly bear population is an isolated population. There is very little evidence that Grizzly Bears from Yellowstone travel to other Grizzly Bear populations to the north.	103			Data doubts and comments on process	To the U.S. Fish and Wildlife Service: I am writing for the board of directors of the North Fork Preservation Association to comment on the proposal to remove Grizzly Bears in the Greater Yellowstone Ecosystem from the Federal List of endangered and threatened wildlife. Our community on the North Fork of the Flathead River in Northwest Montana, sitting just below the U.S./Canadian border next to Glacier National Park is one of the most ecologically diverse regions in North America. We also have the highest population of Grizzly Bears in the lower 48 states. Surrounded by public land and wildlife habitat, we have learned to live peacefully in the Grizzly country. We value these bears and have enjoyed watching their numbers grow over the last few decades. The conservation efforts that have been deployed to encourage the Grizzly Bears recovery have been a great success. However, these efforts should be continued until Grizzly populations are connected over the entire landscape between Yellowstone and the Yukon. Isolated populations do not do well over the long run. Grizzly Bears need to be allowed to roam freely through all areas with suitable habitat. The Yellowstone grizzly bear population is an isolated population. There is very little evidence that Grizzly Bears from Yellowstone travel to other Grizzly Bear populations to the north. Without this connectivity, genetic diversity cannot remain strong in the Yellowstone population. For this reason, we feel that it is too early to delist Grizzly Bears. We also disagree with trophy hunting grizzly bears. It has taken many decades and millions of our tax dollars to change the trend toward extinction and hunting these iconic creatures seems contrary to everything that we have achieved. In addition, the status of Grizzly Bears in the public mind has risen. Many visitors come to Montana and Wyoming hoping to see a Grizzly Bear. These bears are the heritage of all of the people in the U.S., not just those of us who live in Montana, Wyoming, or Idaho. Just from an economic viewpoint these Bears generate more income for Montana, Wyoming, and Idaho from visitors than will ever be realized from 10-50 annual Trophy Tags. There are many more people who want to see a grizzly bear than shoot one. There also needs to be adequate and continual funding for Bear conservation in place, including bear management personnel to deal with bear-people conflicts, before delisting happens. The loss of federal money for conservation efforts is a major concern regarding delisting. For these reasons, we oppose the delisting of Grizzly Bears at this time.	FWS-R6-ES-2016-0042-5128	
US FWS must submit their population data for proper peer review (the Interagency Grizzly Bear Study Team doesn't count.) There may well be 700 bears, but it is suspect that the number nearly doubled in 2007 when delisting was on the table. It is suspect that for many yrs the population was 260-600, then all of a sudden it was a solid 700. The methods involve a lot of extrapolation from very few verifiable sightings and that should make us nervous. An independent, unbiased, qualified source can be trusted with the geographic data the IGBST is reticent to release.	102	103	101	Data doubts and comments on process	I have spend a significant amount of time in Yellowstone from 1995 to present. I have a deep love for the Greater Yellowstone Ecosystem and want my children to be able to grow up and see this land as I have come to know it -- a large are a of relatively undisturbed habitat. Removing Grizzly Bears will drastically change the dynamics of the ecosystem. We are going to see a decrease in bears WITHOUT hunting, due to development and an increase in the human population in the Greater Yellowstone Ecosystem (GYE), especially after delisting when so much of their habitat will be opened to fracking, natural gas development, mining and trophy homes. By the time we need to re-list, which will most certainly happen due to a variety of reasons below, we will have lost critical habitat and many other species under the grizzly umbrella. Having lived in the GYE for the past 20 years, learning and teaching about this ecosystem, I promise you, this will have major effects. The number one threat to the GYE is climate change. We are currently experiencing an extinction rate 1000x greater than anything on the paleontological record, and it is our fault. Water availability affecting flora and fauna, foods for grizzlies, will be affected. Plants will be migrating up, or north and bears may not be able to follow them. A precarious population with an extremely low growth rate will not fare well under any circumstances, let alone one without utmost protection. Their threatened critical food sources (trout, whitebark pines) that are supposedly being replaced with other sources do not take into account the difference in caloric value, quality of food, seasonal needs, and availability without human interference. There are temporal, spatial, caloric and risk factors that aren't being addressed in the proposal. The "adaptable bear" argument is moot. US FWS must submit their population data for proper peer review (the Interagency Grizzly Bear Study Team doesn't count.) There may well be 700 bears, but it is suspect that the number nearly doubled in 2007 when delisting was on the table. It is suspect that for many yrs the population was 260-600, then all of a sudden it was a solid 700. The methods involve a lot of extrapolation from very few verifiable sightings and that should make us nervous. An independent, unbiased, qualified source can be trusted with the geographic data the IGBST is reticent to release. The fact that the Northern Continental Divide Ecosystem bears are not on the chopping block is odd. There are more bears in that population, yet ours are threatened with less protection. The incredible pressure on this land for development of second (and third) homes, fracking, mining and general development is astonishing, and powerful enough to convince public officials we should throw caution to the wind and see how it goes. There was a 6% decrease in the past 2 years and at least 59 known dead last year (likely higher). This is a trend for the past few years. Actual numbers will rise and fall, but there is not an overall growth trend. Grizzly protection also shelters my sanity. To live and hike in griz	FWS-R6-ES-2016-0042-5209	

The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so.	101	102		Data doubts and comments on process	The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population. Research has also shown threshold population effects, which could mean that by the time the problem is detected, it is too late to fix the problem. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Indeed, at the recent announcement of the delisting proposal, Senator Larry Craig used the opportunity to call for weakening the Endangered Species Act. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources. The delisting plan lacks binding motorized access management standards to protect habitat. The 1993 Grizzly Bear Recovery Plan and scientific research have demonstrated that roads kill bears.	FWS-R6-ES-2016-0042-5224	
Carrying capacity Å The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have Å reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase numbers in the ecosystem (ref. Fig. 1 p 13180, of The Rule). An alternative hypothesis that is Å not considered in The Rule , is that carrying capacity itself has been reduced, primarily as a result of Å declining food resources. The alternative hypothesis of reduced carrying capacity, with the inference Å that increased range must be provided to provide adequate habitat for a truly recovered population. This alternative hypothesis must be fully explored to satisfy the requirement for "best science" as Å required by law.	103	101	102	Data doubts and comments on process	Do not delist the Grizzly Bear. It requires if anything expanded, not minimized protection. There are five main reasons for this I would like to highlight but if I could write more, I could list several more reasons why this is not just a bad, but immoral action. 1. Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high-elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Rule cavalierly dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. 2. Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase numbers in the ecosystem (ref. Fig. 1 p 13180, of The Rule). An alternative hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. The alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population. This alternative hypothesis must be fully explored to satisfy the requirement for "best science" as required by law. 3. Excessive, unsustainable mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection. Removing T&E protection and placing it in the hands of the three states of Idaho, Montana, and Wyoming is incompatible with any concept	FWS-R6-ES-2016-0042-0742	
Any credible evidence about the subject, that I have researched, concludes that the process of delisting is premature. Certainty must prevail in contemplating such action.	102			Data doubts and comments on process	I strongly oppose delisting the grizzly bear as an endangered species with the GYA. Any credible evidence about the subject, that I have researched, concludes that the process of delisting is premature. Certainty must prevail in contemplating such action. The grizzly is iconic, necessary to the habitat, and is still in an adjustment phase of accommodating the impact of the pine bark beetle infestation. I will add that it is the case that wildlife watching has overtaken the combined value of hunting and fishing as the greatest engine of our area's economy. Grizzlies are one of the top attractions for our area's visitors.	FWS-R6-ES-2016-0042-0758	

For these reasons, I ask USFWS to withdraw its plan to delist grizzly bears in the Yellowstone ecosystem or, at a minimum, dramatically strengthen the plan to protect a population that took 40 years to grow.	103			Data doubts and comments on process	Please keep Yellowstone ecosystem grizzly bears protected under the Endangered Species Act. If bears are delisted, hunting should not be allowed. A large majority of Americans (68%), including 50% of hunters, oppose sport hunting of grizzly bears. These animals are icons of the West and are revered as sacred beings by the native tribes, 50 of which oppose delisting. In addition, record number of grizzly bears were killed in 2015 - including the famous patriarch of Yellowstone, Scarface. Most of these killings were due to conflict with hunters or livestock operations. Once delisted, the states will be able to remove even more bears from the ecosystem due to human conflicts. We need to see what that looks like before grizzly hunting is permitted. Therefore, if bears are delisted, USFWS should institute a minimum five year moratorium on hunting to enable the surrounding states to prove effective management of grizzly bears. Finally, if hunting is allowed, there must be no-hunt zones around the national parks and connecting Yellowstone and Grand Teton national parks. Hunting of roadside bears and popular park bears that wander out of the park endangers not only the bear population but the economy of the region. Yellowstone's nature-based economy is worth one billion dollars a year. People who work at the park can tell you what visitors are coming to see. It is not the mud pots or Old Faithful that are the big draw. Tourists flock to Yellowstone and the Grand Tetons for the wildlife - with grizzly bears topping the list. For these reasons, I ask USFWS to withdraw its plan to delist grizzly bears in the Yellowstone ecosystem or, at a minimum, dramatically strengthen the plan to protect a population that took 40 years to grow.	FWS-R6-ES-2016-0042-1822	
the grizzly bear simply is still at risk of extinction. There are too many "unknowns" in the calculations / extrapolations. The fact is, the only way to know the true health of the grizzly population is to have an accurate count of sows with cubs of the year. 750 grizzlies (the upper estimate) means nothing if the majority of these bears are male and/or females without cubs.	102	103		Data doubts and comments on process	Delisting grizzlies in the GYE is a mistake. I have been visiting Yellowstone for over 15 years. I make the long trek from Southern California to Yellowstone every year; sometimes twice a year for one main reason. To hike the backcountry with the great bear. I am not a scientist. I have no "Hard Numbers" of data to offer to my argument. Just my experience as a hiker and overnight backpacker through the Pelican Valley, Mist Trail, Lamar Trail, Rim Trail, on and on. I can tell you this, seeing a grizzly in the backcountry is a life changing event. It puts humility back in humanity. It lets us know that (without high powered rifles) we are not the alpha predator. We have our brain and our opposable thumbs. Our Brain goes on "Hi Alert" when in grizzly country. Our opposable thumbs lift our backpacks at night to keep the bruins from raiding our campsites. We hold bear spray with the situation arises. But in the moment, our daily problems disappear as our goal is to enjoy nature on NATURES TERMS. And, to me, the grizzly bear is the epitome of nature; of "The Wild." This is an animal that can kill a human at anytime if it choose to do so. It rarely; I mean RARELY does. And when it does, it is usually because we have made a mistake. We have not respected the great bear and the results can be deadly. Of course, even the most stupid human mistakes in bear country rarely result in injury, let alone death. I think it is clear that the jury is out on the status of the grizzly bear and its recovery status in the GYE. Scientists, groups on both sides (including the powerful attorneys) are set to battle no matter which decision is made. But what strikes me is that there are so few grizzlies in the lower 48 no matter what estimation, extrapolation is used. Are the grizzlies truly recovered enough to delist? Are some of the numbers of grizzlies located in genetically isolated areas that can not contribute to the ongoing survival of the species? What about the effects of our warming climate and the effect it has on the grizzlies food sources? I know that some scientists say that the lack of the White Bark Pine Nut has had a minimal impact because grizzlies are opportunistic and have adapted. Have they? Are we certain? Do we have enough data over a long enough period to KNOW this. Sadly, it is apparent to me that we as a society are willing to risk the loss of the great bear from the GYE. This is not about human safety as humans are (and should be allowed) to kill aggressive / problem bears. I have no problem with that (when it is properly investigated and legal action taken when the circumstances did not justify killing the grizzly). Montana, Wyoming and Idaho have a "Dog in the fight" because they are anxious to get the fees for grizzly tags. I'm all for states rights. But in this case, the grizzly bear simply is still at risk of extinction. There are too many "unknowns" in the calculations / extrapolations. The fact is, the only way to know the true health of the grizzly population is to have an accurate count of sows with cubs of the year. 750 grizzlies (the upper estimate) means nothing if the majority	FWS-R6-ES-2016-0042-2640	

It would be completely in line with the "best science available" to not hunt Grizzly Bears. These Bears are a national treasure and it is beyond the pale to think that a Trophy Hunt is in their future. Most Americans will not tolerate seeing the much acclaimed "Recovered Grizzly Bear" population being trophy hunted.	102			Data doubts and comments on process	To: Sally Jewell, Secretary, U.S. Department of the Interior Daniel Ashe, Director, U.S. Fish and Wildlife Service From: Cindy Campbell, Grizzly Bear 760 Community, Wilson, Wyoming As a resident of Teton County, Wyoming, I had the privilege of attending the meeting of The Yellowstone Ecosystem Subcommittee of the Interagency Grizzly Bear Committee last November in Teton Village, Wyoming. During the two days of sessions I learned a great deal about the state of affairs of the Grizzly Bear population in my home, the Greater Yellowstone Ecosystem. I also heard a great deal of what I question is truly "best science available". This subjective term used to explain away certain "information", mostly about monitoring of these Grizzly Bears (who live in my backyard) left me feeling confused. I cannot understand certain rationale which has been incorporated into this ruling. One area that astounds me is the Population Monitoring System. I do not know of any other arena, be it government budgets, wildlife management, business endeavors or a banking decision, where a 40% variance (F. van Manen, IGBST, November 4, 2016, Teton Village, Wyoming) in your baseline number is accepted as "best science available". This raises much concern. The original number IBSC has calculated will in fact be the foundation upon which the Great Grizzly Bear is managed for decades to come. We demand to know with 100% certainty that the accuracy of this baseline number is flawless. If IBSC does not have it exactly right from the beginning, it will have detrimental consequences for decades to come. A 40% variance is not acceptable in any situation, especially determining if and when Grizzly Bear are ready to be delisted. Next I fear the "opportunity" to hunt is driving the States plans (Wyoming, Idaho and Montana), rather than the "protecting and preserving of Grizzly Bears". I do not trust my own, or the other two, to properly manage an animal fresh of the Endangered Species List. It has been demonstrated again and again that the citizens of these three States, as well as the country at large, do not want to see Grizzly Bear managed down to the bottom line number. It terrifies me to think how quickly we could lose the foot hold the Bears barely have at this point in time. And then you add in the fact we really have no idea how many Bears there actually are. It would be completely in line with the "best science available" to not hunt Grizzly Bears. These Bears are a national treasure and it is beyond the pale to think that a Trophy Hunt is in their future. Most Americans will not tolerate seeing the much acclaimed "Recovered Grizzly Bear" population being trophy hunted. I do not feel any of the parties involved in preparing this ruling have done nearly enough to educate those living close to and with Grizzly Bears. Tolerance and acceptance is key to their survival. Grizzly Bears have a right to live on the same landscape as we do, and we the right to protect them from heading toward extinction, once again. And lastly, please acknowledge the many qualified scientists who completely disagree.	FWS-R6-ES-2016-0042-5494	
Yellowstone grizzlies will be lost from the Demographic Monitoring Area (DMA) by only two processes, mortality and emigration. But, the Proposed Rule does not consider emigration. Not considering emigration will reduce Rule effectiveness, in part through inaccuracies in underestimating background losses of DMA grizzlies. Before deciding on delisting, please remedy this science shortcoming with analyses using the immense amount of grizzly bear tracking data available from USGS. See supportive details in my comment posted on May 2, 2016.	103	101	102	Data doubts and comments on process	Yellowstone grizzlies will be lost from the Demographic Monitoring Area (DMA) by only two processes, mortality and emigration. But, the Proposed Rule does not consider emigration. Not considering emigration will reduce Rule effectiveness, in part through inaccuracies in underestimating background losses of DMA grizzlies. Before deciding on delisting, please remedy this science shortcoming with analyses using the immense amount of grizzly bear tracking data available from USGS. See supportive details in my comment posted on May 2, 2016.	FWS-R6-ES-2016-0042-5568	

You claim that there are enough grizzlies (700) in the Greater Yellowstone Ecosystem to delist them. How was the number of 700 arrived at, and by whom? Has this number been confirmed by an independent researcher, and if so, by whom? Dr. David Mattson, who has studied grizzlies and mountain lions for the last 35 years, 15 of which were intensive field study in Yellowstone, disagrees with this assessment.	102			Data doubts and comments on process	I strongly oppose the delisting of Grizzly Bears in the Greater Yellowstone Ecosystem. FWS claims that it will be involved in management of and protecting the grizzly population after delisting. However, Montana has already decided to allow trophy hunting for grizzlies. Idaho, Montana, and Wyoming have shown themselves to be hostile towards predators, with little attempt to prosecute poaching, and only minor penalties for poachers who are prosecuted. You claim that there are enough grizzlies (700) in the Greater Yellowstone Ecosystem to delist them. How was the number of 700 arrived at, and by whom? Has this number been confirmed by an independent researcher, and if so, by whom? Dr. David Mattson, who has studied grizzlies and mountain lions for the last 35 years, 15 of which were intensive field study in Yellowstone, disagrees with this assessment. Even IF your estimate is accurate, the population is still in danger. Whitebark pine is being killed off due to climate change, which removes a major food source for the grizzlies. A report by the Interagency Grizzly Bear Study Team that concludes that whitebark pine is not essential to the bears is conceptually flawed, with a bias towards a political agenda, and flatly contradicts an overwhelming body of earlier government research which demonstrated the importance of whitebark pine to the grizzly population. Other major food sources of the grizzly are stressed - cutthroat trout by invasives, and cutworm moths by pesticide use. The decrease in availability of food sources will result in healthier bears, greater mortality, and decreased fertility, all of which will lead to a decline in the bear population. Coming back from any population decline will be difficult for grizzlies, since the females only give birth every 3 years. Lastly, regarding claims that the Greater Yellowstone Grizzly has recovered enough range to be delisted - Under the Endangered Species Act, species must be treated as a whole. The Yellowstone Ecosystem population is no different biologically than other grizzlies in the Northern Continental Divide region. Therefore, you have no legal authority to delist the grizzly in the Greater Yellowstone Ecosystem. Please remember that the wildlife of this nation does not belong to the state Fish and Game Departments, nor to special interest groups such as hunters and outfitters, but to the people of this nation. Thank you for your consideration of my opinion.	FWS-R6-ES-2016-0042-5377	
There are too many unknowns in climate/food source/habitat right now.	100			Data doubts and comments on process	I oppose the delisting of Grizzly Bears. The population/gene-pool is too small and disjointed, for example Yellowstone NP and Glacier NP populations are not even connected by any viable corridor. There are too many unknowns in climate/food source/habitat right now. The applicable states have proven themselves to be incapable of, and even resistant to managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. It is even highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. These bears should not become victims of politics, as the wolves have. I predict that if we delist the bears, the applicable states will begin selling tags to hunt them the next season.	FWS-R6-ES-2016-0042-0066	
More time is needed to prove that normal mortality and accidental and human encounter deaths are not significant risks to the current population. Because the breeding habits of the bear make population changes slow, an error in delisting now could put the whole recovery at risk.	103			Data doubts and comments on process	I do not believe the grizzly bear recovery is a confirmed event. Yes, the bear numbers are up, but I do not believe stability has been confirmed. More time is needed to prove that normal mortality and accidental and human encounter deaths are not significant risks to the current population. Because the breeding habits of the bear make population changes slow, an error in delisting now could put the whole recovery at risk. I costs little to wait for evidence of claimed stability.	FWS-R6-ES-2016-0042-0102	

A secondary unforeseen problem that has reared its ugly head in recent years is the misinformation campaign of certain US agencies as well as one sided mainstream media stories. For example, government agencies and U.S. newspaper articles have claimed that the Yellowstone Bear population has increased and even doubled since the last time the US Fish and Game tried to remove the bear in 2006. In dissent of this opinion, a recent annual report compiled by Dr. David Mattson from the Interagency Grizzly Bear Study Team concludes that the Yellowstone Grizzly population has not only not grown since 2002, it has actually declined since 2007. This effort to misinform the public is both disturbing and problematic because the American people are not getting the truth.	102	101		Data doubts and comments on process	To Secretary of the Interior Ms. Sally Jewell, I am writing to you about the issue of the U.S. Fish and Game Department's decision to remove the Yellowstone Grizzly Bear aka Brown Bear off the Federal Endangered Species Protection list. This is a complex issue as are the consequences of this amazing animal losing their endangered protection. The final answer as to why the Yellowstone Grizzly should not be removed is clearly because the species is not recovered. Instead of delisting, with all the time, money, and effort spent to bring back the bear from extinction, more money and time needs to be spent educating the growing human population on living in bear territory. Currently, the #1 cause of bear mortality still stems from conflicts with people. A secondary unforeseen problem that has reared its ugly head in recent years is the misinformation campaign of certain US agencies as well as one sided mainstream media stories. For example, government agencies and U.S. newspaper articles have claimed that the Yellowstone Bear population has increased and even doubled since the last time the US Fish and Game tried to remove the bear in 2006. In dissent of this opinion, a recent annual report compiled by Dr. David Mattson from the Interagency Grizzly Bear Study Team concludes that the Yellowstone Grizzly population has not only not grown since 2002, it has actually declined since 2007. This effort to misinform the public is both disturbing and problematic because the American people are not getting the truth. Let it be known that I wish to only focus on a few important points in this letter as opposed to the many reasons as to why delisting the Yellowstone Bear is the wrong move at this time. Female bears if healthy only have litters about every 3 years and do not reproduce easily. The Yellowstone Bear population has been isolated for over 100 years and some evidence suggests that the population is suffering from the effects of inbreeding. The Brown Bear currently occupies about 1% of their historic range prior to Europeans settling the United States. While there is available habitat suitable for Brown Bears that could be used to connect the few remaining populations in the lower 48 states, the current plan calls for flying or driving male brown bears to Yellowstone in order to mate and improve their genetic diversity. Again, this is a wrong-headed move unless given no other choice to sustain a healthy population. Currently, ranchers and farmers are compensated for the loss of domesticated animals by Yellowstone Bears. While some ranchers are working out their differences peaceably with grizzly bears, others are not. For that reason, federal oversight is still necessary. The issue of climate change as it relates to the loss of the bear's food sources must also be addressed. U.S. Fish and Wildlife Service has claimed that it's OK to delist the Grizzly now, even though it has lost 2 of their 4 major food sources because of climate change and invasive species. Warming temperatures are expected to remove the summer alpine haunts	FWS-R6-ES-2016-0042-0008	
What "science" shows the species has fully recovered? And how is the population measured? Is it a one time thing and then that number is used even though there are many deaths due to illegal hunting, disease, accidents, "accidents" that aren't true accidents and other misfortunes that befall any species.	102			Data doubts and comments on process	What "science" shows the species has fully recovered? And how is the population measured? Is it a one time thing and then that number is used even though there are many deaths due to illegal hunting, disease, accidents, "accidents" that aren't true accidents and other misfortunes that befall any species. I still feel the best way to hunt is to use a camera and then hang that on your wall. An old hide after awhile is thrown away and a live picture/video will always have visual value. Using government agencies to carry out trophy, corporate and individual goals just isn't right when they destroy family units by killing a member that the rest depend on.	FWS-R6-ES-2016-0042-0204	
The data analysis is sparse and is derived from an incomplete view of the relationship of bears to the specified areas in the proposed rule.	102			Data doubts and comments on process	I am concerned that the impact analysis is incomplete. The data analysis is sparse and is derived from an incomplete view of the relationship of bears to the specified areas in the proposed rule. It is inappropriate to remove protections for the bear population based on predominantly subjective opinions and an incomplete understanding of the impacts to the ecosystem.	FWS-R6-ES-2016-0042-0227	

Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology.	100			Data doubts and comments on process	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	
Use science based wildlife management.	102			Data doubts and comments on process	Use science based wildlife management. Once a sustainable population exists, which based on numbers and comments from Wildlife Managers I believe it does, hunt them. Large predators needs to be hunted in general to make them fear humans, and many people enjoy hiking, fishing and spending time in Grizzly country. A hunted population should run from humans. When bears don't run, there is too much risk of human interaction, which leads to maulings. In summary, trust the scientists to determine sustainable populations, not politicians or the public, and hunt them to keep sustainable populations in check and behaved.	FWS-R6-ES-2016-0042-0303	
In summary, trust the scientists to determine sustainable populations, not politicians or the public, and hunt them to keep sustainable populations in check and behaved.	100			Data doubts and comments on process	Use science based wildlife management. Once a sustainable population exists, which based on numbers and comments from Wildlife Managers I believe it does, hunt them. Large predators needs to be hunted in general to make them fear humans, and many people enjoy hiking, fishing and spending time in Grizzly country. A hunted population should run from humans. When bears don't run, there is too much risk of human interaction, which leads to maulings. In summary, trust the scientists to determine sustainable populations, not politicians or the public, and hunt them to keep sustainable populations in check and behaved.	FWS-R6-ES-2016-0042-0303	
Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends.	100			Data doubts and comments on process	Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends.	FWS-R6-ES-2016-0042-0334	
scientific facts say that at least--at least--10-more years are needed to complete there studies	102	103		Data doubts and comments on process	i strongly disagree--with the removal of grizzly bears from the yellowstone ecosystem ! the endangered list should be left in place ! scientific facts say that at least--at least--10-more years are needed to complete there studies ! leave the grizzly bears remain protected !!!	FWS-R6-ES-2016-0042-0356	

This decision is wrong and does not listen follow what science says.	102			Data doubts and comments on process	I am against the delisting of grizzly bears. Grizzlies are the slowest reproducing mammal in the world. 40 years and millions of dollars were spent to recover them from a little over hundred to just over 700. That took 40 YEARS!! Why so quick to delist? What is the point of recovery if you turn around and kill without letting the effects of recovery sink in for 10 years or so? And with climate change happening, you haven't given them a fair chance. Predators are essential in the circle of life....you take them away and the ecosystem crumbles downward. Hunting predators is counterproductive and foolish. I am strongly against the delisting. This decision is wrong and does not listen follow what science says. Keep Grizzly Bears Listed!! Thank you	FWS-R6-ES-2016-0042-0336	
The vast majority of Yellowstone grizzly experts are opposed to delisting. According to recent research, nearly 2 in 3 grizzly bear researchers experienced with the Yellowstone population believed delisting would be the incorrect decision, given the multitude of threats bears still face. Indeed, the pre-eminent Yellowstone grizzly researcher in the world, Dr. David Mattson, has come out forcefully opposed to delisting. Mattson, who has researched Yellowstone grizzlies for the USGS for decades and been the lead author on dozens of scientific papers on Yellowstone bears, recently wrote that we should "œput the brakes on the rush to delist Yellowstone"œs grizzly bear population until we have a more reliable picture of what"œs going on, produced by a more reliable and independent process of inquiry.â€œ	103			Data doubts and comments on process	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	
Another successful recovery of a endangered spices which is a great accomplishment and the law should be followed with these animals taken off the endangered list. Anyone who understands the law, understands that if the species becomes endangered again it will be relisted which no one wants.	104			Data doubts and comments on process	Another successful recovery of a endangered spices which is a great accomplishment and the law should be followed with these animals taken off the endangered list. Anyone who understands the law, understands that if the species becomes endangered again it will be relisted which no one wants.	FWS-R6-ES-2016-0042-0375	
I am writing in opposition to Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife because sufficient consideration has not been given to the providing of corridors for Grizzly Bears in order for the genetic health of the species.	103			Data doubts and comments on process	I am writing in opposition to Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife because sufficient consideration has not been given to the providing of corridors for Grizzly Bears in order for the genetic health of the species. While there has been some mention of importing boars into the GYE for breeding purposes, this is not the correct policy. At present the Grizzly Bear population if the GYE is cut off from traveling for any purpose of finding suitable habitat for breeding from any other population. If a Grizzly bear were to leave either Yellowstone National Park or Grand Teton National Park for any habitat or breeding needs in order to maintain a viable genetic pool they could or would most likely be killed. And you have not taken sufficient information into consideration regarding our changing climate. Unless you proved safe passage for Grizzly Bears in order to reach viable habitat—which includes food sources necessary to their survival, you should not be opening up Grizzly bears to trophy hunting. There has never been proven the necessity for the killing of Grizzly bears for sport. Killing to remove a bear from incidents caused by humans will most likely to continue because of human desires to encroach on bear territory. Bears are never the problem. Humans are. Until you provide safe passage for Grizzly bears from one gene pool area to another you should not delist them. More than one agency (as I am almost certain you are aware) has opposed delisting based on science. Unless you wish for so few bears that their population is not viable in YNP or GTNP and the GYE you should refrain from putting the Grizzly bear in the cross hairs of a trophy hunter's rifle. You should be demonstrating that you understand what you will be causing by delisting Grizzly bears. No hunter's life depends on a dead Grizzly bear. Grizzly bears depend now on humans for their lives. No human male or female has proven the need to chop off a head and paws and skin a bear to keep his family warm.	FWS-R6-ES-2016-0042-0381	

x We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? Å	103	102		Data doubts and comments on process	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of	FWS-R6-ES-2016-0042-0320	
The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends.	101	102	103	Data doubts and comments on process	The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range This is being considered for the benefit of trophy hunters and is not based on the science above or any consideration for the safety of the grizzly population. I implore you to consider not hunting them because of the reasons listed above and many more.	FWS-R6-ES-2016-0042-0387	

While there has been some mention of importing bears into the GYE for breeding purposes, this is not the correct policy.	101			Data doubts and comments on process	I am writing in opposition to Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife because sufficient consideration has not been given to the providing of corridors for Grizzly Bears in order for the genetic health of the species. While there has been some mention of importing bears into the GYE for breeding purposes, this is not the correct policy. At present the Grizzly Bear population if the GYE is cut off from traveling for any purpose of finding suitable habitat for breeding from any other population. If a Grizzly bear were to leave either Yellowstone National Park or Grand Teton National Park for any habitat or breeding needs in order to maintain a viable genetic pool they could or would most likely be killed. And you have not taken sufficient information into consideration regarding our changing climate. Unless you proved safe passage for Grizzly Bears in order to reach viable habitat—which includes food sources necessary to their survival, you should not be opening up Grizzly bears to trophy hunting. There has never been proven the necessity for the killing of Grizzly bears for sport. Killing to remove a bear from incidents caused by humans will most likely to continue because of human desires to encroach on bear territory. Bears are never the problem. Humans are. Until you provide safe passage for Grizzly bears from one gene pool area to another you should not delist them. More than one agency (as I am almost certain you are aware) has opposed delisting based on science. Unless you wish for so few bears that their population is not viable in YNP or GTNP and the GYE you should refrain from putting the Grizzly bear in the cross hairs of a trophy hunter's rifle. You should be demonstrating that you understand what you will be causing by delisting Grizzly bears. No hunter's life depends on a dead Grizzly bear. Grizzly bears depend now on humans for their lives. No human male or female has proven the need to chop off a head and paws and skin a bear to keep his family warm.	FWS-R6-ES-2016-0042-0381	
It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned.	102			Data doubts and comments on process	The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range. This is being considered for the benefit of trophy hunters and is not based on the science above or any consideration for the safety of the grizzly population. I implore you to consider not hunting them because of the reasons listed above and many more.	FWS-R6-ES-2016-0042-0387	
And you have not taken sufficient information into consideration regarding our changing climate.	103			Data doubts and comments on process	I am writing in opposition to Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife because sufficient consideration has not been given to the providing of corridors for Grizzly Bears in order for the genetic health of the species. While there has been some mention of importing bears into the GYE for breeding purposes, this is not the correct policy. At present the Grizzly Bear population if the GYE is cut off from traveling for any purpose of finding suitable habitat for breeding from any other population. If a Grizzly bear were to leave either Yellowstone National Park or Grand Teton National Park for any habitat or breeding needs in order to maintain a viable genetic pool they could or would most likely be killed. And you have not taken sufficient information into consideration regarding our changing climate. Unless you proved safe passage for Grizzly Bears in order to reach viable habitat—which includes food sources necessary to their survival, you should not be opening up Grizzly bears to trophy hunting. There has never been proven the necessity for the killing of Grizzly bears for sport. Killing to remove a bear from incidents caused by humans will most likely to continue because of human desires to encroach on bear territory. Bears are never the problem. Humans are. Until you provide safe passage for Grizzly bears from one gene pool area to another you should not delist them. More than one agency (as I am almost certain you are aware) has opposed delisting based on science. Unless you wish for so few bears that their population is not viable in YNP or GTNP and the GYE you should refrain from putting the Grizzly bear in the cross hairs of a trophy hunter's rifle. You should be demonstrating that you understand what you will be causing by delisting Grizzly bears. No hunter's life depends on a dead Grizzly bear. Grizzly bears depend now on humans for their lives. No human male or female has proven the need to chop off a head and paws and skin a bear to keep his family warm.	FWS-R6-ES-2016-0042-0381	

3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so.	103	102	101	Data doubts and comments on process	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. ~~To sustain current population numbers, habitat conditions must also be maintained. But the delisting plan only~~	FWS-R6-ES-2016-0042-0456	
Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years.	102	103		Data doubts and comments on process	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. ~~To sustain current population numbers, habitat conditions must also be maintained. But the delisting plan only~~	FWS-R6-ES-2016-0042-0456	

Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species.	101	103		Data doubts and comments on process	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife, primarily grizzlies and	FWS-R6-ES-2016-0042-0463	
Threats to the species are increasing, not decreasing. Increasing numbers of people are living in and visiting the GYE, and some are pursuing more radically disruptive activities. Scientists and managers are just starting to get a handle on climate change and what it will mean for this area and wildlife. Fish & Wildlife Service's opinion that climate change is no problem for grizzly bears is just not credible.	103			Data doubts and comments on process	Removing grizzly bears in the Greater Yellowstone Ecosystem from the protection of the Endangered Species Act at this time would be a enormous mistake. Threats to the species are increasing, not decreasing. Increasing numbers of people are living in and visiting the GYE, and some are pursuing more radically disruptive activities. Scientists and managers are just starting to get a handle on climate change and what it will mean for this area and wildlife. Fish & Wildlife Service's opinion that climate change is no problem for grizzly bears is just not credible. There is much uncertainty about the future of important grizzly bear foods. As a pilot, flying professionally and recreationally in the GYE since the late 1980s, I have witnessed the rapid death of huge swaths of forests in the mountains, including most of the old whitebark pine stands that produced most of the pine seeds. The loss of this important bear food will take a long time to manifest itself fully or even to be understood, particularly if the other most important foods are reduced by climate change or other factors. Elk numbers could decline sharply if chronic wasting disease becomes established. Cutthroat trout, even if recovering slowly in the Yellowstone Lake area, face a bleak future as spawning streams decline due to drought effects. Moth sites in the high mountains could also diminish, and they are highly vulnerable to human disturbance. The science claimed by the government to support delisting has considerable, undisclosed uncertainty. From 1988 to 1997, I was the pilot of many official grizzly bear observation flights in the GYE, working out of Driggs, Idaho with Western Air Research. Observers I flew with varied a lot in their ability to see bears, and in their tolerance for the kind of flying best applied to finding bears. How many bears we saw during a flight seemed to have as much or more to do with the day's conditions, the observer's characteristics, and luck than anything else. Some bears ran for cover immediately, making it hard to know how many cubs a female had with her. Success was high in open areas, so we spent more time flying in those areas. It was hard to know if we saw individual bears more than once on any given flight. Lighting conditions change continually with aircraft direction and clouds, etc., so a bear that looked dark could look light, adding to the problem of distinguishing animals. Having experienced these issues, I find it hard to accept that the government knows accurately how many bears there are, based on the number of observed bears. Statistics can handle some problems, but large variations in observations cannot be avoided. This makes for very poor confidence margins. The idea that the government will know when the number declines to "500 bears" or "612 bears" is a fable. It is clear that the state game agencies want to implement grizzly bear trophy hunting as soon as they can. The killing of bears for sport and pleasure is not acceptable to me, and I believe that is true for the majority of the public. As a resident of Wyoming, I see that Wyoming Game & Fish	FWS-R6-ES-2016-0042-5038	

The science claimed by the government to support delisting has considerable, undisclosed uncertainty. From 1988 to 1997, I was the pilot of many official grizzly bear observation flights in the GYE, working out of Driggs, Idaho with Western Air Research. Observers I flew with varied a lot in their ability to see bears, and in their tolerance for the kind of flying best applied to finding bears. How many bears we saw during a flight seemed to have as much or more to do with the day's conditions, the observer's characteristics, and luck than anything else. Some bears ran for cover immediately, making it hard to know how many cubs a female had with her. Success was high in open areas, so we spent more time flying in those areas. It was hard to know if we saw individual bears more than once on any given flight. Lighting conditions change continually with aircraft direction and clouds, etc., so a bear that looked dark could look light, adding to the problem of distinguishing animals. 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The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife. primarily grizzlies and	FWS-R6-ES-2016-0042-5038	
The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, even resistant to managing a species of high importance to the non-hunting public and/or the federal government (i.e. - Gray wolves). In addition, even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management.	104			Data doubts and comments on process	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife. primarily grizzlies and	FWS-R6-ES-2016-0042-0463	

Actual numbers of grizzly bears are merely estimates as are the numbers required to support a sustainable populations for one of the slowest-reproducing mammals in North America with female grizzlies giving birth only every three years, if conditions are right.	102			Data doubts and comments on process	I am a veterinarian, a biologist and a concerned citizen and for the reasons stated below, it is my firm contention that grizzly bears should not be delisted in the Greater Yellowstone Ecosystem. Actual numbers of grizzly bears are merely estimates as are the numbers required to support a sustainable populations for one of the slowest-reproducing mammals in North America with female grizzlies giving birth only every three years, if conditions are right. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399 would be threatened by the delisting. FWS could well see more than 40 years of recovery efforts squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America.. By the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range and grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. The management of isolated populations of free-ranging carnivores like grizzly bears and wolves is flawed. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate with public input on bear management. A leaked memo I am writing to implore you to stop the proposed delisting of the Grizzly Bear in the Greater Yellowstone Ecosystem from the Federal List of Endangered and Threatened Wildlife. The reported facts and research, compiled by different researchers, is conflicting, to say the least, in regards to defining the current Grizzly Bear population as recovered. Facts will always be conflicting as scientists view their data through their lens of their inquiry. We all have a way we see the world and it profoundly influences the actions we take. Call it the uncertainty principle or the observer effect from quantum physics. Although people try to do their best, I believe it is not possible to be completely objective in how they interpret their research. That's why it's important to listen to other's perspectives and take into consideration what they, too, are observing. So what we are left with is always the intention and motivation of those interpreting the data. That's where the true wisdom comes in. Delisting is not feasible or desirable at this time for many reasons. Grave uncertainty being the main one. Uncertainty about the ongoing unpredictable effects of climate change and how that unfolding story will influence the food choices and survival of the Grizzly Bears. Uncertainty about the increased pressures of expanding human populations on the Grizzly families as more and more people move west, encroaching on their territory. That increased human presence, gobbling up the land, is only pressuring the Grizzlies into closer human contact, year by year. And lastly, the uncertainty of the unpredictable behavior of humans who seek to kill a Grizzly for sport or vengeance if Grizzly Bears are no longer protected under federal law. Threats have already been made by some to seek out and intentionally kill one of the most famous Grizzly Bear mothers, 399, in Grand Teton National Park. Yes, progress has been made, but the conditions on the ground have changed dramatically since the IGBC was set in motion almost three decades ago. It is important to base this decision to potentially delist on the ground-truthing of this present century, not in goals of past decades when this Committee was first given this honorable task of recovering the at-risk populations. It is important for you to at least consider that it may never be wise or safe to delist the Grizzly Bear. And that does not constitute failure. That represents wisdom. I thank you for your service in regards to the leadership that has been entrusted to you, by all of us, the Public trust, to safeguard the well-being of our Greater Yellowstone Grizzly Bear population. Please don't take hasty actions to delist them, based on short-term reasons such as procedure, protocol or personal legacy. I implore you to consider the long-view, which is solely your responsibility, and in your hands, as wise leaders and elders. Thank you for your crucial consideration to halt delisting process at this time. May it be so. Thank you. Lyn Dalebout	FWS-R6-ES-2016-0042-5116	
The reported facts and research, compiled by different researchers, is conflicting, to say the least, in regards to defining the current Grizzly Bear population as recovered.	101	102		Data doubts and comments on process	I am writing to implore you to stop the proposed delisting of the Grizzly Bear in the Greater Yellowstone Ecosystem from the Federal List of Endangered and Threatened Wildlife. The reported facts and research, compiled by different researchers, is conflicting, to say the least, in regards to defining the current Grizzly Bear population as recovered. Facts will always be conflicting as scientists view their data through their lens of their inquiry. We all have a way we see the world and it profoundly influences the actions we take. Call it the uncertainty principle or the observer effect from quantum physics. Although people try to do their best, I believe it is not possible to be completely objective in how they interpret their research. That's why it's important to listen to other's perspectives and take into consideration what they, too, are observing. So what we are left with is always the intention and motivation of those interpreting the data. That's where the true wisdom comes in. Delisting is not feasible or desirable at this time for many reasons. Grave uncertainty being the main one. Uncertainty about the ongoing unpredictable effects of climate change and how that unfolding story will influence the food choices and survival of the Grizzly Bears. Uncertainty about the increased pressures of expanding human populations on the Grizzly families as more and more people move west, encroaching on their territory. That increased human presence, gobbling up the land, is only pressuring the Grizzlies into closer human contact, year by year. And lastly, the uncertainty of the unpredictable behavior of humans who seek to kill a Grizzly for sport or vengeance if Grizzly Bears are no longer protected under federal law. Threats have already been made by some to seek out and intentionally kill one of the most famous Grizzly Bear mothers, 399, in Grand Teton National Park. Yes, progress has been made, but the conditions on the ground have changed dramatically since the IGBC was set in motion almost three decades ago. It is important to base this decision to potentially delist on the ground-truthing of this present century, not in goals of past decades when this Committee was first given this honorable task of recovering the at-risk populations. It is important for you to at least consider that it may never be wise or safe to delist the Grizzly Bear. And that does not constitute failure. That represents wisdom. I thank you for your service in regards to the leadership that has been entrusted to you, by all of us, the Public trust, to safeguard the well-being of our Greater Yellowstone Grizzly Bear population. Please don't take hasty actions to delist them, based on short-term reasons such as procedure, protocol or personal legacy. I implore you to consider the long-view, which is solely your responsibility, and in your hands, as wise leaders and elders. Thank you for your crucial consideration to halt delisting process at this time. May it be so. Thank you. Lyn Dalebout	FWS-R6-ES-2016-0042-5132	

The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001).USFWS's proposal also does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. Due to all of these unknowns regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population, I believe the better suited and pragmatic approach of waiting five years to see how the population is responding to these threats should be taken instead.	101	102	103	Data doubts and comments on process	Grizzlies in the GYE are facing catastrophic losses to several of their key food sources, such as whitebark pine and cutthroat trout. The service's recent research on whitebark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy whitebark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals. Moreover, grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary. Furthermore, the USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. Additionally, the USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). USFWS's proposal also does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. Due to all of these unknowns regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population, I believe the better suited and pragmatic approach of waiting five	FWS-R6-ES-2016-0042-5093	
No-one knows with verifiable, testable certainty how many grizzlies are in the GYE. There is not enough scientific basis for delisting the grizzly bear to be a sound or responsible proposition.	102			Data doubts and comments on process	Removing ESA protections for grizzlies in Idaho, Montana, and Wyoming won't be any better for them than it has been for the wolf. No-one knows with verifiable, testable certainty how many grizzlies are in the GYE. There is not enough scientific basis for delisting the grizzly bear to be a sound or responsible proposition. Please allow the grizzlies to remain in place while their population (and the surrounding ecosystem) restores itself. As a voting and taxpaying citizen of this land I expect you to hear my voice because this is my country as much as it is yours, and I care about its long-term ecological future. Yours most sincerely, Laura Marjorie Miller	FWS-R6-ES-2016-0042-5198	
I oppose this because based on the scientific data I have reviewed. Specifically, in Yellowstone Ecosystem, there are several critical issues that adversely affect the availability of food sources upon which the grizzly bear relies. These uncertainties are primarily the result of ongoing climate change in the ecosystem. I am currently associated with Montana State University where I study ecosystem responses to climate.	102			Data doubts and comments on process	I am writing to express my opposition to the delisting of the grizzly bear from protection under the the Endangered Species Act. I oppose this because based on the scientific data I have reviewed. Specifically, in Yellowstone Ecosystem, there are several critical issues that adversely affect the availability of food sources upon which the grizzly bear relies. These uncertainties are primarily the result of ongoing climate change in the ecosystem. I am currently associated with Montana State University where I study ecosystem responses to climate. There is no certainty that the food sources currently available to the grizzly will continue to be available in the near future. In fact, it is highly likely that the food sources currently available to the grizzly will decline over the very near future. Further, there is an ever-increasing threat to the bear's habitat where development is encroaching into wild places causing conflict between bears and humans. For example, when bears are unable to access the food sources that have become scarce, specifically white bark pine nuts in fall, during the hunting season, we have seen a notable increase in bear/human conflicts. Should bears be removed from the ESA, they will be vulnerable as they feed on the army cutworm moth in late summer making large numbers of them. I find the proposal to designate the bears of the GYE as a distinct population segment to be arbitrary and capricious. The GYE population will most certainly decline as their genetic diversity stagnates. It is irresponsible not to encourage continuity between the bears of the GYE and those of the Northern Continental Divide population and Cabinet Yak populations. The problem remains that there is not a population of grizzlies in the Central Idaho Wilderness. In addition to my academic career, I own a small tour business in Gardiner, Montana, Wild Bear Adventures. One of the facts that our clients always find interesting is that the grizzly bear is the slowest reproducing mammal in North America. When there are conflicts between humans and bears and a female bear is removed from the ecosystem, her future reproductive potential is an exponential loss. Further, the success of my business relies on a healthy bear population, one that has not been impacted by hunting which, as the data show is the case with wolves, they are comfortable occupying all of their habitat, increasing the chances of being viewed by visitors and increasing our opportunity to share information with the public. Therefore, for these and many other reasons too numerous for me to mention here, do not remove the grizzly bear from protection under the Endangered Species Act.	FWS-R6-ES-2016-0042-5217	

The usfws should listen to the best science rather than wishful thinking, greed, and hand-waving, touchy-feely estimates and wild-ass guesses. The USFWS is about to precipitate another catastrophic collapse of Yellowstone's grizzlies, and those who bring it about will go down in history.... literally, they will go down...	102			Data doubts and comments on process	delisting of Yellowstone grizzlies is very premature as there has been no specific study of the impacts upon the grizzlies of Yellowstone that has occurred as the result of reduction of specialized foods primarily contributing to the success of their recovery. Four specific foods have been particularly noted: seeds of the white bark pine. The seeds of this pine represents a high-fat high diet for the bears, growing at high altitudes is also kept bears from human contact to a great degree. But only 20% of the white bark pine that existed 20 years ago still exists today. Bear now forage at lower altitudes, at greater dangers of human conflict. Agriculture has reduced the moths of the cutworm moth. This food, up to 72% fat, has been called a "bear superfood", by internationally know expert David Mattson, PhD. But this food source has dropped precipitously as result of insecticides used by farmers. Introduction of piscivorous non-native fish into Yellowstone lake has resulted in drastic reduction of cutthroat trout - yet another of the main 3 or 4 high-fat and protein sources that support bear reproductivity, which in the best of times, is still remarkably slow. The usfws should listen to the best science rather than wishful thinking, greed, and hand-waving, touchy-feely estimates and wild-ass guesses. The USFWS is about to precipitate another catastrophic collapse of Yellowstone's grizzlies, and those who bring it about will go down in history.... literally, they will go down...	FWS-R6-ES-2016-0042-5279	
I will admit that there are some in the science community who disagree on the likelihood of the vitality for a healthy population after delisting. But even with the opposing views, that should be enough to push the pause button on the action of delisting.	103			Data doubts and comments on process	See attached file(s). In the attached file, I have comments on the following docket number: Number FWS-R6-ES-2016-0042. Attachments Comments on Delisting Grizzly Bears.20160331	FWS-R6-ES-2016-0042-0540	
I have been to the meetings in which I can see the FWS, Game and Fish, and other entities give in to the pressure of these groups. Isn't the job of the "Fish and Wildlife" Service to preserve and protect our fish and our wildlife? If you remove the grizzly bear from protection, you have failed these animals and the people who want to see them protected. The money that has been spent on bringing these animals back from the brink of extinction will have been for nothing if you so casually remove them from protection.	100			Data doubts and comments on process	I am against removing the Grizzly Bear in the Greater Yellowstone Ecosystem population from the Federal List of Endangered and Threatened Wildlife. I do not see anywhere that the FWS has proven that this bear is completely recovered from being endangered and in particular, the food supply upon which the grizzly bear must depend is slowly being devastated by the continued drought conditions in this ecosystem. The FWS is being pressured by ranchers and hunters who want to be able to kill these bears and eventually wipe out the entire population. This is a disgusting attack on an animal that has struggled to survive in the best of conditions. Please listen to the people who are not hunters, cattle ranchers, hunting guides who are just waiting to be able to kill a grizzly. Just like the cry to de-list the wolves, the constant din of these people to destroy endangered and threatened animals that have finally recovered in the lands they historically occupy. I have been to the meetings in which I can see the FWS, Game and Fish, and other entities give in to the pressure of these groups. Isn't the job of the "Fish and Wildlife" Service to preserve and protect our fish and our wildlife? If you remove the grizzly bear from protection, you have failed these animals and the people who want to see them protected. The money that has been spent on bringing these animals back from the brink of extinction will have been for nothing if you so casually remove them from protection. PLEASE RECONSIDER THIS TERRIBLE DECISION!	FWS-R6-ES-2016-0042-0535	
There are numerous scientific reasons why this proposed rule is un-wise, such as: declining important food resources (like whitebark pine nuts), skewed population estimates by the Interagency Grizzly Bear Study Team (IGBST), climate change impacts, genetic isolation to other grizzly bear populations, and an overall lack of scientific accountability by the IGBST (their tax payer funded grizzly bear research should be made available to independent scientists as well).	102			Data doubts and comments on process	I am writing in opposition to the proposed delisting of the Greater Yellowstone's population of grizzly bears from the Federal List of Endangered and Threatened Wildlife. There are numerous scientific reasons why this proposed rule is un-wise, such as: declining important food resources (like whitebark pine nuts), skewed population estimates by the Interagency Grizzly Bear Study Team (IGBST), climate change impacts, genetic isolation to other grizzly bear populations, and an overall lack of scientific accountability by the IGBST (their tax payer funded grizzly bear research should be made available to independent scientists as well). Until there is conclusive scientific data to prove that the Greater Yellowstone's population of grizzly bears is healthy and sustainable, they should remain on the Federal List of Endangered and Threatened Wildlife. Thank you for making these considerations in regards to the most iconic and amazing animal in the Greater Yellowstone. -Beau Fredlund Cooke City, MT	FWS-R6-ES-2016-0042-0716	

Do not delist the Grizzly from the ESL. States will immediately begin allowing the hunting of them if they are delisted. My family and I are part of the group of millions of people who travel long distances and spend a lot of money to get a glimpse of a Grizzly in the wild. According to a Fish & Wildlife Service Survey from 2011, there were 13.7 million hunters (4% of the 2011 US population) compared to 71.8 million wildlife watchers (23% of the 2011 US population). A new survey is currently being done by the FWS and the numbers are expected to decline for the number of hunters in the US. The FWS survey numbers also reflect what has been known by local and state agencies for some time now-the younger generation is not interested in hunting and killing for "sport". Based on this information alone, it is economically a no-brainer that the population of Grizzlies continue to be protected. According to FWS numbers-Hunters generated \$33.7 billion in revenue and wildlife watchers generated \$54.9 billion in revenue in 2011. Wildlife watchers, who are definitely a majority, generate much more revenue just trying to get a glimpse of a Grizzly in the wild, while hunters destroy that source of revenue for personal satisfaction/gain. It is time to give the immense population that is against delisting, a voice in decision making for our national resources!	102			Data doubts and comments on process	Do not delist the Grizzly from the ESL. States will immediately begin allowing the hunting of them if they are delisted. My family and I are part of the group of millions of people who travel long distances and spend a lot of money to get a glimpse of a Grizzly in the wild. According to a Fish & Wildlife Service Survey from 2011, there were 13.7 million hunters (4% of the 2011 US population) compared to 71.8 million wildlife watchers (23% of the 2011 US population). A new survey is currently being done by the FWS and the numbers are expected to decline for the number of hunters in the US. The FWS survey numbers also reflect what has been known by local and state agencies for some time now-the younger generation is not interested in hunting and killing for "sport". Based on this information alone, it is economically a no-brainer that the population of Grizzlies continue to be protected. According to FWS numbers-Hunters generated \$33.7 billion in revenue and wildlife watchers generated \$54.9 billion in revenue in 2011. Wildlife watchers, who are definitely a majority, generate much more revenue just trying to get a glimpse of a Grizzly in the wild, while hunters destroy that source of revenue for personal satisfaction/gain. It is time to give the immense population that is against delisting, a voice in decision making for our national resources!	FWS-R6-ES-2016-0042-0728	
I believe that the decision in not based on sound scientific information, but rather on the pressure of political entities. Because it is not defensible to make such important decisions based on political pressure, science is manipulated and misinterpreted to develop convenient findings to support the political decision.	102	101		Data doubts and comments on process	Removing the Grizzly Bear from the endangered species list is a mistake that will ensure the need to relist this magnificent predator. I believe that the decision is not based on sound scientific information, but rather on the pressure of political entities. Because it is not defensible to make such important decisions based on political pressure, science is manipulated and misinterpreted to develop convenient findings to support the political decision. Predators play an overwhelmingly important role in the health of our ecosystems. However, throughout the history of the United States, our government and the general public have fostered a deep seated fear and demonization of predators, especially the large predators. This is evidenced by the near eradication of the Grizzly Bear and wolves and the widespread hatred of an essential species. Fear of predators has been institutionalized and the elimination of predators sold as a necessary program to protect livestock, and the western way of life. However, it doesn't take much effort to see the damage that such programs have on our ecosystems and the other problems that arise when predators are reduced to unsustainable population levels. Wildlife management decisions are too often based on the need to generate revenue and a perceived notion that large predators diminish our enjoyment of hunting big game species such as mule deer, elk. Certainly predators kill these species, but if we would allow the natural cycles of predators and game species to occur, we would find that our hunting would improve over time. We have created a hunger for revenue generated by the marketing of permits to kill large predators such as Grizzlies. What could stoke the prestige and ego more than shooting an evil killing machine as notorious as the Grizzly. Unfortunately, wildlife management decisions regarding the hunting of predators are often made with incomplete knowledge about the numbers of animals, the limiting effects of diminished habitat and the isolation of species populations. Certainly climate change is having a negative impact on our wildlife but the political nature of this type of environmental deterioration is not taken into account. It is no secret that changing winter conditions in the northern Rockies is having a devastating impact on our forests. I have seen a significant change in the overall health of forests in the Sawtooth Mountains in Idaho. Most people might be surprised that a vital source of nourishment for the carnivorous beast, the Grizzly Bear, are pine nuts. Climate change has led to the rapid decline of the white bark pine and its production of nuts which are essential to the Grizzly. Wildlife managers have not given this fact enough weight in their decision making. After all, Grizzlies are carnivores, living by eating our precious game animals. Well, it is not so easy to replace an essential food source as important as the white bark pine nut is to the Grizzly. Imagine the impact on our food options if corn or wheat production was drastically reduced by some disease. Other important sources	FWS-R6-ES-2016-0042-0750	

For the FWS to say " Therefore , we conclude that the effects of climate change do not constitute a threat to the (Yellowstone Grizzly Bear) population now, nor are they anticipated in the future" is a gross misrepresentation of the actual facts and conditions in the park and surrounding ecosystems. Having spent my entire life in the area I have personally seen the effects of climate change on 95% of the White Bark Pine (their nuts being the important food supply for Grizzly Bears) from huge swaths of forest being attacked by Pine Beetle. Further, Yellowstone Cutthroat populations (Whirling Disease) not to mention the introduction of invasive Lake Trout have likewise effected the Grizzly Bear food supply. Epic droughts have caused mega catastrophic fires in the region which are a direct result of Climate Warming. These among many other examples are just a few of the issues which will effect the future of the Yellowstone Grizzly bear.The economics of a few hunting guides taking hunters, or independent hunters, using the areas surrounding the park are nothing compared to the economic engine of wildlife viewing in and around the park and the economic benefits from outdoor recreation for the towns and visitors coming to Yellowstone and the Grand Tetons.The Iconic Grizzly Bear is the face of Wilderness and of our National Parks. Do Not de-list the Yellowstone Grizzly Bear, this would be folly and the most damaging example of poor wildlife management.	102	103		Data doubts and comments on process	As a native born resident of Wyoming (born Casper-1950) I am very disturbed that the Fish and Wildlife would consider de-listing the Yellowstone Grizzly Bear. I am a hunter and fly-fisherman and I have spent my entire life visiting the park and surrounding wilderness areas. My three daughters have grown up camping in the Park and mountains there. In fact our frequent trips there, when they were children , were the cornerstone of their respect for Wilderness and Nature. The iconic Yellowstone Grizzly Bear , the apex predator of that ecosystem, deserves continued long term protection. The present small population of 700 bears can not afford being hunted as it's in a closed ecosystem and needs a population which can find migration corridors to other habitats and systems, such as Glacier Park, The Bitterroot Selway and River of No Retun Wilderness areas to provided genetic diversity and healthy Grizzly populations. For the FWS to say " Therefore , we conclude that the effects of climate change do not constitute a threat to the (Yellowstone Grizzly Bear) population now, nor are they anticipated in the future" is a gross misrepresentation of the actual facts and conditions in the park and surrounding ecosystems. Having spent my entire life in the area I have personally seen the effects of climate change on 95% of the White Bark Pine (their nuts being the important food supply for Grizzly Bears) from huge swaths of forest being attacked by Pine Beetle. Further, Yellowstone Cutthroat populations (Whirling Disease) not to mention the introduction of invasive Lake Trout have likewise effected the Grizzly Bear food supply. Epic droughts have caused mega catastrophic fires in the region which are a direct result of Climate Warming. These among many other examples are just a few of the issues which will effect the future of the Yellowstone Grizzly bear. The economics of a few hunting guides taking hunters, or independent hunters, using the areas surrounding the park are nothing compared to the economic engine of wildlife viewing in and around the park and the economic benefits from outdoor recreation for the towns and visitors coming to Yellowstone and the Grand Tetons. The Iconic Grizzly Bear is the face of Wilderness and of our National Parks. Do Not de-list the Yellowstone Grizzly Bear, this would be folly and the most damaging example of poor wildlife management.	FWS-R6-ES-2016-0042-0755	
The effects of climate change on habitat, food, life spans, is an unknown factor at this time. We simply know it is significant.	103			Data doubts and comments on process	This consideration is unconscionable. First the wolves, and now the grizzlies? You have biology backgrounds(I hope) and some understanding of how our ecosystem works...what are you thinking of? It seems that we finally are fortunate enough to bring back these major figures in the eco system and as soon as they are returned, we cease to protect them. The effects of climate change on habitat, food, life spans, is an unknown factor at this time. We simply know it is significant. PLEASE, give this outrageous proposal your most considerate and deliberate thought. It is not time to remove the grizzly from protection. For the sake of the Yellowstone eco system and generations to come, let them live in peace. Let some small segment of our. World remain wild.	FWS-R6-ES-2016-0042-0785	
Unfortunately, wildlife management decisions regarding the hunting of predators are often made with incomplete knowledge about the numbers of animals, the limiting effects of diminished habitat and the isolation of specie populations.	102	103		Data doubts and comments on process	Removing the Grizzly Bear from the endangered species list is a mistake that will ensure the need to relist this magnificent predator. I believe that the decision is not based on sound scientific information, but rather on the pressure of political entities. Because it is not defensible to make such important decisions based on political pressure, science is manipulated and misinterpreted to develop convenient findings to support the political decision. Predators play an overwhelmingly important role in the health of our ecosystems. However, throughout the history of the United States, our government and the general public have fostered a deep seated fear and demonization of predators, especially the large predators. This is evidenced by the near eradication of the Grizzly Bear and wolves and the widespread hatred of an essential species. Fear of predators has been institutionalized and the elimination of predators sold as a necessary program to protect protect livestock, and the western way of life. However, it doesn't take much effort to see the damage that such programs have on our ecosystems and the other problems that arise when predators are reduced to unsustainable population levels. Wildlife management decisions are too often based on the need to generate revenue and a perceived notion that large predators diminish our enjoyment of hunting big game species such as mule deer, elk. Certainly predators kill these species, but if we would allow the natural cycles of predators and game species to occur, we would find that our hunting would improve over time. We have created a hunger for revenue generated by the marketing of permits to kill large predators such as Grizzlies. What could stoke the prestige and ego more than shooting an evil killing machine as notorious as the Grizzly. Unfortunately, wildlife management decisions regarding the hunting of predators are often made with incomplete knowledge about the numbers of animals, the limiting effects of diminished habitat and the isolation of specie populations. Certainly climate change is having a negative impact on our wildlife but the political nature of this type of environmental deterioration is not taken into account. It is no secret that changing winter conditions in the northern Rockies is having a devastating impact on our forests. I have seen a significant change in the overall health of forests in the Sawtooth Mountains in Idaho. Most people might be surprised that a vital source of nourishment for the carnivorous beast, the Grizzly Bear, are pine nuts. Climate change has led to the rapid decline of the white bark pine and its production of nuts which are essential to the Grizzly. Wildlife managers have not given this fact enough weight in their decision making. After all, Grizzlies are carnivores, living by eating our precious game animals. Well, it is not so easy to replace an essential food source as important as the white bark pine nut is to the Grizzly. Imagine the impact on our food options if corn or wheat production was drastically reduced by some disease. Other important sources	FWS-R6-ES-2016-0042-0750	

Our Wyoming, Idaho and Montana Game and Fish departments who are also part of the IGBC, will argue that Yellowstone and Grand Teton Parks are the safety zone firewall that will protect the grizzlies. I counter point; if Yellowstone and Grand Teton Parks could protect them, why did the population crash to start with? That is why the alphabet soup of agencies of the IGBC in 1993 created the more logical and demonstrably effective "Grizzly Bear Recovery Zone"; known today as the "Primary Conservation Area (PCA)."The PCA has fostered the glacial pace yet successful recovery we enjoy today. This Primary Conservation Area is 9,210 square miles equaling 5,893,760 acres. This original "Grizzly Bear Recovery Zone" has to be the firewall "no hunting zone" to insure the "continuity of achievement" of the Grizzly Bear Recovery effort.Wyoming Game and Fish thinks 7,229 square miles equaling 4,626,560 acres is adequate. "I'm sure Montana and Idaho Game and Fish agree. Clearly that would infringe on the range the Grizzly Recovery efforts deemed important essential recovery habitat.The IGBC Recovery Plan states; The PCA contains "The Minimum " seasonal habitat components needed to support the recovered grizzly bear population, as defined in the Recovery Plan. "A recovered population is one having a high probability of existence into the foreseeable future (greater than 100 years)." (Note) This statement in the recovery plan was drafted before the crash of the essential food sources, white bark pine and the	101	102	103	Data doubts and comments on process	The delisting of the Yellowstone Grizzly Bear is imminent and this we should celebrate ("dancing"). Now that our happy dance is complete, we must insure the grizzlies' recovery is permanent. To insure "continuity of achievement," the grizzlies need a firewall to protect the success of this achievement from human foible. Many will argue differently, but I believe that our "isolated" population of grizzlies has recovered; albeit tenuously, and I don't have a problem with the delisting. The problem is, as the delisting of the wolves demonstrated; a hunting season for grizzlies will soon follow. I believe a hunting season is a freight train coming at us we can't stop! Managing grizzly bears for the Game and Fish departments is expensive, and they desire to recoup some expense with grizzly bear hunting tags, but their real savings will be the killing of bears. All we can do is hope to mitigate the outcome by providing a firewall, a fall back zone where the grizzlies will never be hunted, an incubator of sorts. Social tolerance" is the term used by grizzly managers when considering the human factor intersect. Social acceptance is a tough sell for those who fear predators might hurt their children along the wildland-urban interface; grizzly advocates must understand this as we move forward with our mitigative efforts to insure a long-term grizzly recovery. If the residents on the outskirts of our towns and ranchers along the periphery of your National Forests can protect their property, social acceptance for grizzlies in our wild areas will grow. If people keep getting attacked outside Livingston, and grizzlies are harvesting apples in St. Anthony, or trying to den in garages in Driggs, social tolerance will shrink. We need to cultivate social tolerance, not risk it. My social tolerance for grizzlies is high because I have one of the 155+ easily discernable jobs created by grizzly bear tourism. I consider them "Revenue Bears," Game and Fish doesn't. Every hotel and restaurant of the Greater Yellowstone communities are beneficiaries of "Revenue Bear" tourism. I wish we wouldn't have a hunt, but as a pragmatist, I don't have a problem with a limited hunting season for the grizzly bears. Our Wyoming, Idaho and Montana Game and Fish departments who are also part of the IGBC, will argue that Yellowstone and Grand Teton Parks are the safety zone firewall that will protect the grizzlies. I counter point; if Yellowstone and Grand Teton Parks could protect them, why did the population crash to start with? That is why the alphabet soup of agencies of the IGBC in 1993 created the more logical and demonstrably effective "Grizzly Bear Recovery Zone"; known today as the "Primary Conservation Area (PCA)." The PCA has fostered the glacial pace yet successful recovery we enjoy today. This Primary Conservation Area is 9,210 square miles equaling 5,893,760 acres. This original "Grizzly Bear Recovery Zone" has to be the firewall "no hunting zone" to insure the "continuity of achievement" of the Grizzly Bear Recovery effort. Wyoming Game and Fish thinks 7,229 square miles equaling 4,626,560 acres	FWS-R6-ES-2016-0042-0787	
The loop hole that these so called conservation groups /Anti hunting groups have figured out that if they win on a technicality there Lawyers get paid with are Tax money and fees that we pay to hunt if we close that loop hole then and only then can all groups join together and use Science and research to make real educated decision on these subjects. Instead of lining there pockets and there Lawyers pockets with taxes and all the fees that hunters and people who love the outdoors. We could do a lot more for wild places and wild animals off all kinds if we spent the money using science and research and not paying lawyers fees.	100			Data doubts and comments on process	I think the best way to handle all wildlife management is by the state not the Federal government and the anti hunting groups.The state wildlife agency have biologists and actual Science behind them . the Anti Hunting groups that keep fighting the de-listing only want to stop it so they can pocket are tax's and fees in Lawyers fees when they win on a small technicality. If they are really interested in protecting Grizzly and Wolfs take they big money that the Government pays them when the win over a technicality with no Science or research behind them take the Lawyer fees and invest it into conservation instead of there pocket book We the people that invest all are money into to Tags hunting gear, gas and everything that comes with Hunting its are Taxes that help fund these programs and all these anti hunting origination that are wasting millions of are Taxes to fight these things in court and they get there lawyer fees buy winning on some technicality If they are really conservation organization stop paying them the lawyer fees even if they win on a technicality and we could see how much longer they would fight all de-listing . The Federal government should go with Science and research that each State does on all these matters and Stop wasting the Tax payers money by letting these groups keep going to court and stopping what the fish and game science tells them. The loop hole that these so called conservation groups /Anti hunting groups have figured out that if they win on a technicality there Lawyers get paid with are Tax money and fees that we pay to hunt if we close that loop hole then and only then can all groups join together and use Science and research to make real educated decision on these subjects. Instead of lining there pockets and there Lawyers pockets with taxes and all the fees that hunters and people who love the outdoors. We could do a lot more for wild places and wild animals off all kinds if we spent the money using science and research and not paying lawyers fees. Sorry for the soap box statements But if Science and research says de-list then de-list and stop all the expensive agreements and spend the taxes more wisely. There would be less law suites if the Federal government closed the loop hole the lawyer fees get paid back to the Lawyers if they win on a technicality and move forward with letting the States handle the wildlife they are the ones with the knowledge to control the population of endanger species and all species of animal's BECAUSE HUNTING IS TRUE CONSERVATION and only with hunting can there be a balance	FWS-R6-ES-2016-0042-0815	

As one who lives, works, hunts, fishes, photographs, and recreates in grizzly bear habitat, I believe that despite biologist's best efforts the estimates of population numbers are quite a bit lower than actual true numbers of individual. A few biologists just can't adequately cover such vast acreage to accurately count a very mobile and nearly invisible population of largely nocturnal animals. However, the semi-ephemeral sign they leave behind, particularly in mud and snow, provides good records of sizes and ages, as well as numbers of individuals in local populations. The biologist's numbers, even though they are likely under counting the real population, indicate recovery. And these numbers do so without the help of this "anecdotal" information from trained wildlife professionals such as myself.	101	102	103	Data doubts and comments on process	Thanks for putting this out for public comment. It is long since time to de-list the grizzly bear (<i>Ursus arctos horribilis</i>) in the lower-48 states/Yellowstone ecosystem. As one who lives, works, hunts, fishes, photographs, and recreates in grizzly bear habitat, I believe that despite biologist's best efforts the estimates of population numbers are quite a bit lower than actual true numbers of individual. A few biologists just can't adequately cover such vast acreage to accurately count a very mobile and nearly invisible population of largely nocturnal animals. However, the semi-ephemeral sign they leave behind, particularly in mud and snow, provides good records of sizes and ages, as well as numbers of individuals in local populations. The biologist's numbers, even though they are likely under counting the real population, indicate recovery. And these numbers do so without the help of this "anecdotal" information from trained wildlife professionals such as myself. The ESA was not intended to leave species on the list indefinitely. It was intended to identify, protect, and recover species so they are no longer considered imperiled. In this case the Act has reached its goal of identification of a species under threat locally (not globally, by the way), and to work toward its recovery in numbers of individuals until it has reached a viable population. This has been accomplished, and accomplished despite the decline of whitebark pine or trout in certain streams. These bears are generalists and can and will seek out alternate food sources - as they have demonstrated in areas where neither of the above-referenced food species even exist. The decline of a single particular species cannot control the success or failure of a diet generalist. It is incumbent upon the UFSWS to obey the law, acknowledge the population recovery data, and to de-list the species in the lower-48 states. It is time to let the bears be bears, allow them to be just another species of wildlife making a living in appropriate habitat, and to celebrate the fact that they are still out there making the wilderness wild.	FWS-R6-ES-2016-0042-1205	
So my primary technical opposition is that the number of bears the computer modeling guesses are present isn't necessarily so. And you shouldn't risk the viability of a species on the plus or minus, error margin inherent in any form of computer modeling.	102			Data doubts and comments on process	I oppose deregulation. I'm a lifetime Wyoming resident; a hunter, and an attorney familiar with various forms of computer simulation schemes, particularly weather, air pollution, and fire behavior. They are all valuable, but also very vulnerable to error. So my primary technical opposition is that the number of bears the computer modeling guesses are present isn't necessarily so. And you shouldn't risk the viability of a species on the plus or minus, error margin inherent in any form of computer modeling. I am also a hunter. But I am disgusted by the rabid enthusiasm so many hunters, outfitters, and wildlife managers have for the possibility to kill a grizzly bear. We live in an in-holding on Pacific Creek, north of Jackson. We live in the bears' habitat. They visit us. We practice good bear awareness and love the creatures. They are also very economically significant as an attraction to tourists. Why kill them when they are so valuable? We have made a multi-million dollar investment in saving the grizzly. Why let that be money down the toilet, a victim of computer modeling vagueness and a voracious appetite to kill? It reminds me of times when death row prisoners fall ill and are nursed back to health so they can be executed. Bottom line - again - I oppose delisting. Gary Shockey Moran, WY. garyshockey@msn.com 307 690 8060	FWS-R6-ES-2016-0042-5344	
Climate change effects on Yellowstone's grizzlies are dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. A	103	102		Data doubts and comments on process	I oppose delisting of the Yellowstone population of grizzly bears. The species should not be removed from the Federal List of Endangered and Threatened Wildlife. In 2015, approximately 70 bears died. This represents about 10% of the total population for the slowest reproducing mammal in North America. This mortality rate is not sustainable. The 10% rate occurred even with federal protection of the Threatened and Endangered Species act. Removing such protection and placing it with Idaho, Montana, and Wyoming is incompatible with a sustainable population. These three states have clearly demonstrated hostility to co-existence with large carnivores and seem to view them only as unwanted pests or a commodity for revenue through hunting licenses, etc. Demonstrated, real-world sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Climate change effects on Yellowstone's grizzlies are dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. Four critical foods make up the diet of grizzlies in the Yellowstone ecosystem: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. The expanding range of Yellowstone's grizzlies is depicted in The Rule as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). A more reasonable hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity	FWS-R6-ES-2016-0042-5355	

PS is requesting that if a new estimation model other than Chao2 is used in the future, the states will recalibrate the population thresholds (i.e., minimum and average numbers of bears) and proportions of allocated hunter harvest based on the estimates provided by the new model in comparison to Chao2. We look forward to working with the USFWS and other members of IGBST to ensure that these issues are addressed in the Proposed Rule, Conservation Strategy and/or state grizzly bear management plans, as appropriate.	101	102		Data doubts and comments on process	United States Department of the Interior NATIONAL PARK SERVICE 12795 West Alameda Parkway P.O. Box 25287 Denver, Colorado 80225-0287 REPLY REFER TO: May 10, 2016 VIA ELECTRONIC MAIL NO HARD COPY TO FOLLOW Memorandum To: Director, U.S. Fish & Wildlife Service From: Intermountain Regional Director, National Park Service Subject: NPS Comments on Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife and Final Draft 2016 Conservation Strategy, Docket ID: FWS-R6-ES-2016-0042 The National Park Service (NPS) appreciates the opportunity to provide comments on the Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife and the associated draft Conservation Strategy. The attached review comments were prepared by staff from Yellowstone National Park (YELL), Grand Teton National Park (GRTE), John D. Rockefeller Jr. Memorial Parkway (JODR), and NPS Regional and Washington Offices. NPS reviewers noted that the U.S. Fish and Wildlife Service (USFWS) has done an excellent job of structuring the argument for delisting of the Greater Yellowstone Ecosystem (GYE) population of grizzly bears and that the state of the science is well presented. Upon delisting of the GYE grizzly bear, the states of Wyoming, Montana, and Idaho along with the NPS, U.S. Forest Service (USFS), Bureau of Land Management (BLM) and tribes will collectively co-manage this species and habitat within the identified Demographic Monitoring Area (DMA). This will require careful coordination and collaboration to effectively manage bears which do not recognize jurisdictional boundaries. The NPS is committed to working closely and collaboratively with the USFWS and our other partners to develop and implement a cooperative management framework for this wide-ranging species while recognizing and respecting each partner's jurisdiction, mission, values and interests. The NPS continues to focus on supporting the delisting process while trying to ensure values of the NPS are considered in management strategies and actions. Grizzly bears are a premier wildlife attraction for visitors to YELL, GRTE and JODR; and those visitors bring tens of millions of dollars into the regional economy. The bears contribute to the public's enjoyment and sense of pride in our conservation heritage. We seek to ensure that any future grizzly bear harvests within the GYE be conducted in a manner that: 1) respects the NPS mission; 2) protects regional economic benefits and the enjoyment of bear watching; 3) reduces the risks associated with wounded bears entering NPS units; and 4) limits the likelihood that well-known or transboundary bears will be harvested. The attached NPS comments on the Proposed Rule and draft Conservation Strategy reflect many of the same key issues or themes that the NPS opposes delisting of the Yellowstone population of grizzly bears. The species should not be removed from the Federal List of Endangered and Threatened Wildlife. In 2015, approximately 70 bears died. This represents about 10% of the total population for the slowest reproducing mammal in North America. This mortality rate is not sustainable. The 10% rate occurred even with federal protection of the Threatened and Endangered Species act. Removing such protection and placing it with Idaho, Montana, and Wyoming is incompatible with a sustainable population. These three states have clearly demonstrated hostility to co-existence with large carnivores and seem to view them only as unwanted pests or a commodity for revenue through hunting licenses, etc. Demonstrated, real-world sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. 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Four critical foods make up the diet of grizzlies in the Yellowstone ecosystem: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. The expanding range of Yellowstone's grizzlies is depicted in The Rule as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). A more reasonable hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity	FWS-R6-ES-2016-0042-5325	
The grizzly population of the Yellowstone ecosystem is isolated from all other grizzly populations (pp. 13190-13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. x Accurately estimating the number of bears in the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review. x There has been a lack of transparency about making taxpayer funded data (for which the IGBST have maintained an exclusive monopoly) available for scrutiny by the larger scientific community. All raw data on grizzly bears collected by government agencies should be made available to independent scientists. In view of the wide disagreement about delisting decisions, the USFWS should establish a review panel of independent	101	102	103	Data doubts and comments on process	I oppose delisting of the Yellowstone population of grizzly bears. The species should not be removed from the Federal List of Endangered and Threatened Wildlife. In 2015, approximately 70 bears died. This represents about 10% of the total population for the slowest reproducing mammal in North America. This mortality rate is not sustainable. The 10% rate occurred even with federal protection of the Threatened and Endangered Species act. Removing such protection and placing it with Idaho, Montana, and Wyoming is incompatible with a sustainable population. These three states have clearly demonstrated hostility to co-existence with large carnivores and seem to view them only as unwanted pests or a commodity for revenue through hunting licenses, etc. Demonstrated, real-world sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Climate change effects on Yellowstone's grizzlies are dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. Four critical foods make up the diet of grizzlies in the Yellowstone ecosystem: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. The expanding range of Yellowstone's grizzlies is depicted in The Rule as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). A more reasonable hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity	FWS-R6-ES-2016-0042-5355	

Until we know more about the potential impacts of these serious threats to the Yellowstone grizzlies, I urge you to err on the side of caution and not delist the population at this time.	103			Data doubts and comments on process	While I greatly respect, appreciate and applaud your tremendous and successful efforts to help Yellowstone grizzly bear populations recover from the threat of extinction, there are too many legitimate concerns -- voiced by some very prominent grizzly bear biologists, managers and other experts -- to remove the Yellowstone grizzly population from the Endangered Species Act at this time. I urge you to err on the side of caution and ensure these concerns and threats regarding grizzlies are better understood and dealt with before you delist them. Climate change and its impacts on grizzly bear habitat, behavior and food selection is perhaps the greatest threat to the Yellowstone grizzlies. These threats and potential impacts are not yet fully understood. With traditional and critical food sources such as whitebark pine nuts, cutthroat trout, army cutworm moths, wild berries, elk and bison already on the decline, grizzlies are already wondering farther and into new territory in search of other food. This puts them in increasing conflict with humans, which means increased mortality for bears. I do realize that grizzly bears are adaptable, opportunistic omnivores, but the impacts of them adapting to new food sources has not been adequately addressed and is not yet fully understood. That, combined with a growing human population and other associated threats to grizzly habitat, adds up to some serious and legitimate concerns about the future of Yellowstone grizzlies. There are also other, legitimate concerns about how state management of grizzly bears might impact the ability of grizzly bears to expand through critical linkage zones and eventually connect with other populations to help ensure the long-term genetic health and viability of the Yellowstone grizzly populations. Until we know more about the potential impacts of these serious threats to the Yellowstone grizzlies, I urge you to err on the side of caution and not delist the population at this time. We have come a long way in the recovery of grizzly bears in the Yellowstone ecosystem; let's ensure the long-term health, viability and survival of these bears is truly secure before acting too hastily. The bears deserve more time, caution and consideration. Thank you for your consideration, and thanks again for all you have done and continue to do to help grizzly bears recover.	FWS-R6-ES-2016-0042-5387	
I oppose allowing trophy hunting of bears. This type of hunting has far more to do with economic opportunism than bear management. The states of MT, WY and ID have shown a strong predilection for hunting, almost as a philosophical goal, rather than necessarily the best management option. I do not support managing the GYE bear population for a target population of 674 bears, and encouraging the discretionary harvest (hunting) of independent bears to maintain this population target. Rather, the GYE grizzly population should be allowed to expand, if it can. (And I am not at all convinced that the GYE population will continue to increase, given known disruptions to its primary food sources, and our lack of knowledge about the sustainability of whatever they are currently using as alternatives.) It would be advantageous for recovery to encourage independent males and females to leave the GYE area and connect with adjacent populations, improving genetic diversity and expanding the overall geographic extent of the species.	101			Data doubts and comments on process	See Attached Attachments Weiner Gary	FWS-R6-ES-2016-0042-1229	
With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting?	103			Data doubts and comments on process	I oppose the delisting of Grizzly Bears on the following grounds: - There are too many unknowns in climate/food source/habitat right now. - We just spent millions of dollars and it has taken 40 years to increase the bear population from 125 to 725 (demonstrating the length of time for reproduction) With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting?	FWS-R6-ES-2016-0042-1361	

It is time for the USFWS to stop bowing to the pressure of special interests and to instead do the job it is supposed to do: Protect and preserve endangered and threatened species using the BEST AVAILABLE SCIENCE.	102			Data doubts and comments on process	I have worked in Yellowstone National Park as a Biological Science Technician, and thus have had the great fortune to be able to observe, study, and learn about Grizzly Bears. I am writing in opposition to the proposed delisting of Yellowstone Grizzlies. This proposal to delist Grizzlies creates an environment where the lives of these bears will be cheapened. Indeed, Wyoming, Idaho, and Montana are chomping at the bit to kill Grizzlies, and have already divided up the number of bears that each state should be permitted to kill. Is this all that Grizzly lives are worth? As trophies or rugs to throw on the floor? Under this proposal, Grizzlies will be killed at any time for almost any reason. Grizzly bears tend to feed in open country, and will make easy targets. One of their most important food sources is the army cutworm moth, found in high open scree fields above timberline in summer. Grizzlies gather together in these areas, knocking over rocks and consuming the moths. Hunting Grizzlies under these conditions is not sport—it is complete slaughter. Hunting the slowest reproducing land mammal in North America and expecting that animal to still thrive reflects utter ignorance and foolhardiness on the part of those who have proposed the delisting of Grizzlies. A very important thing that USFW is in denial about is climate change, which will most certainly have an effect on the future lives of Grizzlies. Climate change itself is sufficient reason to never delist Yellowstone Grizzlies. But climate change has already proven to be detrimental to Grizzlies. For hundreds of years, the park's Grizzlies have fed on nuts from the whitebark pine. The nut is extremely nutritious and mother Grizzlies who eat pine nuts have more cubs and better survival rates. Whitebark pine forests grow at high elevations in remote places, and thus help to separate vulnerable young and mother bears from hunters at lower elevations outside the park during hunting season. The pine nut, Yellowstone's most important Grizzly food, disappeared approximately ten years ago when winter temperatures warmed to the point where mountain pine beetle larva could spend winters in the pine trees' bark. With the arrival of summer, adult beetles destroy these trees. By 2009, 95 percent of the mature, cone-bearing trees were "functionally extinct," in the words of retired Forest Service biologist Jesse Logan. It is doubtful that whitebark pines will return. The USFWS has admitted that this food source is disappearing, yet has the audacity to say that its disappearance "has had no profound negative effects on Grizzly bears at the individual or population level." Such a statement flies in the face of the best available science, and shows that the USFWS is pandering to special interests rather than adhering to scientific facts. In addition to the destruction of whitebark pines, climate change will bring more dry weather to the Yellowstone region that will degrade the habitat and the carrying capacity for Grizzlies. The federal government's denial about how climate change effects the current and future lives of Grizzlies, and its	FWS-R6-ES-2016-0042-1355	
Finally, the study ended in 2014. We're halfway to 2017. There have been significant population losses in the intervening years.	103			Data doubts and comments on process	See Attached Attachments Dickinson Sarah	FWS-R6-ES-2016-0042-1349	
It is also important to note that the Grizzly bear was unsuccessfully delisted in 2007 and returned only two years later to the Endangered Species Act because we failed to protect the species	104			Data doubts and comments on process	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	
Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, (cutthroat trout and especially Whitebark Pine) diminish. There are too many unknowns in climate/food source/habitat right now. The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (Gray Wolves).	102	103		Data doubts and comments on process	_____ Grizzly bears in the Greater Yellowstone Ecosystem have benefited greatly from ESA protections but are not even close to fully recovered in the area, and are very vulnerable. It has taken 40 years of protections to get the population where it is. Losing ESA protections means they would be immediately hunted Grizzly hunters, which would set population numbers in an immediate decline. The USFWS proposal to delist the grizzly not only puts a stop to this recovery, it will quickly QUICKLY reverse it. This would turn management of this iconic species over to the states and subject these animals to trophy hunting seasons in Montana, Idaho and Wyoming. Removing federal protections from this one small, isolated population and immediately hunting them will likely start an immediate decline back towards extinction. We do not recover species from the ESA, to delist and immediately begin hunting them. This is not the intention of the Endangered Species Act. The ESA is not a game farm plan. The purpose of the ESA is to protect and recover imperiled species and the ecosystems upon which they depend. It was designed to protect critically imperiled species from extinction as a "consequence of economic growth and development untempered by adequate concern and conservation." The U.S. Supreme Court found that "the plain intent of Congress in enacting" the ESA "was to halt and reverse the trend toward species extinction, whatever the cost. To delist species, several factors are considered: the threats are eliminated or controlled, population size and growth, and the stability of habitat quality and quantity. The threats are not eliminated nor controlled, but greater than ever. Habitat quality and quantity are currently unstable, and further unsustainable if delisted. The direct and indirect threats to the grizzly are enormous. The loss of key food sources due to climate change, slow reproductive rates, and the fact that the state plans to "manage" and "reduce" numbers through trophy hunts guarantee an unsustainable future for the species. The American public overwhelmingly wants grizzly bears protected for future generations, not killed by a few trophy hunters. Grizzly bears are a wildlife icon that have been a part of the American West and been integral to the Yellowstone region for centuries. Each year, visitors spend millions in the region, hoping to catch a glimpse of a grizzly, this beautiful and powerful symbol of our wild heritage. And as an apex predator, their presence is crucial to the health of wildlife in the Greater Yellowstone region. If the delisting goes through, the very states Wyoming, Montana, and Idaho that had their management authority over grizzlies taken away for failing to keep their populations healthy will again assume primary custodial care. Due to the extreme hostility towards wildlife predators, Wyoming's treatment of other delisted predators, namely wolves, and state policies allow wolves to be killed for any reason over 85% of the state. In the latest grizzly recovery plan, the bears are strictly protected in the core of the park	FWS-R6-ES-2016-0042-1424	

Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, (cutthroat trout and especially Whitebark Pine) diminish.	102			Data doubts and comments on process	As a frequent visitor to the GYE, I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, (cutthroat trout and especially Whitebark Pine) diminish. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned.	FWS-R6-ES-2016-0042-1483	
Obsolete methods of counting the bears are being used in jeopardy of good science.	102			Data doubts and comments on process	Do not delist the Grizzly bear for the following reasons. 1. FWS's mission is to protect wildlife, not delist. 2. The delisting will result in condemning the Grizzly to certain slaughter. 3. Climate change has decimated the pine nuts and wrecked havoc on the food sources despite what reports say. 4. Delisting is a death warrant for countless bears. 5. Obsolete methods of counting the bears are being used in jeopardy of good science. 6. This is a violation of ethics to destroy an iconic species that draws many dollars to the tri state area. Also, FWC has the obligation to protect, not sanction the killing of these magnificent creatures. They are a vital part of the West. 7. This apex predator plays a vital role. The reintroduction of the wolf in Yellowstone was a huge positive influence. 8. The 59 listed kills in 2015 is actually about half the actual kills. 9. Delisting will kill 200 bears out of the 700 in the first year. This is unacceptable and unsustainable. 10. FWC is losing credibility nationally for doing just this type of wildlife "management" which factors into "takes" that is only sugar coats the slaughter that results. 11. The ranching, hunting, grazing and other special interest groups are being overly patronized to via these unsound, lack of scientific decisions that destroy a species that many resources have gone into preserving & protecting. Do the right thing and don't even think about this ridiculous, tragic proposal that leave FWC with still another ill conceived decision that will forever taint your legacy. Thank you for the consideration. Show some vision and stand your ground.	FWS-R6-ES-2016-0042-1512	
It does not appear that declining food resources and climate change impacts have been sufficiently analyzed in the proposed grizzly bear delisting.	103			Data doubts and comments on process	I am concerned about the removal of Endangered Species Act (ESA) protections from grizzly bears in the Greater Yellowstone region. I do not feel sufficient evidence exists to support this proposed delisting and satisfy the requirement for "best science" as required by law. It does not appear that declining food resources and climate change impacts have been sufficiently analyzed in the proposed grizzly bear delisting. Grizzly bears in Yellowstone have historically depended on four critical foods: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Both whitebark pine seeds and cutthroat trout abundance have declined significantly in the past few years. The 1988 fires, blister rust, and unprecedented bark beetle outbreak have decreased the health and abundance of whitebark pine forests in Yellowstone. Cutthroat trout have also been decimated (losses greater than 90% in many important spawning streams) with the introduction of Lake Trout into Yellowstone Lake. That evidence alone suggests a greater scientific analysis of grizzly bear food source health and abundance needs to be done prior to drastic management change. Additionally cutworm moths are not a reliable food source for grizzly bears since they migrate to high elevation talus slopes from low elevation agricultural fields where they are considered a pest. Pesticides and new farming technologies such as GMO crops could dramatically reduce this grizzly bear food source. That leaves only one of four critical food sources (25%) that appears to be stable. The impact of climate change is essentially dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." There is not enough scientific evidence to validate this statement a citation of an un-referred summary publication authored by the principle author of The Rule, Dr. Servheen. It's difficult to see that as anything but bias from an outside perspective. Additionally there is ample evidence (pp. 13216 - 13217) that the Yellowstone grizzly population has already been detrimentally affected by climate change. This evidence is similarly dismissed with the statement, "grizzly bears are adaptable, they'll do just fine," of which there is little to no supporting evidence. Not to mention that in the lower 48 states, grizzly bears occupy less than 2% of their historic range. The Yellowstone grizzly bears remain completely isolated. We need a connected population of several thousand bears for true recovery and genetic viability. Removing ESA protections from Yellowstone grizzly bears is premature and violates the requisite principle of "best science" as required by law.	FWS-R6-ES-2016-0042-1513	

I respectfully disagree that the factors that endanger the long term ability of grizzlies to thrive in the GYE have been sufficiently mitigated. Furthermore the history of endangered species in the United States shows that state entities are often negligent in the preservation of endangered species	100			Data doubts and comments on process	Attachments Proposed Rule Comment	FWS-R6-ES-2016-0042-1585	
"An Ohio State University master's student, Harmony Szarek, found in her thesis that nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act." Most experts do not think these bears should be delisted. Most Americans (55% according to United States Humane Society) agree.	100			Data doubts and comments on process	Please do not remove Endangered Species Act protections from the grizzly bears of the Greater Yellowstone Ecosystem. These bears are at great risk from climate change, human conflict and a slow reproductive rate. First, temperatures in Yellowstone already 1.4F higher they were last century. Because of those rising temperatures, we have seen a massive decline (up to 95%) in whitebark pine seeds. This is one of four important food sources for the bears and particularly impacts mother bears. If this is what 1.4 degrees has done, what will happen as temperatures continue to rise. We simply don't know and therefore should proceed carefully. Second, a record number of bears died last year even while protected. Many of these occurred due to some human conflict - hunters, livestock operations etc. Indeed, just this week, the wildlife loving community was shocked to learn that an elk hunter killed famous Bear 299 (Scarface) last November. Why this information was withheld for so long makes one wonder. The more important point, though, is that these bears are being killed in record numbers EVEN WITH PROTECTIONS IN PLACE. Why on earth, with this escalated decline, would we remove protections at this time. Finally, grizzlies have one of the slowest reproductive rates in North America. A dramatic population decline could happen quite quickly if a few mother bears are killed. I agree with the majority of scientific experts on the grizzly delisting. "An Ohio State University master's student, Harmony Szarek, found in her thesis that nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act." Most experts do not think these bears should be delisted. Most Americans (55% according to United States Humane Society) agree. Listen to the scientific experts. Listen to the people. Don't Delist Grizzly Bears!	FWS-R6-ES-2016-0042-1644	
I write this letter in concern to the revision of 50 CFR 17.11 which would remove the Greater Yellowstone Ecosystem (GYE) grizzly bear to a distant population segment (DPS) from the Federal List of Endangered and Threatened Wildlife. I think this is a great mistake. For example, it has been proven that grizzly bears are an umbrella species, meaning that because they require a large habitat, this protects other organisms living in the same habitat as the grizzly bears. I understand that long-term conservation monitoring will be taken place, however, this would only monitor the grizzly bear population and not the different organisms that live in the habitat of the grizzly bears. According to this proposal, the Interagency Grizzly Bear study Team (IGBST) will continue to monitor habitat standards and adherence to the 1998 baseline. Although, a continuation to monitor the abundance, and distribution of grizzly bear foods will still just focus on one species. Like I mention earlier, the grizzly bear being on the list of endangered species has allowed many organisms to continue to stay in their habitat.	103			Data doubts and comments on process	My name is Guadalupe Cordoba. I am currently a senior at St. Mary's University. I write this letter in concern to the revision of 50 CFR 17.11 which would remove the Greater Yellowstone Ecosystem (GYE) grizzly bear to a distant population segment (DPS) from the Federal List of Endangered and Threatened Wildlife. I think this is a great mistake. For example, it has been proven that grizzly bears are an umbrella species, meaning that because they require a large habitat, this protects other organisms living in the same habitat as the grizzly bears. I understand that long-term conservation monitoring will be taken place, however, this would only monitor the grizzly bear population and not the different organisms that live in the habitat of the grizzly bears. According to this proposal, the Interagency Grizzly Bear study Team (IGBST) will continue to monitor habitat standards and adherence to the 1998 baseline. Although, a continuation to monitor the abundance, and distribution of grizzly bear foods will still just focus on one species. Like I mention earlier, the grizzly bear being on the list of endangered species has allowed many organisms to continue to stay in their habitat. In the book "Spine of the Continent: The Race to Save America's Last, Best Wilderness" by Mary Ellen Hannibal emphasize the importance of having connectivity. Animals need corridors to do their natural migrations and potential connect different populations of grizzly bears. Grizzly Bears need a large habitat to gather food, sleep, and mate. If grizzly bears are limited their habitat, we might see habitat destruction because the connectivity of grizzly bears to their natural habitat could have a major effect on other organisms. For example, when grizzly bears dig for food they aerate the soil, and while eating salmon they make food available for scavengers and transfer rich nutrients from the river to forest. I think this proposal does not take into account the full connections that the grizzly bears have with other species and the ecosystem. When a land is divided into different small patches of land, fragmented, large animals like the grizzly bears would not be able to survive. In a study by William Newmark in 1987 he said that even though a species is protected, it will not survive if they are not able to move freely. Having boundaries just limits the connectivity of the animals and affects their population and others species who depend on the habitat of the larger species like the grizzly bears. The grizzly bears being part of the Endangered and Threatened list allows the grizzly bear to have the large habitat they need. Also, as humans, we need to think about the ethics regarding the ability we have to control and alter the habitat of so many species. Aldo Leopold in his book, "A Sand County Almanac suggested that we should appreciate and protect wildlife because of its intrinsic value. That we should think of how great nature is because its nature. Also, we should think of the cultural diversity of the natural systems aside from what resources nature has to offer for people. He says that instead of trying to be the	FWS-R6-ES-2016-0042-1667	
Decisions on Grizzly bear populations cannot be based on the present, because a changing habitat pictures is rapidly evolving and more, not less, bears are needed and bears not stressed by hunting.	103			Data doubts and comments on process	See Attached Attachments Trygstad Ellen	FWS-R6-ES-2016-0042-1607	

NPCA believes the Fish and Wildlife Service proposal is incomplete and therefore currently fails to provide adequate information to support such a monumental decision. We are also extremely concerned that the National Park Service has not been adequately involved in the development of the proposal. NPCA is also extremely concerned that the Fish and Wildlife Service's proposal could allow hunting on private and state-owned land inside Grand Teton National Park and within the John D. Rockefeller Parkway.	102			Data doubts and comments on process	It took decades of hard work and millions of taxpayer dollars to restore the southernmost population of grizzly bears in North America, and we must ensure these bears continue to thrive. NPCA believes the Fish and Wildlife Service proposal is incomplete and therefore currently fails to provide adequate information to support such a monumental decision. We are also extremely concerned that the National Park Service has not been adequately involved in the development of the proposal. NPCA is also extremely concerned that the Fish and Wildlife Service's proposal could allow hunting on private and state-owned land inside Grand Teton National Park and within the John D. Rockefeller Parkway. Under the current proposal, hunting could also occur on lands directly adjacent to national parks as well as in key habitat that could link Yellowstone's grizzly bears to grizzlies from Glacier National Park.	FWS-R6-ES-2016-0042-1711	
Certainly we do not know the actual number of Yellowstone grizzly bears, and until we do, the Grizzlies should NOT be removed from the Endangered Species Act. Are there truly 700 Griz roaming Yellowstone? How do we know? are they all collared? Let us err on the side of caution and restraint and keep the Griz endangered and advise Montana, Wuyoming and Idaho of that fact. 700 Griz seems like an exaggerated number to justify delisting. Please reconsider.	102	103		Data doubts and comments on process	Certainly we do not know the actual number of Yellowstone grizzly bears, and until we do, the Grizzlies should NOT be removed from the Endangered Species Act. Are there truly 700 Griz roaming Yellowstone? How do we know? are they all collared? Let us err on the side of caution and restraint and keep the Griz endangered and advise Montana, Wuyoming and Idaho of that fact. 700 Griz seems like an exaggerated number to justify delisting. Please reconsider.	FWS-R6-ES-2016-0042-1752	
The fact is that one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services numbers. But what we do know is that at least 60 grizzlies died last year, mostly at the hand of man, and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest, if not the lowest reproductive rate of any mammal in the GYE. The continuation of such mortality rates will likely very soon result in a critically low GYE grizzly population.	102	103		Data doubts and comments on process	I am apposed to delisting grizzly bears in the Greater Yellowstone Ecosystem (GYE) for the following reasons: 1. The fact is that one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services numbers. But what we do know is that at least 60 grizzlies died last year, mostly at the hand of man, and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest, if not the lowest reproductive rate of any mammal in the GYE. The continuation of such mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work needs to be done in the GYE to prevent many of these grizzly deaths before this population can be safely delisted. Such actions as mandating that ranchers remove their garbage and carcass dumps to county facilities, the use of bear-proof garbage cans in communities, camping areas, etc. within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for hunters and other public land users in grizzly habitat need to be implemented within the GYE before grizzlies are delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations, endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate bears from other populations into the GYE to improve genetic diversity but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat in the GYE and prevent them from colonizing other lands in which they were originally found. This will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of this land is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead should be "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout and possibly even army cutworm moths populations have recently been significantly reduced due to a variety of human caused issues. More research is needed to determine how the loss of these food sources will impact the future grizzly population in the GYE. 4. GYE Grizzlies should be managed as an ecosystem population rather than separately by three	FWS-R6-ES-2016-0042-1765	
Grizzly bear mortality appears to be increasing, even though bear population is stagnant or diminishing over the past several years. It is hard for the lay person to tease out exact mortality statistics, but I find it significant that 2008 mortality when the bear was first delisted was 58, a record at that time, and that 2015 morality is now 61. Intervening years are around 50. For an animal of slow reproductive rate and marginal population this is a pessimistic trend. If delisting is accomplished as in 2008, we can expect greater mortality from hunter-related incidents as bears are drawn to elk carcasses or disturbed, and hunters can and will, shoot bears with far fewer, or no state enforced penalties.	103			Data doubts and comments on process	See attached file(s) Attachments Grizzly Bear Delisting Proposal Attn	FWS-R6-ES-2016-0042-1757	

The concept of limited poaching is introduced especially if for self defense. However, bears are not harmful creatures and many methods can be implemented to prevent these creatures from attacking the population or the properties. The Habitat Based Recovery Criteria listed within the recovery planning are not backed with much scientific evidence; instead the bears are described as "opportunistic creatures" (USF&W)	102			Data doubts and comments on process	Keep Grizzly Bears on the Endangered and Threatened Species List As well as the Grizzly Bear population has recuperated within the past few years, these numbers alone cannot guarantee aggregate protection of the species. Although many factors were taken into consideration in the proposal, two main aspects of conservation biology were forgotten: 1) the ecosystem is a synchronized whole; protecting bears would protect other species as well, especially because bears are an umbrella species to their habitats and 2) all conservation methods, though pragmatic, have no definite outcome. Grizzly Bear conservation has been dynamic and many goals were reached including raising population numbers. However, just because the population has reached a certain set number does not mean they lack vulnerabilities. One such vulnerability is climate change. The issue of climate change is addressed in the proposal with the conclusion of having little impact on the bears. Grizzly Bears used to range from Northern Canada to Northern Mexico, a vast expanse of land known to many as the "Spine of the Continent." However, Grizzly bears are also creatures of the cold and with the rise in global temperature, their comfortable habitat range will continually be expurgated Northward. Climate change has also decline snowfall in certain areas; snowfall is important to Grizzlies as they inhabit dens where snow is unlikely to melt in warmer temperatures. As noted in the proposal, many Grizzly Bear biologists within this region do not believe climate change will affect the species. Though resilient and hardy creatures, by taking them off the Endangered and Threatened Species list, we are asking them to adapt to climate change as a whole species. As noted before, Grizzly Bears are known as a keystone and umbrella species of their systematic habitats. (Berger et al 2001) Just like the Grey Wolves in Yellowstone, even their presence affects many more species including both animal and plant life forms. Using the wolves as an example in Yellowstone, when the wolves were eliminated the whole ecosystem seemed to be dying alongside. Without wolves to control the Elk populations, the Elk overpopulated and ate or trampled many plant species. Without plant species, all the other mini-ecosystems such as the riverbanks were affected negatively as well. Though bear numbers are stable at the moment, they are faced with habitual vulnerabilities such as fragmentation and poaching. As the country develops, more and more land is urbanized and deforestation is rampant. Since the founding of our country, 90% of virgin forest has been cleared away due to human activities. (UMich) More and more roadways are built to convenience the lives of humans at the cost of roaming species. Habitat fragmentation is a somber issue often overlooked; fragmentation often leads to reduction of species richness, inbreeding, and loss of sustainability of the habitat for the animal itself. (Fahrig 2003.) The concept of limited poaching is introduced especially if for self defense. However, bears are not harmful	FWS-R6-ES-2016-0042-1670	
From what I understand, one of the leading ecologists, David Mattson, doubts your population estimates. Given his 20 years in the area, then that must be a significant reason not to change their status.	102			Data doubts and comments on process	sir/madam, I am writing to ask you to not delist the Yellowstone population of Grizzly Bears from the Federal Endangered List. From what I understand, one of the leading ecologists, David Mattson, doubts your population estimates. Given his 20 years in the area, then that must be a significant reason not to change their status. With crashes in their preferred foods, then there is the risk more will venture outside of the protected areas & run the risk of quickly being killed by the trophy hunters. They have shown time & again that they have no respect for wildlife or the species status as long as they get their kill. After a killing period of a few years, then you will have no option but to readmit what will then be a fragile population, followed by the very slow growth that a small population with a slow breeding rate will need to recover. With this in mind, then the trophy hunters will go all out to get their kill in the short period that the Grizzlies are off the list, which will further increase the problem, not helped by the likely long period of time, it will take to readmit them to the endangered list. Therefore, there is only 1 solution, reject the hunters demands & keep the Yellowstone Grizzlies on the Federal Endangered List. thank you	FWS-R6-ES-2016-0042-1818	
Since we do not know how many there actually are, that they are most probably declining with the decline of their food sources, and delisting would certainly allow Montana, Idaho, & Wyoming to initiate sport hunting in Yellowstone is a travesty of the protections afforded by the Endangered Species Act.	102			Data doubts and comments on process	Delisting grizzly bears in the Greater Yellowstone Ecosystem (GYE) will enable Montana, Idaho, & Wyoming to initiate "sport hunting" of grizzlies. Trophy hunting/sport hunting has never been about managing populations. It is about hunting for sport and trophies. They don't give a damn about the population. They will hunt them until they are gone and you know it. Furthermore, nobody, including you, really knows how many grizzlies there are in the GYE. "The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing." This could cause hungry bears to look for food and be shot the minute they step outside Yellowstone. http://ricklamplugh.blogspot.com/2016/04/you-can-write-comment-that-helps-save.html So, I say to you, maintain GYE grizzly bear protections. Keep them on the list. Your attempt to delist GYE grizzly bears in the first place is an abrogation of your responsibilities under the Endangered Species Act. Since we do not know how many there actually are, that they are most probably declining with the decline of their food sources, and delisting would certainly allow Montana, Idaho, & Wyoming to initiate sport hunting in Yellowstone is a travesty of the protections afforded by the Endangered Species Act. Therefore, they must stay under the protection of the Endangered Species Act.	FWS-R6-ES-2016-0042-1817	

We have not fully gained the knowledge and evidence that the declining amount of white bark pine, cutthroat trout and other food sources for grizzly bears will not affect their long-term survival and numbers. Additionally, it can not be underestimated that the effects of climate change will continue to poorly affect the numbers and longevity of grizzly bears in the lower 48.	103			Data doubts and comments on process	To Fish and Wildlife Services and others concerned with this issue, I am writing to oppose Grizzly delisting and hope that the bigger picture of scientific evidence will be considered. This consideration is premature on many scientific levels. We have not fully gained the knowledge and evidence that the declining amount of white bark pine, cutthroat trout and other food sources for grizzly bears will not affect their long-term survival and numbers. Additionally, it can not be underestimated that the effects of climate change will continue to poorly affect the numbers and longevity of grizzly bears in the lower 48. Grizzly numbers are still at a level of uncertainty and are susceptible to many variables from year to year. The fact that nearly 60 bears were killed alone in 2015 while still protected exemplifies this instability. (known deaths) I am greatly disturbed by the recent decision of the FWS to very belatedly notify the public of the killing of a grizzly bear that occurred in November 2015. This is atrocious. The public deserves answers, facts and timely information rather than politics. Decisions like this do not provide for public trust and faith in the various agencies or states to protect grizzlies if delisted. Additionally, It is worrisome and inappropriate that the loss of habitat for grizzlies due to human encroachment is not being considered part of the factor in maintaining quality numbers of grizzlies over the long term. Human-bear conflict most often results in the dispatching of the bear...to delist the grizzly ignores the fact that grizzly bears need large amounts of habitat to exist and thrive. Their protection under the ESA allows for better management and public restraint and education when human-bear ranges overlap. These are just a few of the reasons against de-listing. Scientifically, ethically, and environmentally it is premature and unsound to delist the grizzly bear.	FWS-R6-ES-2016-0042-1827	
Grizzly numbers are still at a level of uncertainty and are susceptible to many variables from year to year. The fact that nearly 60 bears were killed alone in 2015 while still protected exemplifies this instability. (known deaths)	103			Data doubts and comments on process	To Fish and Wildlife Services and others concerned with this issue, I am writing to oppose Grizzly delisting and hope that the bigger picture of scientific evidence will be considered. This consideration is premature on many scientific levels. We have not fully gained the knowledge and evidence that the declining amount of white bark pine, cutthroat trout and other food sources for grizzly bears will not affect their long-term survival and numbers. Additionally, it can not be underestimated that the effects of climate change will continue to poorly affect the numbers and longevity of grizzly bears in the lower 48. Grizzly numbers are still at a level of uncertainty and are susceptible to many variables from year to year. The fact that nearly 60 bears were killed alone in 2015 while still protected exemplifies this instability. (known deaths) I am greatly disturbed by the recent decision of the FWS to very belatedly notify the public of the killing of a grizzly bear that occurred in November 2015. This is atrocious. The public deserves answers, facts and timely information rather than politics. Decisions like this do not provide for public trust and faith in the various agencies or states to protect grizzlies if delisted. Additionally, It is worrisome and inappropriate that the loss of habitat for grizzlies due to human encroachment is not being considered part of the factor in maintaining quality numbers of grizzlies over the long term. Human-bear conflict most often results in the dispatching of the bear...to delist the grizzly ignores the fact that grizzly bears need large amounts of habitat to exist and thrive. Their protection under the ESA allows for better management and public restraint and education when human-bear ranges overlap. These are just a few of the reasons against de-listing. Scientifically, ethically, and environmentally it is premature and unsound to delist the grizzly bear.	FWS-R6-ES-2016-0042-1827	

Grizzlies are notoriously hard to count, and some independent scientists have challenged the studies on which the government has based its population assessments not only of present numbers but of projected ones. Their analyses indicate that the population is already declining.	102			Data doubts and comments on process	I am the author of THE GRIZZLY BEAR, first published by Alfred A. Knopf in 1984 and republished several times, most recently in 1997 by Lyons and Burford. It was called "a classic" by the New York Times and is still considered the definitive book on the Yellowstone grizzly bear population. I am also a former chairman of the Greater Yellowstone Coalition as well as a former partner in a cattle ranch within the Greater Yellowstone Ecosystem which is seasonally occupied grizzly bear habitat. The proposed end of federal protection of the Yellowstone grizzly bear is trumpeted in some quarters as one of the great triumphs of the Endangered Species Act. In fact it would be a spurious victory. The most salient argument against delisting is the collapse of the grizzlies' food system. By far the most important source of nutrition for the bears has been the seeds of the whitebark pine tree, but the whitebark is under a double attack. The native mountain pine beetle has historically been kept in check by periodic deep freezes, but there haven't been any of those for years now. The other attacker is the deadly, non-native white pine blister rust. More than 95 percent of the whitebarks are now dead. Until recent years, early each summer there were vast runs of spawning cutthroat trout up the tributaries of Yellowstone Lake a high-fat feast for grizzlies. Since the illegal introduction of non-native lake trout, however, which feed on juvenile cutthroats, the spawning runs are down by 90 percent. A less well understood but equally grave danger is that Yellowstone grizzlies live on what is effectively an island. Island populations are subject to inbreeding and hence lowered reproduction rates and grizzlies are already among the least fecund mammals, rarely producing young until the age of five, with litters of two cubs most common, typically three years apart. When island populations dip, they cannot be resupplied by adjacent populations, because there aren't any. The study of island biogeography has found that islands always have higher rates of extinction. Grizzlies are notoriously hard to count, and some independent scientists have challenged the studies on which the government has based its population assessments not only of present numbers but of projected ones. Their analyses indicate that the population is already declining. The increasingly far-right legislatures of Idaho, Montana, and Wyoming are thirsty for the bear management control that would come to their fish and game departments with delisting the Yellowstone grizzly. The bears would be hunted. Their numbers and the extent of their range would inevitably be reduced. Opponents of delisting cite what happened when Yellowstone's gray wolves came under state management. Montana has been pretty good, but conservationists claim that Idaho's approach, at least in some parts of the wolves' range, has been not far short of outright slaughter, and Wyoming decreed that outside a zone encircling Yellowstone and its adjacent protected lands, the rest of the state would be a year-round free-fire zone. Please don't delist grizzly bears. Part 2: FWS claim: Montana, Idaho, and Wyoming will successfully use hunting to manage the recovered grizzly bear population. The reality: The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. FWS claim: Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. The reality: This approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS claim: The agency says it looks forward to hearing from the public about delisting. The reality: A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. FWS claim: The agency claims to look forward to consulting with Native American tribes about the delisting. The reality: Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and fish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the	FWS-R6-ES-2016-0042-1832	
WS claim : The agency says it looks forward to hearing from the public about delisting. The reality : A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. FWS claim: The agency claims to look forward to consulting with Native American tribes about the delisting. The reality : Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and fish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the	100	103	105	Data doubts and comments on process	Please don't delist grizzly bears. Part 2: FWS claim: Montana, Idaho, and Wyoming will successfully use hunting to manage the recovered grizzly bear population. The reality: The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. FWS claim: Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. The reality: This approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS claim: The agency says it looks forward to hearing from the public about delisting. The reality: A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. FWS claim: The agency claims to look forward to consulting with Native American tribes about the delisting. The reality: Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and fish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the	FWS-R6-ES-2016-0042-1841	

The populations of Grizzlies in this area is not actually known and while a guess can be made that populations have tripled it may be an exaggeration. More studies are required. If Grizzlies are delisted their numbers will drop and it will only be a matter of time that FWS will have to re-list them.	103			Data doubts and comments on process	I am strongly opposed to the proposal to remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I am completely surprised and disappointed that this is even being proposed. Grizzly Bears are such an important part of the greater ecosystem and keep the Yellowstone region wild. They are one of the main reasons visitors come to the Yellowstone area and it would be unjust to let them be shot once they step outside the park boundaries. The populations of Grizzlies in this area is not actually known and while a guess can be made that populations have tripled it may be an exaggeration. More studies are required. If Grizzlies are delisted their numbers will drop and it will only be a matter of time that FWS will have to re-list them. In addition trophy hunting is an abhorrent sport that no longer has a place in today's society. The majority of the population does not support trophy hunting. Please do not delist the Grizzly!!	FWS-R6-ES-2016-0042-1866	
The USFWS claims there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration."	103	102		Data doubts and comments on process	I OPPOSE DELISTING!! Here is why and the science behind it: THE USFWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. The USFWS claims there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." More science to come.	FWS-R6-ES-2016-0042-1878	
There is absolutely no consensus on the size of the grizzly bear population in Yellowstone. There are some estimates, and all of those estimates are beset by bias of one sort or another. On the one hand you'll hear them claiming there's a thousand bears, based on use of one method. On the other hand they'll say there's 700 bears, based on the use of a different estimator altogether. The carrying capacity is not static, it's not a constant. It varies hugely, and I would argue that because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millennial drought which is promising more of the same to come, that we've seen a decline in carrying capacity. And so it's probably no surprise that the bear population is bumping its head up against carrying capacity. In fact, what we've had is a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods making them look outside of Yellowstone.	102	103		Data doubts and comments on process	Delisting of the Greater Yellowstone Grizzly Bear is just a political ploy to appease the state governments of Wyoming, Montana, and the "Trophy Hunting" community. A live Grizzly Bear is worth far economically to these states and communities adjacent to Yellowstone Park than the revenue from a hunting license and a Grizzly Bear rug hanging on some hunters wall. There is absolutely no consensus on the size of the grizzly bear population in Yellowstone. There are some estimates, and all of those estimates are beset by bias of one sort or another. On the one hand you'll hear them claiming there's a thousand bears, based on use of one method. On the other hand they'll say there's 700 bears, based on the use of a different estimator altogether. The carrying capacity is not static, it's not a constant. It varies hugely, and I would argue that because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millennial drought which is promising more of the same to come, that we've seen a decline in carrying capacity. And so it's probably no surprise that the bear population is bumping its head up against carrying capacity. In fact, what we've had is a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods making them look outside of Yellowstone. The turning over of Grizzly Bear management to the states surrounding is a gross mistake. Look how they managed Grey Wolves it is nothing but an attack to eliminate them. I think it is important to keep them listed up until we have had a chance to reform state wildlife management, because state management is such a poor alternative. It's a really poor alternative at a time when the population is becoming increasingly vulnerable. I am would be willing to predict is that if you wait two years out into the future using the exact same methods you're using now, the population estimate will be down to 600, at which point, even by your reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using your methods. Under a scenario like that, with the drivers afoot leading to elevated grizzly bear mortality as-is, I don't think we can afford to have any increase in mortality for any reason at all. There is another key reason that is being completely overlooked. None of your documents even acknowledge the spiritual importance to the Native American the significance of the Grizzly Bear to their culture. Doing so continues to keep Native Americans second class citizens in this country where all men are created equal	FWS-R6-ES-2016-0042-2000	

Sport hunting of the Yellowstone Grizzly Bear cannot be justified due to increase risks that are not addressed and increasing mortality of these bears.	103			Data doubts and comments on process	While I was the BLM Dillon Field Manager, I served as the Montana BLM representative to the IGBC Yellowstone Ecosystem Subcommittee for ten years (2002-2012). Great strides have been made in increasing the Yellowstone sub population of Grizzly Bears, however more work is needed to reduce threats to this population of Grizzly Bears. Reduced high value food supplies due to the loss of Yellowstone Cutthroat Trout, Whitebark Pine Nuts, and the significant reduction in the Yellowstone Northern Elk Herd have decreased the upward trajectory of this population of Grizzly Bears. In fact the population increase has been static for the last ten years while human caused threats identified have not been addressed. This has resulted in increased mortality that cannot sustain the population long term. Increased human population, especially to the north and east of Yellowstone National Park has resulted in increased hunting pressure on Elk resulting in Grizzly Bear deaths due to conflicts with Grizzly Bears during hunting season. Continued domestic sheep grazing on USDA public lands in the Centennial and Gravelly Mountains of Southwest Montana have resulted in Grizzly Bear deaths and are prohibiting the genetic connection between the Northern Continental Divide and Yellowstone Ecosystems. Sport hunting of the Yellowstone Grizzly Bear cannot be justified due to increase risks that are not addressed and increasing mortality of these bears. Funding to address these increasing risks are not available to either the three states nor to the federal land management agencies where these bears reside. Nor is it likely that funding will be made available to the states or federal land management agencies in the future to address these increasing risks. States don't even require hunters to carry bear spray while hunting big game in hunting units occupied by grizzly bears. Until there is a substantial increase in the efforts to reduce risks to the Yellowstone Grizzly Bear I don't believe the Yellowstone Grizzly should be delisted.	FWS-R6-ES-2016-0042-1958	
Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Plus, the GYE is an isolated "island" where species diversity is limited because corridor for new genetic are shut down because of human inter mention (i.e. road, ranches, etc.) GYE x region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. x FWS x will stay involved with protecting the grizzly population after delisting. x	103	102	101	Data doubts and comments on process	Thank you for allowing public comment on this Proposed issue: The shortage of cutthroat trout and whitebark pine nut two of the grizzly's primary foods is not a threat to the grizzly's long term survival. Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Plus, the GYE is an isolated "island" where species diversity is limited because corridor for new genetic are shut down because of human inter mention (i.e. road, ranches, etc.) GYE region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. FWS will stay involved with protecting the grizzly population after delisting. In the form of a leaked memo, the 3 states said that they will open up trophy hunting seasons for the bears. I believe that opening such seasons is a prime motivation for the states in pushing for de-listing. If you look at what each state is doing to manage wolves, it is clear that they will only allow the minimum numbers of individuals to survive, nothing more. Relying on state agencies, that have shown a deep hatred towards any predator shall NOT be allowed or given a chance to manage an endangered species. FWS claim that they will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future " the grizzly population will be down to 600 at which point even by	FWS-R6-ES-2016-0042-1922	
The delisting of the Yellowstone grizzlies would be a devastating mistake for many reasons. To preserve and enhance this isolated gene pool good science should provide guidance to implement a plan to provide interaction with other bear populations. This would also allow for a greater range for food forage. Grizzlies have a slow rate of reproduction and any females lost would tip the scales unfavorably. A certain element in some Western States is all too eager to decimate their bear and wolf populations. This hostility displaces scientific studies and any respect for their wildlife and the will of the people throughout the United States.	102			Data doubts and comments on process	The delisting of the Yellowstone grizzlies would be a devastating mistake for many reasons. To preserve and enhance this isolated gene pool good science should provide guidance to implement a plan to provide interaction with other bear populations. This would also allow for a greater range for food forage. Grizzlies have a slow rate of reproduction and any females lost would tip the scales unfavorably. A certain element in some Western States is all too eager to decimate their bear and wolf populations. This hostility displaces scientific studies and any respect for their wildlife and the will of the people throughout the United States.	FWS-R6-ES-2016-0042-1926	

I am would be willing to predict is that if you wait two years out into the future using the exact same methods you're using now, the population estimate will be down to 600, at which point, even by your reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using your methods. Under a scenario like that, with the drivers afoot leading to elevated grizzly bear mortality as-is, I don't think we can afford to have any increase in mortality for any reason at all.	102	103		Data doubts and comments on process	Delisting of the Greater Yellowstone Grizzly Bear is just a political ploy to appease the state governments of Wyoming, Montana, and the "Trophy Hunting" community. A live Grizzly Bear is worth far economically to these states and communities adjacent to Yellowstone Park than the revenue from a hunting license and a Grizzly Bear rug hanging on some hunters wall. There is absolutely no consensus on the size of the grizzly bear population in Yellowstone. There are some estimates, and all of those estimates are beset by bias of one sort or another. On the one hand you'll hear them claiming there's a thousand bears, based on use of one method. On the other hand they'll say there's 700 bears, based on the use of a different estimator altogether. The carrying capacity is not static, it's not a constant. It varies hugely, and I would argue that because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millenial drought which is promising more of the same to come, that we've seen a decline in carrying capacity. And so it's probably no surprise that the bear population is bumping its head up against carrying capacity. In fact, what we've had is a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods making them look outside of Yellowstone. The turning over of Grizzly Bear management to the states surrounding is a gross mistake. Look how they managed Grey Wolves it is nothing but an attack to eliminate them. I think it is important to keep them listed up until we have had a chance to reform state wildlife management, because state management is such a poor alternative. It's a really poor alternative at a time when the population is becoming increasingly vulnerable. I am would be willing to predict is that if you wait two years out into the future using the exact same methods you're using now, the population estimate will be down to 600, at which point, even by your reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using your methods. Under a scenario like that, with the drivers afoot leading to elevated grizzly bear mortality as-is, I don't think we can afford to have any increase in mortality for any reason at all. There is another key reason that is being completely overlooked. None of your documents even acknowledge the spiritual importance to the Native American the significance of the Grizzly Bear to their culture. Doing so continues to keep Native Americans second class citizens in this country where all men are created equal	FWS-R6-ES-2016-0042-2000	
I am sure that you can come up with a solution for the people vs bear situation.	100			Data doubts and comments on process	Please do not remove the grizzly bears from the endangered list. I would take one minute for them to become endangered again. I am sure that you can come up with a solution for the people vs bear situation. Trophy hunters to not count. Please find a refuge for them.	FWS-R6-ES-2016-0042-2068	
I oppose the de-listing of the Grizzly Bear (Greater Yellowstone area) on the grounds that the decision is not based on scientific research or empirical evidence. It appears that the USFWS is influenced more by commercial guiding and hunting interests, than the will of the greater population of voters in the USA. The ones that pay taxes and hire the USFWS to protect the public lands and wildlife species. The scientific data prove that the grizzly bear does not do well (low population numbers, and declining) in the lower 48 states outside of the Greater Yellowstone region. This evidence supports keeping a protected population in the lower 48 states, as we have in this Greater Yellowstone region.	102			Data doubts and comments on process	I oppose the de-listing of the Grizzly Bear (Greater Yellowstone area) on the grounds that the decision is not based on scientific research or empirical evidence. It appears that the USFWS is influenced more by commercial guiding and hunting interests, than the will of the greater population of voters in the USA. The ones that pay taxes and hire the USFWS to protect the public lands and wildlife species. The scientific data prove that the grizzly bear does not do well (low population numbers, and declining) in the lower 48 states outside of the Greater Yellowstone region. This evidence supports keeping a protected population in the lower 48 states, as we have in this Greater Yellowstone region.	FWS-R6-ES-2016-0042-2111	

There isn't an accurate count of the Grizzly Bear population and by delisting the Grizzly Bear, we are opening it up for the bears to be hunted as trophies. While the government can say that safeguards will be put in place to protect the Grizzly Bear to the extent that they can be protected once they are delisted, I doubt that there is adequate manpower in the governmental agencies, to make sure the rules/laws/quotas are followed by hunters. Scarface's death by a hunter is evidence of that. We have brought back the Grizzly Bear population to an almost viable level, why would we undo all the work that has been accomplished, while they have been under protection, by taking them off the endangered species list? They face enough challenges w/changing eco-systems, lack of food, etc. without having to deal with trophy hunters, too. Relinquishing federal protection now and handing management over to the various states involved would be a huge error in judgment.	103	102		Data doubts and comments on process	I am against The Fish and Wildlife Service removing the Greater Yellowstone Grizzly Bear from the endangered species list. There isn't an accurate count of the Grizzly Bear population and by delisting the Grizzly Bear, we are opening it up for the bears to be hunted as trophies. While the government can say that safeguards will be put in place to protect the Grizzly Bear to the extent that they can be protected once they are delisted, I doubt that there is adequate manpower in the governmental agencies, to make sure the rules/laws/quotas are followed by hunters. Scarface's death by a hunter is evidence of that. We have brought back the Grizzly Bear population to an almost viable level, why would we undo all the work that has been accomplished, while they have been under protection, by taking them off the endangered species list? They face enough challenges w/changing eco-systems, lack of food, etc. without having to deal with trophy hunters, too. Relinquishing federal protection now and handing management over to the various states involved would be a huge error in judgment.	FWS-R6-ES-2016-0042-2261	
Further studies are needed to insure that this majestic animal is no longer in danger of extinction. With such a limited gene pool, lower numbers of bears can only in the long term hurt them and their chances not only for survival but to thrive as well.	103			Data doubts and comments on process	It is my wish that the proposal to remove the grizzly bear from the endangered species list be denied. Further studies are needed to insure that this majestic animal is no longer in danger of extinction. With such a limited gene pool, lower numbers of bears can only in the long term hurt them and their chances not only for survival but to thrive as well. Since the hunting of these animals can only be considered a trophy hunt and not a true food source, there is no need to rush to remove them from the endangered list. No human will go hungry if they are not allowed to hunt grizzly bears. Please wait for the bear population to not only increase but to thrive before considering the removal of them from the endangered species list! Thank you,	FWS-R6-ES-2016-0042-2318	
Given the demonstrable and growing adverse effects of global warming on food sources bears rely upon, there is no justification for concluding that grizzly numbers have recovered sufficiently to remove this ecosystem's population from the protections of the ESA.	103			Data doubts and comments on process	Delisting Yellowstone Grizzlies in 2016 is an ill-advised and premature proposal. There has not been enough preparation to secure adequate habitat protection for them, and I am appalled that FWS continually caves in to pressure from ranching interests and adjacent State governments to facilitate hunting and culling of wildlife populations. Given the demonstrable and growing adverse effects of global warming on food sources bears rely upon, there is no justification for concluding that grizzly numbers have recovered sufficiently to remove this ecosystem's population from the protections of the ESA. Grizzlies in the lower forty-eight states have a special significance for millions of American citizens. Their continued existence (along with wolves and cougars) as the apex predators of the increasingly constricted natural wildlife areas is extraordinarily important to most of us. Given the fact that FWS has already screwed up the reintroduction of buffalo and wolves to the Yellowstone ecosystem, this proposed delisting should be postponed for at least another five years.	FWS-R6-ES-2016-0042-2400	
Please send me a hard copy (a paper copy) of your Environmental Impact Statement relating to the de-listing of the grizzly bear in the Greater Yellowstone Ecosystem, all other analysis documents, any other related documents, and any other notices and decisions relating to the grizzly bear in the Greater Yellowstone Ecosystem.	100			Data doubts and comments on process	See Attached Attachments Dahberg Joan	FWS-R6-ES-2016-0042-2458	Jennifer-please address NEPA process in comment responses
what's the rush to delist the bear, especially now, where we might be at critical tipping point with climate change? Sixty days is certainly not enough to adequately review the delisting rule, the Final Revised Recovery Plan Supplement, and the Revised Conservation Strategy.	100			Data doubts and comments on process	See Attached Attachments Carson Millie	FWS-R6-ES-2016-0042-2459	

US Fish and Wildlife data regarding the GYE grizzly population is suspect at best. For years, most counts of the population were in the 200 to 400 range. When de-listing was first proposed in 2007, the number suddenly shot up to 700. The methods used to arrive at that number involve a great deal of extrapolation from an extremely small sample of verified sightings. Rather than relying on US FWS data (pressured by lobbyists and hostile legislators), the public should demand research by independent organizations like The Ecological Society of America or the National Research Council. Current population estimates are untrustworthy, and the field needs good peer-reviewed analysis by objective scientists . Å	102	103		Data doubts and comments on process	De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, seasonable resilience, and availability throughout the habitat. The Greater Yellowstone Ecosystem (GYE) population is much smaller than the Northern Range bears, but the Northern population is not being considered for de-listing. The GYE population is being threatened because industrial, energy, and development companies have been applying tremendous political pressure through lobbying and heavy-handed public relations campaigns (promising jobs, dismissing science; the usual stuff). The GYE grizzlies are an "island population". This means that they are adapted to live and thrive within a specific geographic range. Substantial threats or changes to that habitat would likely pressure the bears to try and relocate, but they cannot successfully do so. The Greater Yellowstone Ecosystem is the environment to which they have adapted over eons. There is not another environment to which they could relocate and remain a viable species. Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability. US Fish and Wildlife data regarding the GYE grizzly population is suspect at best. For years, most counts of the population were in the 200 to 400 range. When de-listing was first proposed in 2007, the number suddenly shot up to 700. The methods used to arrive at that number involve a great deal of extrapolation from an extremely small sample of verified sightings. Rather than relying on US FWS data (pressured by lobbyists and hostile legislators), the public should demand research by independent organizations like The Ecological Society of America or the National Research Council. Current population estimates are untrustworthy, and the field needs good peer-reviewed analysis by objective scientists. If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it.	FWS-R6-ES-2016-0042-2542	
Courts have ruled that the U.S. Fish and Wildlife Service must consider the overall recovery of the species as it was originally listed under the Endangered Species Act, and may not delist isolated segments of the species (such as the Greater Yellowstone grizzly population) one at a time.Fact: This is a stalling tactic. Not all courts agree on any issue, especially since judge-shopping has become a common legal tactic, especially by activists. And, of course, not all areas see population recovery at the same rate.	104	103		Data doubts and comments on process	I agree with the delisting of the Grizzly Bear and opening a hunting season on them. Please Reference: According to Yellowstone National Park, over the last 40 years the grizzly population there has grown from 136 to a stable population of somewhere between 674 and 839 The recovery population goal was 500 and was actually met in 1999. The grizzly bears in the Yellowstone area had been removed from the list in 2007 but in 2009 a 9th Circuit federal judge ordered that they be put back on, citing the decline of the whitebark pine tree, whose pine cone nuts were seen as a critical part of the grizzly diet. However, the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered.. Predictably, the Sierra Club and some other groups are opposing the delisting. Here are the objections listed by the Sierra Club in an August 2015 article. The growth rate of the Greater Yellowstone grizzly bear population has been flat since the early 2000s, and may be in decline. Fewer cubs and yearlings are surviving to adulthood. Fact: Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said the reason the population is leveling out is that bear density has reached the carrying capacity for the range. Fact: the number of female grizzlies with cubs in the Yellowstone ecosystem was the highest ever recorded ever counted in 2013. Grizzly bears in the Yellowstone region are completely isolated from other grizzly bear populations, both geographically and demographically, as they have been for 100 years. Fact: Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000 - also likely to be proposed for delisting), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. Existing state management plans will not protect Yellowstone grizzly bears and will not allow them to connect to other grizzly populations if they are delisted now. Wyoming, Montana, and Idaho, the three states where Yellowstone grizzly bears live, plan to immediately initiate sport hunting of grizzly bears as soon as they are delisted. Fact: Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600. Courts have ruled that the U.S. Fish and Wildlife Service must consider the overall recovery of the species as it was originally listed under the Endangered Species Act, and may not delist isolated	FWS-R6-ES-2016-0042-2520	

The US Fish & Wildlife Service cannot reliably assess the status of the Yellowstone population. Grizzly bears in Yellowstone's mountainous and forested wilderness are notoriously hard to count, whether live or dead. This means that the US Fish & Wildlife Service (USFWS) has resorted to using indirect indicators together with statistical adjustments to track the population. Recent research has shown that the methods used by the USFWS are not only unreliable, but also generate spurious results that increase the likelihood that the USFWS will erroneously conclude that the population has grown, when in fact, it has declined due to excessive numbers of deaths. Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. A bad situation will almost certainly worsen if Yellowstone's grizzlies are delisted and resources are not available to maintain current levels of monitoring. Attachments Dr. Mark Bekoff	102	103		Data doubts and comments on process	I OPPOSE the delisting of the Grizzly Bears. "Why rush with a decision to delist, when all indicators are of a population that is vulnerable and positioned to decline even more than they already have?" - Dr. David Mattson Dr. Jane Goodall opposes delisting also. Yellowstone's grizzly bears have lost critically important foods. Since the early to mid-2000s, two of the four key grizzly bear foods, cutthroat trout and the seeds of whitebark pine, have collapsed. Drought, climate warming and predation by a nonnative trout have nearly extirpated cutthroat trout in Yellowstone Lake. Whitebark pine have been functionally wiped out by the spread of a non-native fungal disease and by a highly lethal and unprecedented climate-driven outbreak of bark beetles. Most elk populations have also declined some dramatically-- from highs reached during the 1990s and early 2000s. There is no doubt that food resources of Yellowstone's grizzly bears have declined and put the population at grave risk, with a prognosis of more of the same to come. State-level management of large carnivores is a problem. State wildlife management agencies in the West are locked down in an Iron Triangle that serves the minority special interests of those who want to kill deer, elk, moose, and bighorn sheep (i.e., ungulates). State agencies view large carnivores primarily as competitors for ungulates that could otherwise be on the market for sport hunting licenses, which are a major source of agency revenue. Sport hunting has been used during recent decades to drive down populations of mountain lions and wolves, and, accounts for roughly 70-80% of all deaths of adult carnivores in the region. Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals. Grizzly bears are vulnerable to the excesses of state-level wildlife management. Grizzly bears have one of the lowest reproductive rates of any terrestrial mammal. A typical female will only produce 2 cubs once every 3 years, with good odds that one of the cubs will die before it reaches adulthood. Grizzly bears also have difficulty colonizing new habitats, primarily because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates, and readily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. The US Fish & Wildlife Service cannot reliably assess the status of the Yellowstone population. Grizzly bears in Yellowstone's mountainous and forested wilderness are notoriously hard to count, whether live or dead. This means that the USFWS has resorted to using indirect indicators together with statistical adjustments to track the population. Recent research has shown that the methods used by the USFWS are not only unreliable, but also generate spurious results that increase the likelihood that the USFWS will erroneously conclude that the population has grown, when in fact, it has declined due to excessive numbers of deaths. Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. A bad situation will almost certainly worsen if Yellowstone's grizzlies are delisted and resources are not available to maintain current levels of monitoring.	FWS-R6-ES-2016-0042-2615	
I oppose removal of protection of the Greater Yellowstone Ecosystem ("GYE") population of grizzly bears under the Endangered Species Act ("ESA"), as amended, 16 U.S.C. §§ 1531-1544, as proposed by the U. S. Fish & Wildlife Service ("FWS"), in the Federal Register on March 11, 2016, 81 Fed. Reg. 13174 et seq. (the "2016 PDR"), for the reasons set forth below. I- The Rule of Law in the United States means that it and its citizens submit to a set of laws to govern behavior and to an independent judiciary to administer and enforce those laws., As Theodore Roosevelt said in 1903, "Ours is a government of liberty by, through and under law. No man is above it, and no man is below it." The Rule of Law protects the public from government abuse of power. U. S. Supreme Court Justice Felix Frankfurter wrote in a concurring opinion in United States v. United Mine Workers, 330 U.S. 258, 307-09, 312 (1947): The historic phrase "a government of laws and not of men" epitomized the distinguishing character of our political society. When John Adams put that phrase into the Massachusetts Declaration of Rights, pt. 1, art. 30, he was not indulging in a rhetorical flourish. He was expressing the aim of those who, with including about 90% from Idaho, Montana and Wyoming, opposed delisting. 6 FWS disregarded that overwhelming sentiment and issued the 2007 FDR, which was invalidated in litigation as described above. The FWS justified its disregard on the ground that the public comments were not a "vote count" (AR 466831 or a	100	102	103	Data doubts and comments on process	I oppose removal of protection of the Greater Yellowstone Ecosystem ("GYE") population of grizzly bears under the Endangered Species Act ("ESA"), as amended, 16 U.S.C. §§ 1531-1544, as proposed by the U. S. Fish & Wildlife Service ("FWS"), in the Federal Register on March 11, 2016, 81 Fed. Reg. 13174 et seq. (the "2016 PDR"), for the reasons set forth below. I- The Rule of Law in the United States means that it and its citizens submit to a set of laws to govern behavior and to an independent judiciary to administer and enforce those laws., As Theodore Roosevelt said in 1903, "Ours is a government of liberty by, through and under law. No man is above it, and no man is below it." The Rule of Law protects the public from government abuse of power. U. S. Supreme Court Justice Felix Frankfurter wrote in a concurring opinion in United States v. United Mine Workers, 330 U.S. 258, 307-09, 312 (1947): The historic phrase "a government of laws and not of men" epitomized the distinguishing character of our political society. When John Adams put that phrase into the Massachusetts Declaration of Rights, pt. 1, art. 30, he was not indulging in a rhetorical flourish. He was expressing the aim of those who, with including about 90% from Idaho, Montana and Wyoming, opposed delisting. 6 FWS disregarded that overwhelming sentiment and issued the 2007 FDR, which was invalidated in litigation as described above. The FWS justified its disregard on the ground that the public comments were not a "vote count" (AR 466831 or a		

But what strikes me is that there are so few grizzlies in the lower 48 no matter what estimation, extrapolation is used. Are the grizzlies truly recovered enough to delist? Are some of the numbers of grizzlies located in genetically isolated areas that can not contribute to the ongoing survival of the species? What about the effects of our warming climate and the effect it has on the grizzlies food sources? I know that some scientists say that the lack of the White Bark Pine Nut has had a minimal impact because grizzlies are opportunistic and have adapted. Have they? Are we certain? Do we have enough data over a long enough period to KNOW this.	103	102		Data doubts and comments on process	Delisting grizzlies in the GYE is a mistake. I have been visiting Yellowstone for over 15 years. I make the long trek from Southern California to Yellowstone every year; sometimes twice a year for one main reason. To hike the backcountry with the great bear. I am not a scientist. I have no "Hard Numbers" of data to offer to my argument. Just my experience as a hiker and overnight backpacker through the Pelican Valley, Mist Trail, Lamar Trail, Rim Trail, on and on. I can tell you this, seeing a grizzly in the backcountry is a life changing event. It puts humility back in humanity. It lets us know that (without high powered rifles) we are not the alpha predator. We have our brain and our opposable thumbs. Our Brain goes on "Hi Alert" when in grizzly country. Our opposable thumbs lift our backpacks at night to keep the bruins from raiding our campsites. We hold bear spray with the situation arises. But in the moment, our daily problems disappear as our goal is to enjoy nature on NATURES TERMS. And, to me, the grizzly bear is the epitome of nature; of "The Wild." This is an animal that can kill a human at anytime if it choose to do so. It rarely; I mean RARELY does. And when it does, it is usually because we have made a mistake. We have not respected the great bear and the results can be deadly. Of course, even the most stupid human mistakes in bear country rarely result in injury, let alone death. I think it is clear that the jury is out on the status of the grizzly bear and its recovery status in the GYE. Scientists, groups on both sides (including the powerful attorneys) are set to battle no matter which decision is made. But what strikes me is that there are so few grizzlies in the lower 48 no matter what estimation, extrapolation is used. Are the grizzlies truly recovered enough to delist? Are some of the numbers of grizzlies located in genetically isolated areas that can not contribute to the ongoing survival of the species? What about the effects of our warming climate and the effect it has on the grizzlies food sources? I know that some scientists say that the lack of the White Bark Pine Nut has had a minimal impact because grizzlies are opportunistic and have adapted. Have they? Are we certain? Do we have enough data over a long enough period to KNOW this. Sadly, it is apparent to me that we as a society are willing to risk the loss of the great bear from the GYE. This is not about human safety as humans are (and should be allowed) to kill aggressive / problem bears. I have no problem with that (when it is properly investigated and legal action taken when the circumstances did not justify killing the grizzly). Montana, Wyoming and Idaho have a "Dog in the fight" because they are anxious to get the fees for grizzly tags. I'm all for states rights. But in this case, the grizzly bear simply is still at risk of extinction. There are too many "unknowns" in the calculations / extrapolations. The fact is, the only way to know the true health of the grizzly population is to have an accurate count of sows with cubs of the year. 750 grizzlies (the upper estimate) means nothing if the majority	FWS-R6-ES-2016-0042-2640	
Many people (most of whom probably don't even live near the GYE) are concerned that if de-listing is allowed to occur, that somehow State game agencies won't be able to manage the grizzly populations. This is not a valid fear. When has regulated hunting EVER reduced a population of animals to extinction...or even threatened status? Unregulated hunting, yes...regulating hunting, no! If anything, those that may be lucky enough to obtain one of the few permits that would be given out likely have high respect and regard for the grizzly. We prize and value those things in life that we are connected to. There is no greater connection to nature than to experience it first hand in a conservation NOT preservation-guided system.	100	304		Data doubts and comments on process	When will science prevail in this debate on whether or not to de-list the grizzly? The recovery goal was set at 500. The current population averaged between 2002-2014 is at 674! Sounds like they are recovered to me if we look strictly at numbers. Grizzlies also occupy 84% of suitable habitat in the GYE, and are expected to soon occupy the remainder. Sounds recovered to me! The number of female grizzlies with cubs was the highest ever recorded in the GYE in 2013. Once again, given the preceding information, they sound recovered to me! Again, when will we listen to those that have been given responsibility to recover this species and NOT the special interest groups that use the grizzly, the wolf, and now to a lesser (but increasing) extent, the sage grouse, to do their fundraising for them? It's not right, and should not be allowed to happen. Many people (most of whom probably don't even live near the GYE) are concerned that if de-listing is allowed to occur, that somehow State game agencies won't be able to manage the grizzly populations. This is not a valid fear. When has regulated hunting EVER reduced a population of animals to extinction...or even threatened status? Unregulated hunting, yes...regulating hunting, no! If anything, those that may be lucky enough to obtain one of the few permits that would be given out likely have high respect and regard for the grizzly. We prize and value those things in life that we are connected to. There is no greater connection to nature than to experience it first hand in a conservation NOT preservation-guided system. Please follow the science and de-list the grizzly bear. The GYE DPS is recovered beyond the original goals that were deemed sufficient to allow de-listing. What is the hold up??	FWS-R6-ES-2016-0042-2792	
I'm not at all convinced that the regulatory mechanisms that have been in place will be sufficient to protect grizzlies after they are delisted, and none of the schemes or suggestions I've heard presented show very much promise. bears particularly are notoriously difficult to audit. I challenge the USFWS to present their arguments that either their plans for enforcement will protect bears sufficiently to return them to the brink of extinction.	102	103		Data doubts and comments on process	I'm not at all convinced that the regulatory mechanisms that have been in place will be sufficient to protect grizzlies after they are delisted, and none of the schemes or suggestions I've heard presented show very much promise. bears particularly are notoriously difficult to audit. I challenge the USFWS to present their arguments that either their plans for enforcement will protect bears sufficiently to return them to the brink of extinction.	FWS-R6-ES-2016-0042-2838	

A 3 year study by USFWS, led by Chris Servheen, a known trophy hunter, affiliated with Safari Club International, is a biased and non-scientifically validated opinion, motivated by desire to hunt the bears. Never seen by the public, nor PEER reviewed by a panel of independent experts in the field, it is outrageously arrogant and shortsighted to accept any non-validated and transparent study. Amounting to nothing less that the Fox guarding the Hen House, this supposed study, would never make it to any Scientifically Valid Journals and probably the reason it's been hidden from anybody's view and evaluation.	102			Data doubts and comments on process	Since Grizzly Bears took years of Endangered Species protections to come back from the brink of extinction in the lower 48 states, to where we might be able to see one once again in Yellowstone, it seems far too soon to delist at this time. There are more issues than a population count can address, such as the ever changing environmental factors, coupled with bears very slow reproductive rate(2nd slowest breeding animal in the continent) and fragility of health contributing to reproduction uncertainties. Occupation of less than 2% of historic habitat, with pockets of protections from trapping and hunting, will lead to isolated populations. It's well known that, one can only continue to breed relatives, of any species, for so long before genetic problems begin to arise and threaten any sustainable population. Currently we have a prime example of this problem displayed in the Isle Royale Wolves of Michigan. Isolated on an island and without any genetic biodiversity, they display genetic mutations and are dying out, at last report, there were two left. To not allow safe travel from one preserve to another, will effectively reduce the Greater Yellowstone Ecosystem population of Grizzly Bears to such a perilous position. It's already public knowledge that Wyoming, Montana and Idaho planed all along to sell hunting tags to the less than 4% of the population that trophy hunts, as soon as delisting occurs. It was the lack of care from Wyoming's Game & Fish, that led to the listing in the first place, since they couldn't manage to stop the hunting even when the population was crashing. Why would we expect them to do any different now? We have seen how they have been unable to develop a viable Wolf Management plan, which recently led to the return of the ESA status in the state, but only after a lawsuit was initiated by conservationists had been filed and heard in the courts. Both Grand Teton and Yellowstone National Park Superintendents have publicly stated they oppose the delisting of the Grizzly Bear and they based their position upon the best available science from the experts in the field of Grizzly Bear knowledge and physical area in question, the biologists of the Parks, the best bear experts in the world. We are certain that climate changes are occurring and that science is evolving daily. We know that currently we live in what is called, The 6th Major Extinction on Earth, loosing more species in the last few years, than any there space in time since the dinosaurs died. We have also seen the Public Outrage over the trophy hunting of lions in Africa. The Yellowstone/Teton Grizzlies are just as famous, if not more so than Cecil the Lion. Ethically and morally it is wrong to kill any animal for a trophy. A 3 year study by USFWS, led by Chris Servheen, a known trophy hunter, affiliated with Safari Club International, is a biased and non-scientifically validated opinion, motivated by desire to hunt the bears. Never seen by the public, nor PEER reviewed by a panel of independent experts in the field, it is outrageously arrogant and shortsighted to accept any non-validated and transparent study. Amounting to	FWS-R6-ES-2016-0042-2819	
The population has not yet proven it is sustained at higher levels to change policy. Fish and Wildlife should continue to study and wait.	102	103		Data doubts and comments on process	The population has not yet proven it is sustained at higher levels to change policy. Fish and Wildlife should continue to study and wait.	FWS-R6-ES-2016-0042-2907	
The criteria that the agency have been using to make that recommendation are too narrow, so that the predicament of those bears is not fully appreciated.	102			Data doubts and comments on process	The proposal to remove the Yellowstone population of grizzly bears from status as endangered or threatened should not be recommended. The criteria that the agency have been using to make that recommendation are too narrow, so that the predicament of those bears is not fully appreciated. Three considerations seem to be outstanding. First, the bears in this region are finding it increasingly difficult to find decent food resources throughout the year, on account of the effects of climate change, including phenological effects in high-elevation ecosystems, and the alarming growth in the numbers of the mountain pine beetle. Secondly, the genetic diversity of these bears is not great, so the sustainability of the population as a whole is unusually insecure; in light of that, so far from their having to deal with being left with fewer protections, their population should be strengthened by finding increased protections for reliable migration corridors connecting their region to regions to the north where other grizzlies are thriving. Thirdly, the bears' human environment was never good: human neighbors mistrust them at best, or actively go about seeking their removal; hunters covet collecting their body-parts as trophies; and local and state governments lack the political will to protect them, if they're even aware that they need protecting, and are at all sympathetic to that cause. With regard to that third consideration more generally, it is not clear that the agency take full account of the human environment of wild animals when they assign them a regulatory survival status. It's very fair for us to think of the situation of another species of mistrusted predator in the midst of hostile human neighbors, the re-introduced "Mexican" gray wolves of southern Arizona and New Mexico, a situation that has been poorly regulated and maintained and as a result remains highly insecure, especially because of failures to appreciate the behavior of human beings. Those of us who hope for a strong and resilient population of grizzlies in the Yellowstone region, secure in their home and well-connected to other populations of their kind, dread the thought that they may be left in a predicament not unlike that of the Mexican wolves, with no human friends to help them secure their future, but rather having to rely on the tender mercies of neighbors who neither understand them nor sympathize with them nor even so much as like them.	FWS-R6-ES-2016-0042-2964	

The impact of climate change on Yellowstone's grizzlies is summarily dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the blithe statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence.	103			Data doubts and comments on process	My comment is included in the uploaded file. Attachments 5-4-16GrizzCommentFinal	FWS-R6-ES-2016-0042-2973	
The IGBST has been less than transparent about making taxpayer funded data (which they have maintained an exclusive monopoly) available for scrutiny by the larger scientific community. All raw data on grizzly bears collected by government agencies should be made available to independent scientists. In view of the wide disagreement about delisting decisions, the USFWS should establish a review panel of independent, academically qualified scientists who are not involved in current grizzly bear research in the GYE.	102	103		Data doubts and comments on process	My comment is included in the uploaded file. Attachments 5-4-16GrizzCommentFinal	FWS-R6-ES-2016-0042-2973	
Yellowstone National Park where the grizzly was concentrated is high plateau, and is increasingly subject to biological effects of global warming - the longer nonfreezing days have caused a whitebark pine die-off, sending the grizzly already from the protected habitat outward to seek other forage. Thus the core population, relatively unknown due to the animal itself, has most likely fallen. The population estimates of Seervheen and others is almost certainly higher than actual numbers. Because of these issues, it will remain premature to delist the grizzly bear UNTIL robust habitat connectivity (with NO human take within those corridors) is created.	103	102		Data doubts and comments on process	1. At present the Yellowstone area Grizzlies do NOT have a robust connection to any larger metapopulation in order to maintain or increase heterozygosity. This means that it is SURE that the small populatino will slowly trend to homozygosity - inbreeding vulnerabilities. 2. Wyoming and other states attempt consistently to use public sport hunting to manage wildlife - this practice does NOT affect any population in a naturally-selected manner, and due to the small population, increasae the likelihood of removing the healthy members of any population. In the case of the grizzly bear, this practice would immediately cause the viable healthy component members to decrease in relation to the whole. NO state dshould be allowed to manage small predator populations, as the selection is artificial, not relating to heterozygosity, individual health, age, or any other parameter which nature normally selects - it is thus catastrophic in effect. The populatin, isolated aas it is, cannot sustain catastrophic human exploitation. Predators are not selected for human culling, attack, exploitation, and such activity would change the nature of the grizzly in ways most likely deleterious to the species and its trophic niche. 3. Wyoming has counties who already attempt to limit the species, by laws against grizzly in county, EVEN IF THAT AREA IS FEDERAL PUBLIC LAND. This decreases habitat and connectivity, and the act of delisting will cause a sudden change - a diminution - of viable habitat. the plan does NOT take this into account. 4. Yellowstone National Park where the grizzly was concentrated is high plateau, and is increasingly subject to biological effects of global warming - the longer nonfreezing days have caused a whitebark pine die-off, sending the grizzly already from the protected habitat outward to seek other forage. Thus the core population, relatively unknown due to the animal itself, has most likely fallen. The population estimates of Seervheen and others is almost certainly higher than actual numbers. Because of these issues, it will remain premature to delist the grizzly bear UNTIL robust habitat connectivity (with NO human take within those corridors) is created. The obama administration has consistently attempted to kill off large predators through political corruption in using political deals to get their party into office. The republican party corruptly attempts to delist endangered species for private and corporate exploitation. These are profoundly unethical reasons for present and past removals and attempts to remove large predators from ESL while they are still at numbers far lower than population modeling well-supported by experiment and consensus, suggest that a proper number of individuals preventing trend to homozygosity, are. Merely because a small group of consumptive wildlife killers desire to kill North American wildlife, is NOT a reason to rush delisting, before the population can clearly be understood to be self-sustaining over 40 or 100 more generations. The ONLY conditions under which delisting can ethically and ecologically be	FWS-R6-ES-2016-0042-2990	

With current birth rates and mortality rates, the grizzly bear population is in decline. More bears are being killed than are being born. The numbers I use below are taken from an IGBST study in September 2012 ("Updating and evaluating approaches to estimate population size and sustainable mortality limits for Grizzly bears in the Greater Yellowstone Ecosystem" - http://nrmssc.usgs.gov/files/norock/IGBST/GYEGBMonMortWksRpt2012(2).pdf) Firstly it notes that the population has grown between zero and 2.2% from 2002 to 2012. Meaning minimal growth. Your own scientists are telling you that the population is static at best. Secondly - Assuming there are 714 grizzlies in 2016, which IBSGT state is the number. 27% of these are females of 5 and over that can give birth to young. They give birth to an average of 2 cubs every 3 years. The survival rate of the cubs is 55%. So that gives a population increase of 59 bears per year. $714 @ 27\% = 192$ reproducing females, $192/3 = 64$ bears giving birth in a year, Average 2 cubs per cycle = 108, Survival rate of 55% = 59 young bears born and survive each year. Thirdly, the mortality rate of 61 in 2015 (https://www.usgs.gov/data-tools/2015-known-and-probable-grizzly-bear-mortalities-greater-yellowstone-ecosystem) does include some of these cubs (10 to be exact) so it would be double counting to say the birth rate minus the death rate is a true number. But the report also states that 1 bear dies for 2 that are documented, so 61 deaths could be something like 90 deaths. The	102	103		Data doubts and comments on process	I oppose removing the GYE Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. With current birth rates and mortality rates, the grizzly bear population is in decline. More bears are being killed than are being born. The numbers I use below are taken from an IGBST study in September 2012 ("Updating and evaluating approaches to estimate population size and sustainable mortality limits for Grizzly bears in the Greater Yellowstone Ecosystem" - http://nrmssc.usgs.gov/files/norock/IGBST/GYEGBMonMortWksRpt2012(2).pdf) Firstly it notes that the population has grown between zero and 2.2% from 2002 to 2012. Meaning minimal growth. Your own scientists are telling you that the population is static at best. Secondly - Assuming there are 714 grizzlies in 2016, which IBSGT state is the number. 27% of these are females of 5 and over that can give birth to young. They give birth to an average of 2 cubs every 3 years. The survival rate of the cubs is 55%. So that gives a population increase of 59 bears per year. $714 @ 27\% = 192$ reproducing females, $192/3 = 64$ bears giving birth in a year, Average 2 cubs per cycle = 108, Survival rate of 55% = 59 young bears born and survive each year. Thirdly, the mortality rate of 61 in 2015 (https://www.usgs.gov/data-tools/2015-known-and-probable-grizzly-bear-mortalities-greater-yellowstone-ecosystem) does include some of these cubs (10 to be exact) so it would be double counting to say the birth rate minus the death rate is a true number. But the report also states that 1 bear dies for 2 that are documented, so 61 deaths could be something like 90 deaths. The mortality rate is likely to increase. The very high mortality rate of 2015 will become the rule, not the exception. And that's before delisting and before hunting is allowed. There are minimal investigations into bear killings, and minimal deterrents (fines, imprisonment). Hunters and ranchers are killing bears with impunity. For example the killer of "Scarface" is still not known. In addition there are increased killing of conflict bears by USFWS and the Game & Fish departments as bears look for food further afield. In summary 59 bears born and survive each year and a mortality rate of around 90 means the population is declining and will continue to decline. I oppose removing the GYE Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife	FWS-R6-ES-2016-0042-2989	
The affects of this decision need to be analyzed for all likely foreseeable direct, indirect and cumulative effects on the species.	103			Data doubts and comments on process	Please, do not delist the Greater Yellowstone population of grizzlies from the Endangered Species list. The affects of this decision need to be analyzed for all likely foreseeable direct, indirect and cumulative effects on the species. This includes changes in land use as a result of the delisting including: hunting, change in land uses, logging, increased accidental and poaching of bears, reduced penalties for illegal kills that could lead to greater bear deaths, reduced breeding due to bear removal, greater stress on the bears that reduces reproduction, killing of sows and related reduction in reproduction and cumulative effects of climate change and increased resource extraction as a result of a decision to delist. There needs to be a complete analysis of all effects as a result of the delisting. I urge you to not delist at this time, as there are many effects that need to be evaluated and in the case of climate change it is a likely foreseeable effect that will result in reduced habitat quality and quantity, changes in habitat spatial arrangement that could affect the species and reduced habitat quality due to greater resource extraction in areas that are now critical habitat for bear recovery. I will talk to you in any format, you can call me at 509 6303594 or write me at 200 S. Kent Place East Wenatchee, Wa. 98802. Sincerely Kevin Kane	FWS-R6-ES-2016-0042-3036	

Sixty percent of prominent grizzly bear scientists "believe delisting would be an incorrect decision, or at the very least a violation of the precautionary principle." Who are we to argue with the experts?	100			Data doubts and comments on process	I am very disturbed to hear that the US Fish & Wildlife Service is considering the delisting of grizzly bears in the Great Yellowstone Ecosystem (GYE). According to statistics, at one time, grizzly bears ranged from northern Mexico to Alaska. In the early 1800s, as many as 50,000 grizzlies were found in the lower 48 states. Through hunting, humans have largely killed them off. Human-caused mortality is the single largest contributor of bear deaths. Today, their number has dropped to between 1,400 and 1,700. Of these numbers, only 674 to 839 are believed to be in the GYE in 2014. Even that small number may be an over-count, according to some biologists. We must protect these grizzly bears from extinction. If Federal protections are removed, state managers will open hunting seasons on GYE grizzly bears. The Idaho, Montana, and Wyoming wildlife managers will be responsible for what happens to these grizzlies. Many federal judges themselves have commented on how poorly these managers handled the wolf situation in their areas. These same state managers will also decide what types of hunting methods will be allowed. We must fight off any attempt to allow cruel and unsporting methods, such as hunting over bait and chasing bears with packs of GPS collared hounds. Trophy hunters, outfitters and guides, as well as livestock producers have been calling for grizzly hunting seasons for years. In fact, these wildlife managers have already laid plans to parcel out the GYE grizzlies to trophy hunters if they are delisted. Allowing these bears to be hunted would not only result in the direct deaths of the grizzlies who end up as rugs, but also the bears who escape the hunt and die from related injuries, as well as orphaned cubs unable to survive on their own. When hunting is allowed during the Fall, when the grizzlies are eating heavily to gain weight for hibernation, this costs the bears precious energy. This cost early in a female's life may negatively impact a lifetime of reproduction. Hunting directly affects population growth rates and can indirectly affect sex and age structure of a population and change social organization. Hunting causes greater changes in a population than do natural processes. Sixty percent of prominent grizzly bear scientists "believe delisting would be an incorrect decision, or at the very least a violation of the precautionary principle." Who are we to argue with the experts? Climate change and the loss of important food sources also concern bear biologists. If the cause of these beautiful animals is not enough to trouble you and persuade you to support their interests, keep in mind that Millions of grizzly-bear watching tourists spend tens of millions of dollars each year benefitting the local economies of the Northern Rockies. With the loss of its bears, Yellowstone National Park could lose \$10 million tourism dollars annually. (Source: Wilkinson, Todd. 2015. What's Next for Yellowstone's Grizzlies? National Geographic. October 1)	FWS-R6-ES-2016-0042-3100	
There needs to be a complete analysis of all effects as a result of the delisting. I urge you to no delist at this time, as there are many effects that need to be evaluated and in the case of climate change it is a likely foreseeable effect that will result in reduced habitat quality and quantity, changes in habitat spatial arrangement that could affect the species and reduced habitat quality due to greater resource extraction in areas that are now critical habitat for bear recovery.	103			Data doubts and comments on process	Please, do not delist the Greater Yellowstone population of grizzlies from the Endangered Species list. The affects of this decision need to be analyzed for all likely foreseeable direct, indirect and cumulative effects on the species. This includes changes in land use as a result of the delisting including: hunting, change in land uses, logging, increased accidental and poaching of bears, reduced penalties for illegal kills that could lead to greater bear deaths, reduced breeding due to bear removal, greater stress on the bears that reduces reproduction, killing of cubs and related reduction in reproduction and cumulative effects of climate change and increased resource extraction as a result of a decision to delist. There needs to be a complete analysis of all effects as a result of the delisting. I urge you to no delist at this time, as there are many effects that need to be evaluated and in the case of climate change it is a likely foreseeable effect that will result in reduced habitat quality and quantity, changes in habitat spatial arrangement that could affect the species and reduced habitat quality due to greater resource extraction in areas that are now critical habitat for bear recovery. I will talk to you in any format, you can call me at 509 6303594 or write me at 200 S. Kent Place East Wenatchee, Wa. 98802. Sincerely Kevin Kane	FWS-R6-ES-2016-0042-3036	

One of the most important points to also include is that upon further research we do NOT feel that the Endangered Species Act is being followed as far as the NECESSARY CRITERIA HAS NOT BEEN MET TO INSURE THE SUSTAINABILITY OF THE GRIZZLY IN THE GREATER YELLOWSTONE REGION in the delisting of an endangered species from the list. It is sad that this proposed delisting is political based and not science based. At this time, in reflection of the above points we have made in both part one and part two, regarding the proposed delisting of the Grizzly, we DO NOT agree with the proposal to delist the Grizzly in the Greater Yellowstone Region and urge USFWS to postpone this proposal to delist them at this time.	102	103		Data doubts and comments on process	PART 2 OF OUR OFFICIAL COMMENT: -In Wyoming, Montana and Idaho, the snow pack was average and the temperatures high for this time of year. Acknowledging the possible threat of wildfires in the Greater Yellowstone ecosystem as was experienced in Glacier National Park this past year would be catastrophic for the grizzlies. - What's the rush? There are too many unknowns right now, regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population. Why not wait five years to see how the population is responding to these threats? -Grizzly bears have one of the lowest reproductive rates of all terrestrial mammals in North America. This is due to numerous ecological factors. Grizzly bears do not reach sexual maturity until they are at least five years old. Once mated with a male in the summer, the female delays embryo implantation until hibernation, during which miscarriage can occur if the female does not receive the proper nutrients and caloric intake. On average, females produce two cubs in a litter and the mother cares for the cubs for up to two years, during which time the mother will not mate. Once the young leave or are killed, females may not produce another litter for three or more years, depending on environmental conditions. Male grizzly bears have large territories, finding a female scent difficult in such low population densities. Population fragmentation of grizzlies may destabilize their number. The grizzly bear has several relationships with its ecosystem. One such relationship is a mutualistic relationship with fleshy-fruit bearing plants. After the grizzly consumes the fruit, the seeds are excreted and thereby dispersed in a germinable condition. Some studies have shown germination success is indeed increased as a result of seeds being deposited along with nutrients in feces. This makes grizzly bears important seed distributors in their habitats. While foraging for tree roots, plant bulbs, or ground squirrels, bears stir up the soil. This process not only helps grizzlies access their food, but also increases the species richness in alpine ecosystems. An area that contains both bear digs and undisturbed land has greater plant diversity than an area that contains just undisturbed land. Along with increasing species richness, soil disturbance causes nitrogen to be dug up from lower soil layers, and makes nitrogen more readily available in the environment. An area that has been dug by the grizzly bear has significantly more nitrogen than an undisturbed area. Grizzlies directly regulate prey populations and also help prevent overgrazing in forests by controlling the populations of other species in the food chain. An experiment in Grand Teton National Park in Wyoming showed that the removal of wolves and grizzly bears caused populations of their herbivorous prey to increase. This, in turn, changed the structure and density of plants in the area, which decreased the population sizes of migratory birds. This provides evidence that grizzly bears represent a keystone predator, having a major influence on the	FWS-R6-ES-2016-0042-3155	
Groups including the Sierra Club, Defenders of Wildlife, the Humane Society, the Center for Biological Diversity and the Natural Resource Defense Council all released statements saying the delisting was "premature". They argue that the Yellowstone bear population isn't that stable. In specific they stated: "The Yellowstone grizzly bear population is isolated from other populations of bears. They've also been experiencing high levels of conflicts this year with people," said Sylvia Fallon with the National Resources Defense Council. "And their population has not grown and is likely declining. That's following the loss of white bark pine, which is a critically important food source for them." The conservation groups are urging the U.S. Fish and Wildlife Service to undertake more research instead of removing protection for the Yellowstone grizzlies.	102	103		Data doubts and comments on process	USFWS, please listen to the environmental groups that oppose the proposal to take the Yellowstone Grizzlies off the Endangered Species List. Groups including the Sierra Club, Defenders of Wildlife, the Humane Society, the Center for Biological Diversity and the Natural Resource Defense Council all released statements saying the delisting was "premature". They argue that the Yellowstone bear population isn't that stable. In specific they stated: "The Yellowstone grizzly bear population is isolated from other populations of bears. They've also been experiencing high levels of conflicts this year with people," said Sylvia Fallon with the National Resources Defense Council. "And their population has not grown and is likely declining. That's following the loss of white bark pine, which is a critically important food source for them." The conservation groups are urging the U.S. Fish and Wildlife Service to undertake more research instead of removing protection for the Yellowstone grizzlies. USFWS, please follow their recommendation and refrain from delisting the Yellowstone Grizzlies.	FWS-R6-ES-2016-0042-3251	

FWS is ignoring poll numbers that the Humane Society of US and Wyoming Wildlife Advocates showing that 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. And, more than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. In addition, 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. This is not the right time for delisting the grizzly. They stand little chance in the current climate to increase or actually even maintain their population should delisting occur.	100	103		Data doubts and comments on process	Regarding Delisting the grizzly in the Greater Yellowstone Ecosystem - I am opposed to delisting the grizzly in the GYE. The population of grizzly in the GYE has not recovered enough to sustain itself once hunting is allowed, and particularly if trophy hunting is allowed. It's disgusting to me that FWS has spent 40 years recovering the population and wants to squander it away in a couple years - which is all it will take, if that. Quoted from David Mattson (who has spent 20 years studying the GYA grizzly) on Montana Public Radio, "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS is ignoring poll numbers that the Humane Society of US and Wyoming Wildlife Advocates showing that 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. And, more than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. In addition, 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. This is not the right time for delisting the grizzly. They stand little chance in the current climate to increase or actually even maintain their population should delisting occur.	FWS-R6-ES-2016-0042-3245	
Too much conflicting data (pro/con) for the lay public to draw valid conclusions	100			Data doubts and comments on process	See Attached Attachments Payne Mark	FWS-R6-ES-2016-0042-3270	
EXPERTS OPPOSE REMOVING GRIZZLIES FROM THE ENDANGERED SPECIES LIST. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted.	100			Data doubts and comments on process	DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears. - GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, it is particularly vulnerable to excessive killing by humans. Last year, saw 59 grizzlies killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow reproducing species. - NEARLY 50 TRIBES OPPOSE DELISTING OF GRIZZLIES. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly oppose delisting and hunting of these bears, which they consider to be sacred animals. - EXPERTS OPPOSE REMOVING GRIZZLIES FROM THE ENDANGERED SPECIES LIST. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted. Based on what I've learned, the PEOPLE don't want this...so why are you working against the same people who put you in office. People who keep you employed. If the American population doesn't want this and experts are saying we shouldn't do it, then why are you? That's the question you need to ask yourself. Are you being fueled by money, unethical money, lack of morals? I think you need to get your ego checked. Stop thinking mankind is above animals because we are not. All Lives Matter. Anything that breathes feels and knows what is happening. Plus bears are very docile - they don't attack people, so why are YOU scared of them? What are YOU scared of that makes you want to delist them?	FWS-R6-ES-2016-0042-3247	

While the conclusions of certain studies upon which the FWS relies suggest that grizzly bears have reached their carrying capacity, there is ample support for an alternative theory that bears have lost their historic dietary staples and are now turning to both native and domestic ungulates, putting them in closer proximity to humans, wolves and/or other bears. While this shift is occurring it is impossible to predict whether and when the Yellowstone grizzly bear population might reach its carrying capacity. FWS is not scientifically justified in concluding with certainty that the Greater Yellowstone population has reached long-term stability and is therefore secure for the foreseeable future. There is far too much uncertainty reflected in the current science to justify such a conclusion; rather, the best available science and the precautionary principle demands continued federal monitoring of this vulnerable population, which will only happen with continued ESA protection.	101	102		Data doubts and comments on process	Please see the attached comment letter. I urge FWS not to remove grizzly bears from protections under the ESA, and I strongly oppose trophy-hunting of grizzly bears. Attachments Oppose grizzly delisting_comment letter_May 2016	FWS-R6-ES-2016-0042-3274	
also having spent the previous 40 years observing wild Grizzly Bears in the region I vehemently object to FWS alarming & disturbing attempt to sell its fiction of YGB recovery to a highly attuned and skeptical public on delisting of the YGB, a population clearly in decline, from ESA, this is dangerous and irresponsible also egregiously deficient in its unreferenced claims by not using the "best available science" as required by law. Over 70 grizzlies were killed by human activity, 10% of the known pop in the midst of millennial drought 2015 the hottest year on record for an animal with the slowest reproductive rate in North America. Vast declines in cutthroat trout, elk & moths causing YGB to redistribute itself in search of food which unnaturally fragments & divides the animals numbers by the extent of their redistribution (Mattson 2016) yet FWS density data could never reflect this as a result its conflated aerial counts of pop estimates. FWS says new food sources will do for them but all that awaits YGB in delisting is the gun barrel of the trophy hunter, now is not the time for YGB pop in trouble to be harvested for the entertainment of others. FWS ostensibly tells the public there's no more room for bears which contradicts the very spirit of ESA while undermining the intent of the law FWS is entrusted with by the people!	102	101		Data doubts and comments on process	See attached file(s) Attachments Comment on Grizzly Bear Delisting 5.10.16	FWS-R6-ES-2016-0042-3434	

FWS has exclusive monopoly on raw data on YGB, data that is owned by taxpayers that FWS refuses to release. Without free and unhindered access to data how can the public possibly trust FWS with our bears? In its haste to delist FWS conspicuous omissions look to be for the sole purpose of supporting its agenda to give bear management to the states where a trophy hunt aka "discretionary mortality" is already for sale. \$150 per head is Americas return on investment. FWS is entirely overly optimistic when monopolizing the publics data by making unproven assertions of secure environment for YGB while dismissing impact of highly dynamic factors ie Anthropogenic Climate Change (ACC) "therefore we conclude that the effects of climate change do not constitute a threat to the GYE Grizzly Bear now, nor is it anticipated to in the future" declaring that ACC "effects may even make habitat more suitable and food sources more abundant" (Servheen2010 p4) so FWS is endorsing ACC now, great just what we need more catastrophic ACC for YGB even as ample evidence of ACC is sighted in the Rule (13216-13217). Schizophrenic, FWS still says no problem YGB are adaptable yet with no supporting evidence provided. YGB requires seasonally reliable highly nutritional foods to sustain itself which FWS does not identify. The YGB is evolutionarily unique and isolated pop with distinct ancient ties to a Yellowstone now in the midst of deteriorating environmental conditions from ACC excessive	101	102	103	Data doubts and comments on process	See attached file(s) Attachments Comment on Grizzly Bear Delisting 5.10.16	FWS-R6-ES-2016-0042-3434	
Acknowledging that precise calculations are not always possible in the conservation and ecology oriented applied sciences, a problem develops. New factors, such as global warming, gene pool isolation and increased concentrations of chemical residues in soils have rendered the previous calculations obsolete or incorrect. The fish and wildlife service must, as a matter of public trust, err on the side of caution and not remove the grizzly bears from the endangered species act. Their reproduction rate is lower than any North American mammal. Delisting and allowing hunting could lead to their demise in only a few short years.	103	102		Data doubts and comments on process	Don't delist the Yellowstone grizzly bears. Acknowledging that precise calculations are not always possible in the conservation and ecology oriented applied sciences, a problem develops. New factors, such as global warming, gene pool isolation and increased concentrations of chemical residues in soils have rendered the previous calculations obsolete or incorrect. The fish and wildlife service must, as a matter of public trust, err on the side of caution and not remove the grizzly bears from the endangered species act. Their reproduction rate is lower than any North American mammal. Delisting and allowing hunting could lead to their demise in only a few short years. Do NOT delist the grizzly bears!	FWS-R6-ES-2016-0042-3457	

A Reliable source, (Mattson, 2016) states that "dramatic increases in grizzly bear activity on moth sites have also contributed to inflated estimates of growth for the Yellowstone grizzly bear population. Bears on moth sites are almost certain to be seen by airborne researchers and managers out looking for females with cubs-of-the-year. "	103			Data doubts and comments on process	Delisting the Grizzly bear from Endangered species status is a bad idea. My understanding is that there has been a 6-10% multi-causal mortality of the Yellowstone population of Grizzly Bears during 2015. This level of mortality is not sustainable and hardly indicates a recovered population. Common sense would dictate that this trend needs to be followed for several years before management is turned over to three states that are hostile to co-existence with large carnivores. A Reliable source, (Mattson, 2016) states that "dramatic increases in grizzly bear activity on moth sites have also contributed to inflated estimates of growth for the Yellowstone grizzly bear population. Bears on moth sites are almost certain to be seen by airborne researchers and managers out looking for females with cubs-of-the-year. " Endangered species status seemed to result in a dramatic recovery of the population over the past three decades. (until 2015)There will be inconsistent management of the Grizzly as a nuisance or as a potential trophy by Idaho, Montana and Wyoming. This will put the population at great risk. Hunters will claim that they had to shoot a bear in self- defense. Bears habituated to large metal objects (cameras) in Yellowstone NP will be treated very differently when confronted by large metal objects (rifles) outside of Yellowstone. How did the USFWS account for climate change in making this decision? Three of the Grizzly Bear's main food sources (pine nuts, elk, and cutthroat trout) are in decline. As someone who has spent much time observing and photographing bears in the wild, the magnificent Grizzly is a symbol of the wildness that remains in the American West. The Grizzly is a source of inspiration and is worshipped by many Americans. Those interested in sport hunting can travel to Alaska where the Alaskan Grizzly and Brown Bear are not endangered and have a stable food source. Would the USFWS please disclose the special interests that have been involved in their recommended delisting decision. I urge the USFWS to make a decision regarding the Grizzly Bear that is science based and not driven by political interests. Please expand the Primary Conservation Area for the Yellowstone Grizzly to include all of the known moth sites, and then protect these sites and a substantial surrounding area from any sport hunting. Better yet, please continue ESA for the Yellowstone Grizzly Howie Garber MD	FWS-R6-ES-2016-0042-3453	
It's my understanding that (Sec. 4(a)(1)(D)) of the ESA requires adequacy of existing regulatory mechanisms **before** animals can be removed from the endangered species list. If Montana has only listed today the hunting regs they are going to use once the grizzlies are delisted, how much time could the USFWS possibly have had to study that plan to determine its adequacy?The impression i'm getting is that they're just a great big bunch of "good ole boys" who make a wild arse guess then do whatever they please because there isn't anyone that can stop them.	103			Data doubts and comments on process	It's my understanding that (Sec. 4(a)(1)(D)) of the ESA requires adequacy of existing regulatory mechanisms **before** animals can be removed from the endangered species list. If Montana has only listed today the hunting regs they are going to use once the grizzlies are delisted, how much time could the USFWS possibly have had to study that plan to determine its adequacy? The impression i'm getting is that they're just a great big bunch of "good ole boys" who make a wild arse guess then do whatever they please because there isn't anyone that can stop them.	FWS-R6-ES-2016-0042-3475	
Listen to the voices of scientists who have appealed to your poor and biased decision to remove the bears from esa protection. Listen to the comments from the public which are overwhelmingly against delisting Grizzlies.	105			Data doubts and comments on process	I am opposed to delisting the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal list of endangered species. The decision is premature and does not adequately factor in the decline of their main food sources due to climate change. There is no scientific reason to hunt Grizzly Bears, they are slow to reproduce and need protection, not targets on their back for the benefit of the constantly declining special interests of trophy hunters. Listen to the voices of scientists who have appealed to your poor and biased decision to remove the bears from esa protection. Listen to the comments from the public which are overwhelmingly against delisting Grizzlies. Stop listening to the diminished and shrieking voices of the minority who find pleasure in killing public wildlife for their own sick personal benefit.	FWS-R6-ES-2016-0042-3525	

FWS claims there is a large and healthy population of bears but scientists and even the former NPS superintendent of Yellowstone have questioned the studies numbers and methodology. FWS is also claiming bears are not suffering adversely from the loss of 2 major food sources, the cutthroat trout and whitebark pine. It is too early to be sure what long term affect this will have on the bears but 2015 was a record year for Grizzlies killed around Yellowstone and as bears are forced out of the national park in search of food they will be left vulnerable to being shot without protections imparted by the endangered species act. Delisting the grizzly bears could result in decades of recovery work being lost in a few short years under state management which will allow trophy hunting, according to a memo between the states widely circulated in the media.	102	103		Data doubts and comments on process	I am opposed to the delisting of the Yellowstone grizzly bear. As a long time resident and guide in Yellowstone National Park I have serious concerns about the future of the grizzly bear and the sustainability of their population. FWS claims there is a large and healthy population of bears but scientists and even the former NPS superintendent of Yellowstone have questioned the studies numbers and methodology. FWS is also claiming bears are not suffering adversely from the loss of 2 major food sources, the cutthroat trout and whitebark pine. It is too early to be sure what long term affect this will have on the bears but 2015 was a record year for Grizzlies killed around Yellowstone and as bears are forced out of the national park in search of food they will be left vulnerable to being shot without protections imparted by the endangered species act. Delisting the grizzly bears could result in decades of recovery work being lost in a few short years under state management which will allow trophy hunting, according to a memo between the states widely circulated in the media. As a guide in Yellowstone park, I rely on wildlife being visible for my clients. Delisting the grizzly is bad for bears, bad for business and wrong for Yellowstone.	FWS-R6-ES-2016-0042-3544	
Population Estimates While as accurate population estimate is difficult in a large, rugged area like the Greater Yellowstone Ecosystem, it is essential for any post-delisting decisions regarding sport hunting of grizzlies.. The methods used by the IGBST to estimate bear population numbers are highly questionable as can be seen in peer-review, scientific literature. In the interests of true science on which to base appropriate decisions, all data regarding grizzly numbers needs to transparent & available for independent scientific analysis & review.	102	105		Data doubts and comments on process	Please see below Attachments 160507 Grizzly bears	FWS-R6-ES-2016-0042-3400	
Scientific Accountability Scrutiny by the larger scientific community is essential & a normal part of evidence based science for translation into practice. All raw data on grizzly bears collected by government agencies should be made available & a review panel of independent, qualified scientists must be established in order to achieve the written goals of the rule & meet the requirements of legislation.	102	103		Data doubts and comments on process	Please see below Attachments 160507 Grizzly bears	FWS-R6-ES-2016-0042-3400	

Where is the transparency in releasing data collected by your government. The IGBST is not releasing this, and that makes this situation look a lot more deplorable than it POSSIBLY is. Without evidence being able to be scrutinized by people outside of government and people with nil vested interests having a say in this decision how do we know that this decision is correct and honorable.	105	102	Data doubts and comments on process	Only a few days ago I heard about the Proposed Rule to remove the Grizzly Bears within the Greater Yellowstone Ecosystem off the Federal List of Endangered and Threatened Wildlife list. This is to be done by the Fish and Wildlife Service. Many reasons for this have been explored in information offered, but this is where I think things become simple. You are either for the bears or against. In the research and explanations offered I am reading a text that is not only against these bears, but has been created in a way that I think appears biased in removing them from the list and I cannot fathom why this would be the case when it should be unbiased and simply based on facts gathered from multiple sources and from people with education in multiple disciplines. I am for the bears. I have an understanding that you believe their ecosystem will/has become incapable of supporting the current population, and that in the future the ecosystem will not be able to support them. I cannot fathom how studies into how to support their ecosystem have not been considered. You could not feign no knowledge of these issues when the bears have been so closely monitored over so many years. Where are the cutthroat trout, what can be done to ensure growth in this area, instead of the constant decline in numbers. Are the bears incapable of eating Lake trout and if this is the case why were they introduced to the ecosystem? What of the Whitebark pine seeds. If fires and beetles have seen a sharp decline in available food from these trees, what has been done since 1988 to replace what was lost. See, if you were for the bears all of these missing links in their ecosystem would have been on the to do list, would have been taken care of, so who dropped the ball? Is shooting Grizzlies in Yellowstone the answer, I don't think so. If your bears in your park are going to starve to death then look at how to fix it, not kill the bears so as to try to fool people. Where is the transparency in releasing data collected by your government. The IGBST is not releasing this, and that makes this situation look a lot more deplorable than it POSSIBLY is. Without evidence being able to be scrutinized by people outside of government and people with nil vested interests having a say in this decision how do we know that this decision is correct and honorable. Public Relations. My friends have visited your lovely park, and I had plans in the future to make this one of my destinations as they want to go back. I will not visit. Not only will I not visit, but I will tell anyone I know not to visit, not to support and not to participate. Without the draw card of me visiting Yellowstone I have no other reason to travel to your country in which case I will never visit and you will not get my money. Please take that seriously. I had always wanted to see Canada, but their recent decision to kill Polar Bears has now made me declare that I won't, and I am spreading the word rapidly about what they have done. ~~Wait and see what a disaster it will be for them if you really need proof. I cannot conceive that a country that I wish to comment on the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I wish to strongly oppose such a removal for the following reasons:~~	FWS-R6-ES-2016-0042-3745	
I wish to strongly oppose such a removal for the following reasons: 1.Climate Change Impacts Climate change is a real, scientific and provable issue and the park and its inhabitants have already been affected. To dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." with no proper scientific evidence is laughable.The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule, which is highly questionable. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population. This leads into my second point.	103		Data doubts and comments on process	~~1.Climate Change Impacts Climate change is a real, scientific and provable issue and the park and its inhabitants have already been affected. To dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." with no proper scientific evidence is laughable.The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule, which is highly questionable. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population. This leads into my second point. 2. Declining food resources There is no evidence in The Rule for true accounting on this point. Historically, there have been four critical foods for grizzlies in Yellowstone: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are "generalists with a broad range in diet", but what really is important for maintaining the population is availability of high quality food at the right time of the year within an INTACT ECOSYSTEM. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. These four points have not been taken into consideration. This is unscientific. 3. Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase numbers in the ecosystem (ref. Fig. 1 p 13180, of The Rule). Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. Do the math: mortality levels of recent years is not sustainable. 4. Population Estimates A remote and rugged area such as the Greater~~	FWS-R6-ES-2016-0042-3805	

4. Population Estimates A remote and rugged area such as the Greater Yellowstone ecosystem posed problems for accurate measurement. Accuracy- real accuracy- is necessary for making such a huge decision about delisting. The current methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by any subsequent IGBST rebuttal and so I would think it fair and in the interests of rigorous science for all data regarding grizzly numbers to be made available for truly independent scientific analysis and review.	102	103	102	Data doubts and comments on process	I wish to comment on the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I wish to strongly oppose such a removal for the following reasons: 1. Climate Change Impacts Climate change is a real, scientific and provable issue and the park and its inhabitants have already been affected. To be dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." with no proper scientific evidence is laughable. The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule, which is highly questionable. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population. This leads into my second point. 2. Declining food resources There is no evidence in The Rule for true accounting on this point. Historically, there have been four critical foods for grizzlies in Yellowstone: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high-elevation talus slopes from lower elevation agricultural fields where they are a pest. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are "generalists with a broad range in diet", but what really is important for maintaining the population is availability of high quality food at the right time of the year within an INTACT ECOSYSTEM. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. These four points have not been taken into consideration. This is unscientific. 3. Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase numbers in the ecosystem (ref. Fig. 1 p 13180, of The Rule). Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. Do the math: mortality levels of recent years is not sustainable. 4. Population Estimates A remote and rugged area such as the Greater	FWS-R6-ES-2016-0042-3805	
The actual number of bears inhabiting the Greater Yellowstone Ecosystem is subject to methodology in inventory and may well be an indication of a stable population that would be adversely affected by removal from the endangered species list.	102			Data doubts and comments on process	I urge your agency to reconsider your intention to remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I have heard from a number of highly reputable scientists who argue that there is insufficient genetic variation in this isolated pocket of bears to maintain a healthy population. This situation could contribute to a precipitous crash in the population and in fact is a good argument for efforts to expand the range of these bears to include corridors to other known Grizzly populations to facilitate greater genetic diversity. The actual number of bears inhabiting the Greater Yellowstone Ecosystem is subject to methodology in inventory and may well be an indication of a stable population that would be adversely affected by removal from the endangered species list. There is absolutely no question that major food sources such as Whitebark pine nuts and Cutthroat trout are suffering rapid declines, and the early onset of spring has accelerated the emergence of hungry bears from their winter dens. We don't yet know how the radical and ongoing changes attributable to climate change will affect Grizzly bears, and I strongly argue for retaining the species on the Federal List of Endangered and Threatened Wildlife.	FWS-R6-ES-2016-0042-3953	

No one really knows how many grizzlies are in the GYE	102			Data doubts and comments on process	No one really knows how many grizzlies are in the GYE. The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foods, are a threat to the grizzly's long term survival. The bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine which is a critically important food source." Climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600 headed to 500 using their methods." Climbing back up from	FWS-R6-ES-2016-0042-4226	
THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT.	102			Data doubts and comments on process	Florida's Bear Hunt was a travesty with 300 bears killed in 2 days,some with babies even though that was against the rules. My family has a second home in Montana in Polson and this is just wrong. THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected. #DontDelistGrizzlies! #ROAR!	FWS-R6-ES-2016-0042-4229	

It appears there is still a significant amount of uncertainty regarding the factors which prevented delisting the first time around and the Rule offers only a very superficial effort to dismiss the shortcomings this time. The conclusions therefore are not reasonable and not based on the best available science. As the Service (and the courts) are aware, the Service is mandated to proceed with institutionalized caution. Its neither legally nor morally sound to simply roll the dice with the future of a threatened species.	102			Data doubts and comments on process	I strongly OPPOSE the planned delisting of Yellowstone area grizzly bears under the terms of the proposed Rule for the following reasons: I. The conclusions set forth in the Rule are not supported by the facts relied on by the Service. The Rule asserts the GYE population of grizzlies is recovered, sustainable, and will not be adversely impacted by the anticipated mortality resulting from hunting and management. However, the numbers dont add up. When you add the acknowledged slow down in growth due to white bark pine, which has cut population growth by 96% (7% to .3% on the high end), then add the 20% expected mortality from hunting, you are effectively imposing a cull on the GYE grizzly population. A population which the Rule never suggests is excessive. The Rule only suggests the population is now at carrying capacity. Add to this the 25 grizzlies killed by wildlife managers last year alone and the Rule clearly sets up a dramatic and adverse reduction in population numbers. Further, despite the white barn pine issue being critical to the 9th Circuits conclusion to prevent delisting, the Rule dismisses the impact of white bark pine with almost no substantive explanation. The Rule simply characterizes population slow down as carrying capacity without any meaningful explanation (or effort to refute) the correlation between population trend and availability of critical food sources. Further, the Rule acknowledges only one third of the population doesnt eat white bark pine; the other two thirds of the population do. The Service is required to treat the population as a whole, and the majority relies on white bark pine pine. It appears there is still a significant amount of uncertainty regarding the factors which prevented delisting the first time around and the Rule offers only a very superficial effort to dismiss the shortcomings this time. The conclusions therefore are not reasonable and not based on the best available science. As the Service (and the courts) are aware, the Service is mandated to proceed with institutionalized caution. Its neither legally nor morally sound to simply roll the dice with the future of a threatened species. II. State regulatory commitments clearly are not in place and are not explained. The Rule indicates over and over that viable state regulatory commitments must be in place before delisting can occur. However, the commitments are not detailed, not explained, and clearly are not binding. One of the publics biggest concerns appears to be the proposed hunting of grizzlies on the 12% of suitable habitat outside of park boundaries. What portion of the population is on the 12% outside boundaries? Whats the expectation of how much of the population will be exposed to potential hunting? What are the anticipated state commitments to ensure appropriate and sustainable hunting practices? None of this is detailed in the Rule. Further, it goes without saying that a decision to vest with the states the future of a threatened species, when those very states allowed the initial devastation to the population, is suspect. Particularly in the I am asking you to NOT delist grizzly bears in the Greater Yellowstone Ecosystem. The USFWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. However, David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. In reality, no one really knows how many grizzlies are in the GYE. Furthermore, population growth has stagnated since the early 2000's, and the Yellowstone grizzly population declined by 59 bears in 2015 alone. The USFWS also claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide. Therefore, the grizzly bear cannot be delisted in just the GYE. By USFWS own estimates, around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Furthermore, Yellowstone's Grizzly population has no connectivity with outside populations, and has not for the last 100 years. This means that today's population came from a gene pool of only 136 animals (the population low point in 1975. This lack of genetic diversity threatens the Yellowstone grizzly's survival in the long term. USFWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. Whitebark pine nuts have long been considered to be the single most important food source for grizzlies. In the last 20 years, whitebark pines have been decimated by both blister rust and pine beetles. The pine beetle epidemic has been linked to climate change. According to Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council, "Yellowstone grizzly bears are likely declining in the wake of the loss of whitebark pine, a critically important food source." USFWS claims that Montana, Idaho, and Wyoming will successfully use hunting to manage the recovered grizzly bear population.If GYE grizzly bears are delisted, the three states have already signaled that they will open up trophy hunting seasons for the bears. Wyoming holds the vast majority of grizzlies. I do not believe that Wyoming can be considered capable of maintaining populations of any large carnivore in a scientific manner, considering its dismal record of "managing" wolf populations. Its wolf management is so bad that it has had to be struck down in federal court twice. Only now that the wolf has been relisted in Wyoming are we finally seeing wolves again in Grand Teton National Park, which will prove to increase visitation to that park and consequently tourist revenue	FWS-R6-ES-2016-0042-4257	
David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. In reality, no one really knows how many grizzlies are in the GYE. Furthermore, population growth has stagnated since the early 2000's, and the Yellowstone grizzly population declined by 59 bears in 2015 alone.	102			Data doubts and comments on process	I am asking you to NOT delist grizzly bears in the Greater Yellowstone Ecosystem. The USFWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. However, David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. In reality, no one really knows how many grizzlies are in the GYE. Furthermore, population growth has stagnated since the early 2000's, and the Yellowstone grizzly population declined by 59 bears in 2015 alone. The USFWS also claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide. Therefore, the grizzly bear cannot be delisted in just the GYE. By USFWS own estimates, around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Furthermore, Yellowstone's Grizzly population has no connectivity with outside populations, and has not for the last 100 years. This means that today's population came from a gene pool of only 136 animals (the population low point in 1975. This lack of genetic diversity threatens the Yellowstone grizzly's survival in the long term. USFWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. Whitebark pine nuts have long been considered to be the single most important food source for grizzlies. In the last 20 years, whitebark pines have been decimated by both blister rust and pine beetles. The pine beetle epidemic has been linked to climate change. According to Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council, "Yellowstone grizzly bears are likely declining in the wake of the loss of whitebark pine, a critically important food source." USFWS claims that Montana, Idaho, and Wyoming will successfully use hunting to manage the recovered grizzly bear population.If GYE grizzly bears are delisted, the three states have already signaled that they will open up trophy hunting seasons for the bears. Wyoming holds the vast majority of grizzlies. I do not believe that Wyoming can be considered capable of maintaining populations of any large carnivore in a scientific manner, considering its dismal record of "managing" wolf populations. Its wolf management is so bad that it has had to be struck down in federal court twice. Only now that the wolf has been relisted in Wyoming are we finally seeing wolves again in Grand Teton National Park, which will prove to increase visitation to that park and consequently tourist revenue	FWS-R6-ES-2016-0042-4260	

Grizzly bear deaths are actually increasing in the ecosystem. From 2002-2011, grizzly deaths increased at a rate of 9-11% a year. Therefore, the population is not necessarily stable. With a stagnant growth rate and increasing death rate, why would USFWS even be considering removing these bears from the Endangered Species List? Please listen to the science - the best available science - and keep Yellowstone area grizzly bears protected under the Endangered Species Act.	102	103	101	Data doubts and comments on process	I oppose delisting of grizzly bears because (1) the population has not grown in recent decades, (2) death rates have actually increased, and (3) changes to food sources puts grizzly bears in greater conflict with humans. First, even the United States Fish & Wildlife Service concedes that the Yellowstone grizzly population has not grown since the early 2000s. Indeed, there are nearly as many bears in the ecosystem today as there were 15 years ago. It is true the bears are more visible but this is not due to a population increase. Rather, this is due to changing food sources which force grizzlies to range further in search of food. Even though they are omnivores, not all foods are created equal. We humans, as omnivores, know that a steak does not equal a salad. With the loss of whitebark pine, grizzlies have turned to a diet more focused on meat. This conversion to meat puts bears in greater conflict with humans - namely hunters and livestock operations. What happens when grizzlies conflict with humans? Grizzlies die. In fact, a record number of grizzly bears died in the Yellowstone ecosystem just last year. Moreover, 80% of adult grizzly deaths can be attributed to human causes. Grizzly bear deaths are actually increasing in the ecosystem. From 2002-2011, grizzly deaths increased at a rate of 9-11% a year. Therefore, the population is not necessarily stable. With a stagnant growth rate and increasing death rate, why would USFWS even be considering removing these bears from the Endangered Species List? Please listen to the science - the best available science - and keep Yellowstone area grizzly bears protected under the Endangered Species Act.	FWS-R6-ES-2016-0042-4244	
Grizzlies may be "generalists" when it comes to food supplies, but it is difficult to understand how you can dismiss the major dropoff in two of the GYE grizzly food sources, whitebark pine nuts and cutthroat trout, with a third major food source, cutworm moths, at high risk from the prospective drop in their availability with the introduction of GMO crops tailored to kill them in the fields where they spend most of their time. Only meat is left to the bears, along with minor food sources like forbs and grubs. And we all know the connection between meat carcasses and human interaction - whether with hunters, crossing roads or around ranchlands. It does not bode well for grizzlies. At a minimum, it seems that the diminishment of major food sources in the GYE should lead to a fuller consideration that the carrying capacity of the land has been reduced and the bears are ranging farther from their traditional territories in search of adequate diet replacements and this has not been fully evaluated in the Rule.	103			Data doubts and comments on process	Grizzlies may be "generalists" when it comes to food supplies, but it is difficult to understand how you can dismiss the major dropoff in two of the GYE grizzly food sources, whitebark pine nuts and cutthroat trout, with a third major food source, cutworm moths, at high risk from the prospective drop in their availability with the introduction of GMO crops tailored to kill them in the fields where they spend most of their time. Only meat is left to the bears, along with minor food sources like forbs and grubs. And we all know the connection between meat carcasses and human interaction - whether with hunters, crossing roads or around ranchlands. It does not bode well for grizzlies. At a minimum, it seems that the diminishment of major food sources in the GYE should lead to a fuller consideration that the carrying capacity of the land has been reduced and the bears are ranging farther from their traditional territories in search of adequate diet replacements and this has not been fully evaluated in the Rule. It also does not appear to be "best science" as required by law to dismiss predictions of habitat changes that will directly affect grizzly bears without a fuller exploration of this issue than is contained in the proposed Rule. I understand that taxpayer funded data that you use has not been made available to the greater scientific community or independent scientists for review before a decision is made final on an action that is still open to much disagreement. I live in the Paradise Valley north of YNP and listen and talk to scientists who are working on these issues and it does appear that, in fact, there is hard evidence available showing that the isolated grizzly bear population growth rate is flat, if not declining, for more than 10 years. For an animal in recovery with the slowest reproductive rate of any North American mammal, still today occupying only 2% of their historic habitat (and are you allowed under case law to delist isolated segments of a population listed as a single entity under the ESA? I do not think so!), and with a mortality rate of 10% in 2015, it appears to me that the Rule now open to comment is sorely lacking the kind of high level and THOROUGH analysis addressing these issues and more that is deserved by this iconic creature. Too much is at stake. Please consider re-opening your review and include a panel of independent, qualified scientists who are working separately from current grizzly research in the GYE.	FWS-R6-ES-2016-0042-4277	

It also does not appear to be "best science" as required by law to dismiss predictions of habitat changes that will directly affect grizzly bears without a fuller exploration of this issue than is contained in the proposed Rule.	102			Data doubts and comments on process	Grizzlies may be "generalists" when it comes to food supplies, but it is difficult to understand how you can dismiss the major dropoff in two of the GYE grizzly food sources, whitebark pine nuts and cutthroat trout, with a third major food source, cutworm moths, at high risk from the prospective drop in their availability with the introduction of GMO crops tailored to kill them in the fields where they spend most of their time. Only meat is left to the bears, along with minor food sources like forbs and grubs. And we all know the connection between meat carcasses and human interaction - whether with hunters, crossing roads or around ranchlands. It does not bode well for grizzlies. At a minimum, it seems that the diminishment of major food sources in the GYE should lead to a fuller consideration that the carrying capacity of the land has been reduced and the bears are ranging farther from their traditional territories in search of adequate diet replacements and this has not been fully evaluated in the Rule. It also does not appear to be "best science" as required by law to dismiss predictions of habitat changes that will directly affect grizzly bears without a fuller exploration of this issue than is contained in the proposed Rule. I understand that taxpayer funded data that you use has not been made available to the greater scientific community or independent scientists for review before a decision is made final on an action that is still open to much disagreement. I live in the Paradise Valley north of YNP and listen and talk to scientists who are working on these issues and it does appear that, in fact, there is hard evidence available showing that the isolated grizzly bear population growth rate is flat, if not declining, for more than 10 years. For an animal in recovery with the slowest reproductive rate of any North American mammal, still today occupying only 2% of their historic habitat (and are you allowed under case law to delist isolated segments of a population listed as a single entity under the ESA? I do not think so!), and with a mortality rate of 10% in 2015, it appears to me that the Rule now open to comment is sorely lacking the kind of high level and THOROUGH analysis addressing these issues and more that is deserved by this iconic creature. Too much is at stake. Please consider re-opening your review and include a panel of independent, qualified scientists who are working separately from current grizzly research in the GYE.	FWS-R6-ES-2016-0042-4277	
I understand that taxpayer funded data that you use has not been made available to the greater scientific community or independent scientists for review before a decision is made final on an action that is still open to much disagreement.	102			Data doubts and comments on process	Grizzlies may be "generalists" when it comes to food supplies, but it is difficult to understand how you can dismiss the major dropoff in two of the GYE grizzly food sources, whitebark pine nuts and cutthroat trout, with a third major food source, cutworm moths, at high risk from the prospective drop in their availability with the introduction of GMO crops tailored to kill them in the fields where they spend most of their time. Only meat is left to the bears, along with minor food sources like forbs and grubs. And we all know the connection between meat carcasses and human interaction - whether with hunters, crossing roads or around ranchlands. It does not bode well for grizzlies. At a minimum, it seems that the diminishment of major food sources in the GYE should lead to a fuller consideration that the carrying capacity of the land has been reduced and the bears are ranging farther from their traditional territories in search of adequate diet replacements and this has not been fully evaluated in the Rule. It also does not appear to be "best science" as required by law to dismiss predictions of habitat changes that will directly affect grizzly bears without a fuller exploration of this issue than is contained in the proposed Rule. I understand that taxpayer funded data that you use has not been made available to the greater scientific community or independent scientists for review before a decision is made final on an action that is still open to much disagreement. I live in the Paradise Valley north of YNP and listen and talk to scientists who are working on these issues and it does appear that, in fact, there is hard evidence available showing that the isolated grizzly bear population growth rate is flat, if not declining, for more than 10 years. For an animal in recovery with the slowest reproductive rate of any North American mammal, still today occupying only 2% of their historic habitat (and are you allowed under case law to delist isolated segments of a population listed as a single entity under the ESA? I do not think so!), and with a mortality rate of 10% in 2015, it appears to me that the Rule now open to comment is sorely lacking the kind of high level and THOROUGH analysis addressing these issues and more that is deserved by this iconic creature. Too much is at stake. Please consider re-opening your review and include a panel of independent, qualified scientists who are working separately from current grizzly research in the GYE.	FWS-R6-ES-2016-0042-4277	

2. USFWS cannot proceed in simultaneously designating the GYE population of grizzly bears as a "distinct population segment" (DPS) under the ESA while also delisting the newly created entity. See 81 Fed. Reg. 13,190; and Humane Soc'y of the United States v. Jewell, 76 F. Supp. 3d 69 (D.D.C. 2014). USFWS may "respectfully disagree[s]" with the court's analysis and interpretation of the agency's DPS policy in Humane Society, 81 Fed. Reg. 13,190, but it cannot ignore the law as it currently stands.	104			Data doubts and comments on process	Thank you for the opportunity to comment on the U.S. Fish and Wildlife Service's (USFWS) proposed rule to remove the Greater Yellowstone Ecosystem (GYE) population of grizzly bears from the federal list of endangered and threatened wildlife (81 Fed. Reg. 13,174 (Mar. 11, 2016)). 1. The proposed delisting rule is premature. Grizzly bears currently occupy less than 1% of their former range and represent only 1% of the pre-European population. The ESA requires that adequate regulatory mechanisms be in place before removing a protected species from the list of endangered and threatened wildlife. 15 U.S.C. 1533 (c); 50 C.F.R. 424.11. These measures ensure continued recovery for the species after federal ESA protections are removed. The proposed rule depends on a conservation strategy and state management plans that do not exist in final form yet. 81 Fed. Reg. at 13,189. 2. USFWS cannot proceed in simultaneously designating the GYE population of grizzly bears as a "distinct population segment" (DPS) under the ESA while also delisting the newly created entity. See 81 Fed. Reg. 13,190; and Humane Soc'y of the United States v. Jewell, 76 F. Supp. 3d 69 (D.D.C. 2014). USFWS may "respectfully disagree[s]" with the court's analysis and interpretation of the agency's DPS policy in Humane Society, 81 Fed. Reg. 13,190, but it cannot ignore the law as it currently stands. 3. The impacts of climate change, loss of vital food sources and the lack of connectivity to other grizzly bear populations in the lower 48 states seriously jeopardize the recovery of grizzly bears in the GYE. USFWS will undermine the recovery of the species as a whole by prematurely removing the federal protections that allowed the GYE population to make a comeback in the first place. 4. USFWS notes repeatedly throughout the proposed rule that the primary threat facing grizzly bears since their listing (and before) is human-caused mortality. See e.g., 81 Fed. Reg. 13,178; 13,187; 13,200. Yet, the proposed rule provides provisions for state-regulated trophy hunts to occur as soon as the rule is finalized. This makes no sense. Hostile state management focused on trophy hunting and removal of bears that attempt to disperse out of the GYE could quickly reverse population gains and eliminate any possibility of connectivity between bear populations. Last year, the GYE population experienced record-high mortality levels with 59 deaths, 54 of which were likely human-caused. IGBST Mortality Database (2015). Allowing the dramatic increase in mortality that hunting will most likely bring to this population will directly reverse recovery efforts from nearing success to beginning recovery efforts all over again. 5. Before delisting, conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat. I urge you to reconsider. Do not delist Grizzly Bears. 1. The proposed rule does not address protecting grizzly habit outside the conservation area when in fact more than half spend their time in this area. 2. Proposal does not reflect that there is a direct correlation between loss of pine bark as a food source and that bears will not find another alternative. 3. Proposal does address the far reaching effects of climate change on the bear's denning habits. 4. Trophy hunting will take prime grizzlies from their latest offspring causing a devastating effect on future generations. 5. Proposal did not address the problem of genetic isolation if grizzlies are not allowed to roam outside of the conservation area.	FWS-R6-ES-2016-0042-4336	
The proposed rule does not address protecting grizzly habit outside the conservation area when in fact more than half spend their time in this area.	100			Data doubts and comments on process	Do not delist Grizzly Bears. 1. The proposed rule does not address protecting grizzly habit outside the conservation area when in fact more than half spend their time in this area. 2. Proposal does not reflect that there is a direct correlation between loss of pine bark as a food source and that bears will not find another alternative. 3. Proposal does address the far reaching effects of climate change on the bear's denning habits. 4. Trophy hunting will take prime grizzlies from their latest offspring causing a devastating effect on future generations. 5. Proposal did not address the problem of genetic isolation if grizzlies are not allowed to roam outside of the conservation area.	FWS-R6-ES-2016-0042-4363	
EXPERTS OPPOSE REMOVING GRIZZLIES FROM THE ENDANGERED SPECIES LIST. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted. Â	100			Data doubts and comments on process	#NAME?	FWS-R6-ES-2016-0042-4274	

David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the x FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." Å	102			Data doubts and comments on process	I would like to enter the following comments about the proposed delisting of the Yellowstone Grizzly: YOUR CLAIM IS THAT there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. YET IN REALITY: no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." YOUR CLAIM IS THAT the shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. YET THE REALITY IS: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. YOUR CLAIM IS THAT your agency will stay involved with protecting the grizzly population after delisting. YET THE REALITY IS: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. YOUR CLAIM IS THAT: Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. YET THE REALITY IS THAT:This approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. = = = = = SPECIAL OBJECTIONS!!! = = = = = = = = = = YOUR CLAIM IS THAT: your agency looks forward to hearing from the public about delisting. YET THE REALITY IS: A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS	FWS-R6-ES-2016-0042-4382	
USFWS's proposal x does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. Å	103			Data doubts and comments on process	I am opposed to the delisting of grizzly bears. A few of the reasons but not even close to all of the reasons are as follows: **The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. **The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. **The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). There is no reason to trophy hunt - it serves the interest of a tiny portion of the population who want to make rugs from these iconic species that are part of our American heritage. **USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. **What's the Rush? There are too many unknowns right now, regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population. Why not wait five years to see how the population is responding to these threats?	FWS-R6-ES-2016-0042-4569	

Finally, we believe the wish on the part of U.S. Fish and Wildlife Services to delist the Yellowstone grizzly could well be due to politics, not science. It is well known that the current director, Dan Ashe, is no friend of endangered and threatened species. He has been hostile to wolf recovery, listing the obviously threatened sage grouse, and is willing to allow wind farms' collateral kill of bald eagles to increase from 1000 to 4000 annually.	102			Data doubts and comments on process	May 9, 2016 The Portneuf Valley Audubon Society is opposed to delisting the Yellowstone grizzly from the Federal List of Endangered and Threatened Wildlife for the following reasons: 1.) We do not trust the states to do a good job. Wyoming has done so badly with wolves that a federal judge took management away from them. Idaho Fish and Game sneaked a hunter into the Frank Church-River of No Return Wilderness to kill wolves because they felt the wolves were taking too many elk in the Chambelain Basin. This was done without public knowledge or input. The state fish and game agencies are under constant pressure to kill predators from state politicians who oppose their protection and wish to see them eradicated. Grizzlies, and largest and most charismatic of western omnivores, would certainly be no exception. 2.) There is not strong evidence that the Yellowstone grizzly has recovered. The U.S. Fish and Wildlife Service claims that the bears are recovered because they are dispersing out of Yellowstone National Park and the primary conversation area. However, they could well be moving out of the area because of lack of food. Their primary protein source, the cutthroat trout, is gone from Yellowstone Lake and related spawning streams because of the lake trout. Other food sources like the whitebark pine nut stands are also failing. Stand that are still viable are outside of the park and in areas where the grizzlies would be hunted and killed. Since 2003 there have been approximately 700 grizzlies reported in the Greater Yellowstone Ecosystem. Numbers for 2015 are 717. These numbers do not suggest recovery but simply the same number of bears over 12 years, give or take, and these bears are dispersing. If they were leaving because of increased population, not lack of food, we would expect to see an increase in the number of bears. This has not happened. 3.) Finally, we believe the wish on the part of U.S. Fish and Wildlife Services to delist the Yellowstone grizzly could well be due to politics, not science. It is well known that the current director, Dan Ashe, is no friend of endangered and threatened species. He has been hostile to wolf recovery, listing the obviously threatened sage grouse, and is willing to allow wind farms' collateral kill of bald eagles to increase from 1000 to 4000 annually. For these reasons we oppose delisting the Yellowstone grizzly. It is obvious the bears are a favorite with the public and we fear, with good reason, that the states of Wyoming and Idaho will do their best to kill them once federal protection is removed. Jackie Johnson Mauaghan, treasurer	FWS-R6-ES-2016-0042-4648	
â€œ Delisting process: What could have potentially been a celebration of conservation success for the grizzly bear has been rendered an empty victory due to the hasty, disorganized, secretive, and incomplete nature of the delisting process. Those citizens who want to believe that the Federal and State management partners are acting for the long-term benefit of the grizzly bear are instead disillusioned by the lack of communication and organization between the various entities. It can only be surmised that artificial deadlines due to political considerations have trumped what should be a careful and deliberate process.	100			Data doubts and comments on process	See attached file(s) Attachments JSchmitt_Proposed Rule comments_2016	FWS-R6-ES-2016-0042-4727	
If you're going to delist Grizzlies, it should be based on sound science. It is not. USFWS claims there are 700 bears in the Greater Yellowstone ecosystem, but that's a guess that is challenged by researchers that have worked with them for 20 years.	102			Data doubts and comments on process	If you're going to delist Grizzlies, it should be based on sound science. It is not. USFWS claims there are 700 bears in the Greater Yellowstone ecosystem, but that's a guess that is challenged by researchers that have worked with them for 20 years. There are several factors that are threatening the survival of grizzlies - among them the loss of the cutthroat trout and the whitebark pine beetle. If these critically important food sources collapse, the grizzlies will be in trouble. Grizzlies reproduce slowly. Cubs are with their mothers for three years. Although the state plans will no doubt take this into account, there has not been any serious attempt at penalizing poor judgement or vision on the part of hunters. As we have seen with wolves we have a "Oh golly gee I thought it was a coyote" attitude and NO penalties. Grizzlies cannot withstand that kind of assault.	FWS-R6-ES-2016-0042-4776	

EXPERTS OPPOSE REMOVING GRIZZLIES FROM THE ENDANGERED SPECIES LIST. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted. Â - THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. Â Â	103			Data doubts and comments on process	There are several reasons to not delist the Grizzly Bear: The proposed rule does not address genetic isolation of the bears. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - Declining food sources. Historically bears dependent on 4 food sources - 2 of which (whitebark pine and cutthroat trout) are disappearing and moths, their third main food source, are unreliable food source due to pesticides. - Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. - Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. - Grizzlies occupy only 1% of their historic range. - Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. - If hunting is allowed, there should be a 5-year moratorium on hunting until states can prove that they can manage the grizzly population effectively. - If hunting is allowed, there must be buffer zones around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park. - DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states known for their hatred and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and most Americans (55%) oppose delisting. Even more Americans (68%) oppose hunting of grizzly bears if delisted. - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to less food sources for grizzlies, it is not a good idea to remove the Greater Yellowstone Ecosystem Population from the Federal List of Endangered and Threatened Wildlife. Also, even though the population is slowly growing, less than a thousand bears is not many animals. Also, the states of Wyoming, Idaho and Montana are not protecting their wild ruminant populations very well, and most are declining because of failure of the breeding age females to have viable young that survive to adulthood. A very high prevalence of newborns have developmental malformations/birth defects. Any state that allows over 50% of some wild animal populations to be born with birth defects without doing something to find and mitigate the cause can't be trusted to protect predators, especially grizzlies and wolves. They even claim the wolves and grizzlies kill so many ruminant young that it causes population declines in the wild ruminant populations rather than trying to do something about the real cause of the declining ruminant populations. This is being less than truthful. It is actually the birth defects that either kill the newborn ruminants outright or make them much more susceptible to being caught by predators that are causing the low recruitment rates. I have seen no mention of the birth defects and adverse health issues on the ruminant newborns in the discussions concerning delisting of the grizzly. Has the USFWS done anything to mitigate the birth defects? If there are fewer and fewer large grazing animals for the grizzlies to eat, as well as no white-bark pine nuts or trout, it will definitely adversely affect the grizzly population and its ability to grow. The state game departments have completely ignored studies concerning the birth defects on ruminants and have consistently ignored all reports of birth defects on birds, mammals and amphibians. The agriculture departments have ignored the birth defects and health issues on domestic livestock that kill thousands each year and again the wild predators often are blamed. Since so many animals, including wolves have similar birth defects, it is possible that grizzlies also do. You should make certain that the grizzly cubs are not being similarly affected before even considering delisting. Human newborns have the same or similar birth defects and these serious health issues are increasing each year, so there is no reason to just assume that grizzly cubs are not being affected. Grizzlies eat foliage, like ruminants and they eat fruit, tubulars and meat, just like humans. Have you addressed this issue at all before recommending delisting? I am adamantly opposed to delisting the grizzly anywhere until all issues that may affect the grizzly populations are addressed, especially the issue of high prevalences of developmental malformations on newborns.				
The state game departments have completely ignored studies concerning the birth defects on ruminants and have consistently ignored all reports of birth defects on birds, mammals and amphibians. The agriculture departments have ignored the birth defects and health issues on domestic livestock that kill thousands each year and again the wild predators often are blamed. Since so many animals, including wolves have similar birth defects, it is possible that grizzlies also do. You should make certain that the grizzly cubs are not being similarly affected before even considering delisting. Human newborns have the same or similar birth defects and these serious health issues are increasing each year, so there is no reason to just assume that grizzly cubs are not being affected. Grizzlies eat foliage, like ruminants and they eat fruit, tubulars and meat, just like humans. Have you addressed this issue at all before recommending delisting? I am adamantly opposed to delisting the grizzly anywhere until all issues that may affect the grizzly populations are addressed, especially the issue of high prevalences of developmental malformations on newborns.	102	103	101	Data doubts and comments on process	With less food sources for grizzlies, it is not a good idea to remove the Greater Yellowstone Ecosystem Population from the Federal List of Endangered and Threatened Wildlife. Also, even though the population is slowly growing, less than a thousand bears is not many animals. Also, the states of Wyoming, Idaho and Montana are not protecting their wild ruminant populations very well, and most are declining because of failure of the breeding age females to have viable young that survive to adulthood. A very high prevalence of newborns have developmental malformations/birth defects. Any state that allows over 50% of some wild animal populations to be born with birth defects without doing something to find and mitigate the cause can't be trusted to protect predators, especially grizzlies and wolves. They even claim the wolves and grizzlies kill so many ruminant young that it causes population declines in the wild ruminant populations rather than trying to do something about the real cause of the declining ruminant populations. This is being less than truthful. It is actually the birth defects that either kill the newborn ruminants outright or make them much more susceptible to being caught by predators that are causing the low recruitment rates. I have seen no mention of the birth defects and adverse health issues on the ruminant newborns in the discussions concerning delisting of the grizzly. Has the USFWS done anything to mitigate the birth defects? If there are fewer and fewer large grazing animals for the grizzlies to eat, as well as no white-bark pine nuts or trout, it will definitely adversely affect the grizzly population and its ability to grow. The state game departments have completely ignored studies concerning the birth defects on ruminants and have consistently ignored all reports of birth defects on birds, mammals and amphibians. The agriculture departments have ignored the birth defects and health issues on domestic livestock that kill thousands each year and again the wild predators often are blamed. Since so many animals, including wolves have similar birth defects, it is possible that grizzlies also do. You should make certain that the grizzly cubs are not being similarly affected before even considering delisting. Human newborns have the same or similar birth defects and these serious health issues are increasing each year, so there is no reason to just assume that grizzly cubs are not being affected. Grizzlies eat foliage, like ruminants and they eat fruit, tubulars and meat, just like humans. Have you addressed this issue at all before recommending delisting? I am adamantly opposed to delisting the grizzly anywhere until all issues that may affect the grizzly populations are addressed, especially the issue of high prevalences of developmental malformations on newborns. See the links to the studies below: 2002 study: &lt;http://www.ncbi.nlm.nih.gov/pubmed/12602857&gt; 2011 study: doi:10.2461/wbp.2011.7.13 2015 study: &lt;http://dx.doi.org/10.4172/2375-446X.1000132&et= Thank you for your consideration of this				

I want to express my severe disappointment that a public hearing was not held in Jackson, WY, as this city is in the heart of the DMA. It would appear that FWS deliberately chose NOT to hold a hearing at this location when it is surrounded by grizzly country, many of the residents rely on the Yellowstone grizzlies for economic means from tourism, and residents have vested interest in the issue of delisting. The public comment period of 60 days is inadequate for a comprehensive public response, especially since the state management plans for Idaho and Montana have not been released. This transparency issue does not give the public a chance to be informed to the fullest extent possible. Citizens CANNOT make informed decisions based on partial information. FWS is proposing delisting, but when the public is asked to comment without the full knowledge of state management plans â€œ essentially the fate of the grizzlies- suggests political motivations for delisting instead of sound, scientific reasoning. Release of the ID and MT state management plans, adequate time to comment on those drafts, and an extension of the public comment period for the FWS proposal beyond those comment periods of the ID and MT management plans is essential for a fair and informed commenting process.		105		Data doubts and comments on process	Please see attachment. Attachments FWS comment	FWS-R6-ES-2016-0042-4891	
Furthermore, the increase in population is still unstable, and far more data is needed before bear stability can be proven to the point of de-listing.	102	103		Data doubts and comments on process	Please do not take the yellowstone grizzly off of the endangered species list. Despite the claims from trophy hunters and other groups that the bear population needs to be cut due to increased interaction with humans, etc, there are better ways of handling population control. Furthermore, the increase in population is still unstable, and far more data is needed before bear stability can be proven to the point of de-listing. These bears are one of the primary reasons folks still protect and care for Yellowstone national park. And places like Yellowstone are some of the few remaining places for these magnificent creatures. Please do not compromise the safety of the bear populations by de-listing them.	FWS-R6-ES-2016-0042-4881	
I am concerned that FWS is using 1998 as a baseline, as this is before the WBP epidemic. Grizzly numbers may have been rising and the ecosystem able to support a growing population in 1998, however the GYE now has many stressors that were not as prevalent as in 1998. Climate change, blister rust, and pine beetles have decimated WBP populations. In the previous proposal of the 2007 delisting of grizzlies, WBP was stated as one of four important food sources. FWS lost its appeal in the Ninth Circuit Court in 2011 because the Service was found to be arbitrary and capricious in its consideration of grizzliesâ€™ use of WBP. In the current proposal, FWS merely claims WBP â€œcanâ€™ be an important food source, and the research used to support this claim is not comprehensive in consideration to climate change and epidemics, making the argument once again arbitrary and capricious. The current rule glosses over and deemphasizes the role WBP has in a GYE grizzlyâ€™s diet to serve as a base for delisting. The Servicesâ€™ research found grizzly bearsâ€™ selection of WBP seeds has declined since 2000, coinciding with WBP population declines reaching epidemic proportions, but the agency fails to acknowledge the likely causal connection of stark and rapid declines of WBP populations being a limiting factor for grizzly bears using it as a food source. The proposal states one-third of grizzly bears do not have WBP in their home range, but does not elaborate to clarify if a lack of WBP is because WBP does not grow in	101	102	103	Data doubts and comments on process	Please see attachment. Attachments FWS comment	FWS-R6-ES-2016-0042-4891	

Yellowstone grizzlies are isolated from other populations yet the proposed rule does not sufficiently address this. Rather, USFWS improperly relies on non-binding "assurances" from Montana to "limit mortality" in potential linkage zones. How is this enough? The plan should be revised to offer additional avenues to connect Yellowstone's population with grizzlies in the north, thereby ensuring longterm survival of the species. Further, the proposed rule improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001).	101	102		Data doubts and comments on process	I oppose delisting of Greater Yellowstone Ecosystem grizzly bears. First, the proposed rule fails to adequately protect habitat outside of the Primary Conservation Area (PCA). Why? As many as half of Yellowstone's grizzly bears spend time outside of the PCA. Rather, the proposed rule should require continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. Next, Yellowstone grizzlies are isolated from other populations yet the proposed rule does not sufficiently address this. Rather, USFWS improperly relies on non-binding "assurances" from Montana to "limit mortality" in potential linkage zones. How is this enough? The plan should be revised to offer additional avenues to connect Yellowstone's population with grizzlies in the north, thereby ensuring longterm survival of the species. Further, the proposed rule improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). Finally, what is the rush? With so many unknowns (stagnant population, changing climate, depleted food sources), why not delay this proposal for 5 years. It feels premature and insufficient.	FWS-R6-ES-2016-0042-4949	
Seriously, grizzly bear habitats and their continued management, preservation and conservation for grizzly bears in the states of ID, MT, and WY on federally managed public lands and national forests have NOT been well coordinated, adequate, legally binding, or secured before this delisting proposal was made. Therefore, this proposal should be stopped immediately.	104			Data doubts and comments on process	As a wildlife biologist, I have worked with several USFWS Threatened and Endangered Species over the past 30 years, with several federal land management agencies. I absolutely disagree with the USFWS's totally premature and significantly and inadequately designed and planned proposal to delist the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Threatened Species Protections of the Endangered Species Act which the grizzly bears have been under for the last 40 years for these several important reasons. 1. While the numbers of grizzly bears in GYE are up since the low in the late 1970s and early 1980s, this has taken more than three decades of significant and serious legally established protections and considerable conservation efforts on many different levels. The delisting of GYE grizzly bears now, during increasing Climate Change uncertainty and scientifically accepted understanding of changing or reduced grizzly bear habitats including food, water and shelter resources would absolutely reduce the GYE grizzly bear population (likely other lower 48 grizzly bears and their populations too), and their conservation efforts and funding, which would definitely and significantly compromise the viability of these GYE grizzly bears in both the short-term, and the long-term for America's Future generations. All the important and comprehensive grizzly bear conservation measures must be established and in place before delisting proposal is considered, including all the funding, ecological, scientific, social, and economic issues and concerns. Unfortunately, none of these important conservation measures, issues, and concerns are adequately addressed yet, so this grizzly delisting proposal must not continue. 2. Unfortunately, after delisting, the likely legal hunting of grizzly bears in the states of ID, MT, and WY, would NOT be responsible or reasonable for the GYE grizzly bear population to continue to be healthy and viable. Also, unfortunately, the illegal killing of grizzly bears would significantly rise, especially with little or no funding, efforts or motivation to prosecute violations of important wildlife regulations. I am absolutely against any legal hunting of grizzly bears in the lower 48 contiguous United States for many responsible reasons, and especially for the hunting of grizzly bears would definitely be damaging to grizzly bear conservation and the GYE grizzly bear population would be significantly reduced. Any consideration or allowance of legal grizzly bear hunting in any state at anytime in the future must absolutely be denied before proposal is reasonable, responsible, or expectable. 3. Absolutely, important comprehensive Grizzly Bear Habitats on federal, state and local lands in all the appropriate NW States must be established and well coordinated first, before any delisting proposal should be considered. Seriously, grizzly bear habitats and their continued management, preservation and conservation for grizzly bears in the states of ID, MT, and WY on federally managed public lands and national forests have NOT been well coordinated, adequate	FWS-R6-ES-2016-0042-5460	

I am very concerned about the FWS proposal to delist the grizzly bear. I do not feel that FWS has provided adequate information for an educated decision on the delisting. Jackson WY was an obvious location for a public hearing. I am very curious as to why FWS did not allow the citizens located in the middle of grizzly bear country to have a forum for discussion on such an important topic. A 60 day comment period is just too short of a timeframe to gather a comprehensive look at public opinion. By disregarding obvious locations and limiting input time, FWS seems to be trying to skew the decision in their favor.	105			Data doubts and comments on process	I am very concerned about the FWS proposal to delist the grizzly bear. I do not feel that FWS has provided adequate information for an educated decision on the delisting. Jackson WY was an obvious location for a public hearing. I am very curious as to why FWS did not allow the citizens located in the middle of grizzly bear country to have a forum for discussion on such an important topic. A 60 day comment period is just too short of a timeframe to gather a comprehensive look at public opinion. By disregarding obvious locations and limiting input time, FWS seems to be trying to skew the decision in their favor. Another issue is the fact that Montana and Idaho have not published their state management plans. Where are they? Is anyone working on them? As a Montana resident it is essential for me to know and understand the plan before I can form an educated opinion on delisting the grizzly. FWS has not taken into account the effects of climate change on the grizzly's food sources and habitat. Grizzlies can adapt to changing food sources and availability, but FWS has failed to provide conclusive research to show that the bears can adapt quickly enough to keep up with the increased rate of change. Specifically, the diminished habitat for the army cutworm moth, threatened cutthroat trout populations, and the decimation of the white bark pine due to blister rust and pine beetles. The research /data that has been presented is insufficient in duration. Before delisting can be considered, comprehensive studies over a longer period of time will need to be carried out. More time will give biologists and the public correct information on food source sustainability. Other data presented by FWS said that bison were not a significant source of food. Research was done in the Yellowstone Lake area where there are few bison, but what about Lamar Valley where bison are plentiful? Once again this data is skewed and insufficient. FWS reasons for delisting lacks plausibility because of the lack of research carried out over a sufficient amount of time and data on too small of a population to be generalized. I will not support delisting when FWS has not taken climate change, diminished food supply, and threatened habitat fully into account. Lack of published state plans, a short comment period, and poor public hearing site choices makes me wonder if FWS is bowing to political pressure to push the delisting through for specific interest groups. The grizzly bears should be allowed to thrive, not just maintain an existence.	FWS-R6-ES-2016-0042-5552	
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Politics vs Science It appears as though current grizzly bear population estimates in the GYE are made with political expediency in mind. For example, Idaho Fish and Game claim the GYE grizzly population exceeds 1,000 bears while the USFWS claims about 760 bears currently reside in the GYE. This amounts to a 24% disparity between agencies. This , of course, does not meet scientific scrutiny .	102	101		Data doubts and comments on process	I oppose the delisting of ursus arctos horribilis in the GYE ecosystem by the USFWS for some of the following reasons: 1. Politics vs Science It appears as though current grizzly bear population estimates in the GYE are made with political expediency in mind. For example, Idaho Fish and Game claim the GYE grizzly population exceeds 1,000 bears while the USFWS claims about 760 bears currently reside in the GYE. This amounts to a 24% disparity between agencies. This , of course, does not meet scientific scrutiny . 2. I would like to see cross scientific methods used to establish the current population in the GYE in order to improve the accuracy of the count. Use a DNA rub study in conjunction with radio collaring , field observation and spatial habitat modeling and analysis as was done in the NCDE recently. I know that there were overtures made to the IGBST to conduct a DNA rub analysis in the GYE a few years back which was meant with vehement resistance. 3. Historically, the states of Wyoming, Montana and especially Idaho have done a very poor job in protecting this iconic species. Before the ESA was enacted and implemented in 1974 , the grizzly bear population in the GYE was under 200 and certainly headed towards extirpation without the timely intervention and sound recovery plan of the USFWS. If delisting occurs, what's to prevent the states involved from botching the current success achieved by the federal agency. 4. Knowing that the grizzly has one of the lowest reproductive rates and a cub of the year mortality rate of 50% , there is very little room for error. 5. Why can't the USFWS place more resources towards colonization by grizzlies into all suitable habitat within the GYE, primarily working on reducing human-bear conflicts in areas where bears have not existed for the past 50+ years? Again, I would delay delisting until a viable population is established in the Bitterroot- Selway ecosystem in west central Idaho either through natural immigration or translocation.	FWS-R6-ES-2016-0042-5574	

A)Prior to the recent proposal of delisting the GYE grizzly, the park officials including bear biologists were unable to put a finite number on the grizzly bears. How could they possibly get a definitive number on an 18 million acre area especially when male bears are able to sustain a 1000 square mile roaming territory? We were always told 'around 300-600' for years and years and about the same for black bears (which populations haven't been studied recently at all). All of a sudden there is a definitive number being thrown out there which coincidentally corresponds with the proposed delisting. More research needs to be done to ensure this number is in fact accurate.	102	103	101	Data doubts and comments on process	Please reconsider your decision of delisting the GYE grizzly bear. Some of the key ideas that need to be reviewed include 1)the population count uncertainties, 2)the ever-changing climate and the affects on key food sources like white bark pine and army cutworm moths, 3)the decline of westslope and yellowstone cutthroat trout (another key food source) due to the nonnative fish introduced into Yellowstone, 4)the future elk population uncertainty as more calves are being consumed by bears to replace other depleted food sources, long term drought and declining snowpack nurturing vegetation and a continued hunting economy outside park borders, 5)the conditioned behavior of grizzly bears to humans under protection which will allow their population to drastically decline once the protection is removed. A)Prior to the recent proposal of delisting the GYE grizzly, the park officials including bear biologists were unable to put a finite number on the grizzly bears. How could they possibly get a definitive number on an 18 million acre area especially when male bears are able to sustain a 1000 square mile roaming territory? We were always told 'around 300-600' for years and years and about the same for black bears (which populations haven't been studied recently at all). All of a sudden there is a definitive number being thrown out there which coincidentally corresponds with the proposed delisting. More research needs to be done to ensure this number is in fact accurate. As we know grizzly bears have such a slow reproduction rate, that if this proposed removal of protection does in fact crash the population they may or may not be able to recover as they did once before. Especially taking into consideration the habitat loss outside the park, increased development and mining, fracking, road building, all of these may not provide the needed habitat that once helped the bears recover. To make a decision based on these facts is premature. Why the rush to a decision when the facts are gray at the least. B)Yes bears have a very diverse diet and can somewhat adapt to the changing environment, it is known that NO food source can replace the caloric content of the white bark pine who are functionally extinct in some areas and with the current trend of future warming climates at high altitudes, this will most likely not allow the white bark pines to make a comeback. Army cutworm moths (another key food source) may not be a dependable food source either, as pesticides affect them in the fields of Kansas and the upper altitude environments may not be suitable in the future with warming temperatures. C)Elk calves have increasingly been consumed by bears in the early summer months, which while great for the bears does add to the overall uncertainty of this key food source as well. Long term drought and natural wolf predation has brought the population into a range of equilibrium, but with the sustained aggressive hunting economy outside the park, the declining snowpack that may not provide as nurturing of vegetation and the bears themselves increasing	FWS-R6-ES-2016-0042-5566	
The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agencyviolated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public.	102			Data doubts and comments on process	I am opposed to the de-listing of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public.	FWS-R6-ES-2016-0042-5584	
I would like to see cross scientific methods used to establish the current population in the GYE in order to improve the accuracy of the count. Use a DNA rub study in conjunction with radio collaring , field observation and spatial habitat modeling and analysis as was done in the NCDE recently. I know that there were overtures made to the IGBST to conduct a DNA rub analysis in the GYE a few years back which was meant with vehement resistance.	101	102	103	Data doubts and comments on process	I oppose the delisting of ursus arctos horribilis in the GYE ecosystem by the USFWS for some of the following reasons: 1. Politics vs Science It appears as though current grizzly bear population estimates in the GYE are made with political expediency in mind. For example, Idaho Fish and Game claim the GYE grizzly population exceeds 1,000 bears while the USFWS claims about 760 bears currently reside in the GYE. This amounts to a 24% disparity between agencies. This , of course, does not meet scientific scrutiny . 2. I would like to see cross scientific methods used to establish the current population in the GYE in order to improve the accuracy of the count. Use a DNA rub study in conjunction with radio collaring , field observation and spatial habitat modeling and analysis as was done in the NCDE recently. I know that there were overtures made to the IGBST to conduct a DNA rub analysis in the GYE a few years back which was meant with vehement resistance. 3. Historically, the states of Wyoming, Montana and especially Idaho have done a very poor job in protecting this iconic species. Before the ESA was enacted and implemented in 1974 , the grizzly bear population in the GYE was under 200 and certainly headed towards extirpation without the timely intervention and sound recovery plan of the USFWS. If delisting occurs, what's to prevent the states involved from botching the current success achieved by the federal agency. 4. Knowing that the grizzly has one of the lowest reproductive rates and a cub of the year mortality rate of 50% , there is very little room for error. 5. Why can't the USFWS place more resources towards colonization by grizzlies into all suitable habitat within the GYE, primarily working on reducing human-bear conflicts in areas where bears have not existed for the past 50+ years? Again, I would delay delisting until a viable population is established in the Bitterroot- Selway ecosystem in west central Idaho either through natural immigration or translocation.	FWS-R6-ES-2016-0042-5574	

Nothing appears to me more ill conceived that this de-listing which would put a blanket of death over the bear. It would make more sense to allow a hunt or two in particular areas that could be well-studied to evaluate the consequences. When other species have been delisted - to the exception of the wolf, another sad case - the protected species have been allowed to flourish and benefit from the protections long term. Only if and when we would have enough grizzly bears that would exceed the carrying capacity of certain areas would partial de-listing make sense. Large predators like the grizzly make good sense for ecosystems. Science is clear about this. And large predators like the grizzly prevent other damages to vegetation and ecosystems by keeping tabs on other species.	102			Data doubts and comments on process	As a botanist and a long time observer of healthy ecosystems I would like to comment against the de-listing of the grizzly bear. Main concerns of mine are, first of all, the hunting spree that this de-listing will unleash. The bear is already under severe threats because of the dwindling food resources, and reduced habitat. Increased logging, vegetation clearing, new and out of control insect pests associated with climate change and climate change itself have already placed it under fire. We should be working desperately to hang on to these iconic species that, were they to disappear would leave us incredibly diminished and not planning their demise. Another huge concern is the invasion of wilderness lands by hunters set on finding these bears. Very little much is known about the genetics or reduced fitness since listing. Little is known about the necessary density for successful long term recovery. Nothing appears to me more ill conceived that this de-listing which would put a blanket of death over the bear. It would make more sense to allow a hunt or two in particular areas that could be well-studied to evaluate the consequences. When other species have been delisted - to the exception of the wolf, another sad case - the protected species have been allowed to flourish and benefit from the protections long term. Only if and when we would have enough grizzly bears that would exceed the carrying capacity of certain areas would partial de-listing make sense. Large predators like the grizzly make good sense for ecosystems. Science is clear about this. And large predators like the grizzly prevent other damages to vegetation and ecosystems by keeping tabs on other species. I urge you not to allow the de-listing. We need our top beautiful grizzly bear to continue to recover protected by the ESA. Thank you very much for allowing me to comment.	FWS-R6-ES-2016-0042-5637	
Counting grizzlies in Yellowstone's wilderness is difficult, and the indirect indicators used by USFWS are unreliable and generate false results that increase the likelihood that the USFWS will inaccurately conclude that the population has grown, when, in truth, it has declined due to excessive numbers of deaths. Claims by the USFWS that the Yellowstone grizzly has grown at a high rate for several decades are NOT proven. Although some growth may have occurred, it is likely modest, and population decline is probably occurring NOW as a result of deteriorating habitat conditions. New methods being introduced by the USFWS are billed as an improvement, but will actually increase the risk of over-killing bears and mistakenly conclude that observed levels of death are "sustainable". A bad situation will almost certainly worsen if Yellowstone's grizzlies are delisted and resources are not available to maintain current levels of monitoring.	102	103	101	Data doubts and comments on process	I submit comments as a biologist and wildlife conservationist. Given the severity of threats facing Yellowstone's grizzly bears, I strongly urge you to NOT delist the population, renew sport hunting, and/or lessen habitat protections. The reasons to not delist follow. - Yellowstone's grizzly bear population is NOT recovered: It is completely isolated from other grizzly bear populations and very far from the 2000+ animals considered necessary for long-term viability; it's also only 2% of the 100,000 grizzly bears that once roamed the U.S. (in a range 100 times larger!). This magnificent animal's imperilment comes from too many people collectively causing permanent habitat degradation and fragmentation (such as increasing human infrastructure, energy development, problematic livestock husbandry practices, climate change, poor state management, persecution, and questionable methods of monitoring the grizzly's status). - Yellowstone's grizzly bears have lost critically important forage that previously had positive effects on their reproductive success. Since the early 2000s much of their food resources are depleted due to recently introduced non-native lake trout, a white pine fungal disease, a climate-driven outbreak of bark beetles, and a loss of army cutworm moth that are severely threatened by warming. There is no doubt that food resources of Yellowstone's grizzly bears have declined and put the population at grave risk, and more is on its way. - Grizzly bears have one of the lowest reproductive rates of any land mammal, and most cubs die before adulthood. The species also has difficulty colonizing new habitats, mainly because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates and can more easily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover! - State wildlife management agencies bend over backwards for "sport" hunters interested in killing wildlife, who view carnivores as competitors. Hunting accounts for 70-80% of all deaths of adult carnivores in the West. The public trust doctrine is often invoked by state wildlife agencies, but much abused in actual practice in a system that marginalizes and excludes stakeholders who value large carnivores intrinsically or for contributions to ecosystem health. Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals. - Counting grizzlies in Yellowstone's wilderness is difficult, and the indirect indicators used by USFWS are unreliable and generate false results that increase the likelihood that the USFWS will inaccurately conclude that the population has grown, when, in truth, it has declined due to excessive numbers of deaths. Claims by the USFWS that the Yellowstone grizzly has grown at	FWS-R6-ES-2016-0042-5647	

My conclusion that there is on biological evidence to support the belief that they should be delisted. Here's why:1) They need biological diversity. With hunting, they will be unable to reach other grizzly bear populations. 2) Some of their primary food sources are in decline due to global warming. This is an indisputable fact. 3) They have the lowest reproduction rate of any North American animal. If hunted, their numbers could be driven down past the point of recovery, because there is no reliable way to count them, especially by gender. Sows will be killed and cubs left to starve or be killed by predators or hunters. 4) They are an important factor in the Yellowstone ecosystem. To remove any of them would be a disservice! Additionally, grizzly bears bring thousands, if not millions, of people to Yellowstone each year. There is no reason why we can't live with the grizzly bears. People need to be responsible, so bears don't have to be killed or removed from the Greater Yellowstone Ecosystem. Over 50 were removed in 2015, mostly due to human negligence, even with protection. Without protection it would be a fiasco. Greed and the desire to mount a grizzly bear head on the wall is what I believe, is driving this decision to delist them. It has nothing to do with conservation. Turning the fate of the grizzly bear over to anti-carnivore states would be a disaster that could result in the demise of the grizzly bear. Many of these bears, especially sows with cubs have grown accustomed to humans and would be easy targets for	102	103	101	Data doubts and comments on process	I have read numerous opinions on the subject of delisting the grizzly bears. My conclusion that there is on biological evidence to support the belief that they should be delisted. Here's why: 1) They need biological diversity. With hunting, they will be unable to reach other grizzly bear populations. 2) Some of their primary food sources are in decline due to global warming. This is an indisputable fact. 3) They have the lowest reproduction rate of any North American animal. If hunted, their numbers could be driven down past the point of recovery, because there is no reliable way to count them, especially by gender. Sows will be killed and cubs left to starve or be killed by predators or hunters. 4) They are an important factor in the Yellowstone ecosystem. To remove any of them would be a disservice! Additionally, grizzly bears bring thousands, if not millions, of people to Yellowstone each year. There is no reason why we can't live with the grizzly bears. People need to be responsible, so bears don't have to be killed or removed from the Greater Yellowstone Ecosystem. Over 50 were removed in 2015, mostly due to human negligence, even with protection. Without protection it would be a fiasco. Greed and the desire to mount a grizzly bear head on the wall is what I believe, is driving this decision to delist them. It has nothing to do with conservation. Turning the fate of the grizzly bear over to anti-carnivore states would be a disaster that could result in the demise of the grizzly bear. Many of these bears, especially sows with cubs have grown accustomed to humans and would be easy targets for hunters. Allowing hunting in areas close to Yellowstone and Grand Teton parks would be a complete disaster and some of the states are even talking about allowing that. Some hunters are already targeting particular bears as soon as they are delisted. Please withdraw your request to delist the grizzly bears. These bears are an important part of the ecosystem and are loved by people who come to visit the area. We live in Montana and I know we can find a way to live with the grizzlies. We don't need to kill them.	FWS-R6-ES-2016-0042-0306	
There is currently no significant increase in grizzly bear populations, therefore it is premature to reintroduce hunting on them, as it may put them in another serious decline. Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions.	102			Data doubts and comments on process	I OPPOSE the delisting of Grizzly Bears on the following grounds: In order to ensure the long term survival of this isolated population and expand its gene pool, protected corridors to other regions need to be established. The grizzly bear is one of the slowest reproducing mammals on this continent, taking a minimum of 3 years to produce each offspring. There is currently no significant increase in grizzly bear populations, therefore it is premature to reintroduce hunting on them, as it may put them in another serious decline. Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions. There is a decline in the grizzly bear's primary food sources due to climate change, forcing bears to search further for their food. If no federal protections are in place, grizzlies would not be able to reach further vital food sources in Wyoming. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government, as is the case with Gray wolves.	FWS-R6-ES-2016-0042-0360	

Trigger Text					Code(s)	Full Comment Text	Form Letter/Document ID	Annotation Notes
Isolated populations of any species are doomed to eventual extinction due to lack of genetic diversity	301				Delisting	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Use the "preemption clause" of the U.S. Constitution to protect the iconic Yellowstone grizzly bears, overruling state and local laws that would put the grizzly bears at risk. Isolated populations of any species are doomed to eventual extinction due to lack of genetic diversity. The grizzly bears must be allowed to roam without risk to their lives. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities.					Delisting	Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities. Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 -- and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears. - - The plan presents a potentially tremendous setback. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - - Yellowstone's bears have also long been isolated from other bear populations, forcing the government to keep them on permanent life support by proposing to truck in bears to avoid health issues caused by inbreeding. This fact further highlights the need for recovering grizzlies in more places. - - I am asking the Service to maintain protections for Yellowstone grizzly bears. If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	

Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list.					Delisting	Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities. Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 -- and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears. - - The plan presents a potentially tremendous setback. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - - Yellowstone's bears have also long been isolated from other bear populations, forcing the government to keep them on permanent life support by proposing to truck in bears to avoid health issues caused by inbreeding. This fact further highlights the need for recovering grizzlies in more places. - - I am asking the Service to maintain protections for Yellowstone grizzly bears. If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
It appears to me that the primary mission of DFW is to assure that there are enough fish and wild animals to be killed. DFW also acts to further the interest of private groups. I know this from years of personal interactions with both state and federal fish and wildlife agencies. - - The federal government has used millions of our tax dollars to kill millions of native animals. In fact, The Sacramento Bee ran a three-part series of article which denominated the U.S. Fish and Wildlife as. "The Killing Agency"	303				Delisting	I am an attorney in Washington State and I am a former chairperson of the Washington State Bar Association's Animal Law Section. My comments are my own and do not represent the views of either the Bar Association or the Animal Law Section. - - I am very disappointed by the actions of Secretary Jewell and Director Ashe. Fish and wildlife agencies are no friends of wildlife. It appears to me that the primary mission of DFW is to assure that there are enough fish and wild animals to be killed. DFW also acts to further the interest of private groups. I know this from years of personal interactions with both state and federal fish and wildlife agencies. - - The federal government has used millions of our tax dollars to kill millions of native animals. In fact, The Sacramento Bee ran a three-part series of article which denominated the U.S. Fish and Wildlife as. "The Killing Agency". Although Fish and Wildlife has not yet reported its killing statistics for 2015, in 2014 it killed 2.5 million animals including 22,496 beavers, 322 wolves, 61,702 coyotes, 15,698 black-tailed prairie dogs, and 580 black bears, among others. I am both sickened and outraged that my tax dollars support Wildlife Services, a secretive federal program under the auspices of the Department of Agriculture, which uses the money to make killing fields of our public lands. - - And now DFW wants to eliminate federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. This serves only to benefit trophy hunters. As you are undoubtedly aware, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. I urge you to stop working to further the interests of hunting groups that care only about killing animals. I urge you to reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. When I was in law school I was taught that the role of government was to protect the public from the excesses of private businesses. This is no longer true. - - I am sure you are familiar with recent polls that show public confidence in the government and its agencies has seriously declined. Actions such as your attempt to remove protections for Yellowstone grizzly bears only adds to public suspicion about the	CBD	

If we don't make the protection of bears a priority, we may not get another chance. Even the most conservative estimates are predicting a 75% loss of animal species within the span of 3 human lifetimes (see US News and World Report, 6/19/15, "75% of Animal Species to be Wiped Out in Sixth Mass Extinction")! The best thing you could do is connect the isolated bears of Yellowstone with corridors to other bear populations.	301				Delisting	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - If we don't make the protection of bears a priority, we may not get another chance. Even the most conservative estimates are predicting a 75% loss of animal species within the span of 3 human lifetimes (see US News and World Report, 6/19/15, "75% of Animal Species to be Wiped Out in Sixth Mass Extinction")! The best thing you could do is connect the isolated bears of Yellowstone with corridors to other bear populations. It would be a crime against nature and humanity to allow hunters or ranchers to kill any of the magnificent Grizzlies struggling to survive. Every bear is important to maintain a healthy, genetically diverse population. Also, a - small population of bears has little chance to adapt to a quickly changing environment and declines in their traditional food sources. - Sincerely,	CBD	
I absolutely support federal protection for grizzly bears (in the Greater Yellowstone Ecosystem and elsewhere). Climate crisis is upon us and there are so many pressures on bears and other species. Harvard biologist Dr. E.O. Wilson recently wrote a book ("Half-Earth") stating humankind must fully protect (preserve, set aside, leave alone) half of our planet if we are to preserve critical biodiversity. I recommend it. - - Although Dr. Wilson did not specifically address the Yellowstone ecosystem and the creatures within it, I believe places like Yellowstone should be included in such set-asides - and the bears and other creatures in them protected.	302				Delisting	I perviously commented at length on this proposal through the Greater Yellowstone Coalition but am not sure if those comments were directed to you or other entities. In a nutshell, I absolutely support federal protection for grizzly bears (in the Greater Yellowstone Ecosystem and elsewhere). Climate crisis is upon us and there are so many pressures on bears and other species. Harvard biologist Dr. E.O. Wilson recently wrote a book ("Half-Earth") stating humankind must fully protect (preserve, set aside, leave alone) half of our planet if we are to preserve critical biodiversity. I recommend it. - - Although Dr. Wilson did not specifically address the Yellowstone ecosystem and the creatures within it, I believe places like Yellowstone should be included in such set-asides - and the bears and other creatures in them protected. - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Thank you for your time and consideration. - - Sincerely,	CBD	

I have never heard of as many people intent on killing so many of our animal species, until recently. Perhaps the availability of rapid firing weapons has encouraged hunters and thus endanger our precious wildlife, driving more closer to extinction.	301	302			Delisting	I have never heard of as many people intent on killing so many of our animal species, until recently. Perhaps the availability of rapid firing weapons has encouraged hunters and thus endanger our precious wildlife, driving more closer to extinction. So I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
The FWS must maintain ESA protections for the Grizzly until humans stabilize the Earth's climate, and secure permanent protection of enough land in the Intermountain West for it it survive, free from the expropriation and dispossession of developers	301				Delisting	***The Grizzly Bear absolutely does not have a secure future. Every biologist familiar with this species understands it is deeply imperiled both by global warming and by the creeping development around the Greater Yellowstone Ecosystem. The FWS must maintain ESA protections for the Grizzly until humans stabilize the Earth's climate, and secure permanent protection of enough land in the Intermountain West for it it survive, free from the expropriation and dispossession of developers.*** - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	

If you do insist on delisting this endangered species, many more safeguards must be put forth in your plan so they don't suffer more at the hands of humans as they will always need conservation protection	301				Delisting	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€”they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. If you do insist on delisting this endangered species, many more safeguards must be put forth in your plan so they don't suffer more at the hands of humans as they will always need conservation protection. Grizzly bears are an iconic animal in Westâ€”they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	
They are essential, magnificent animals that deserve to be protected in their own right. Eliminating the delisting will ensure that this Endangered Species Act success story endures forever.	304				Delisting	Dear Director Ashe, As a biologist and conservationist, I am deeply concerned about the draft delisting rule. The conservation strategy falls very far short of what is needed to protect grizzlies and their habitat if federal protections are removed. I strongly urge you to stop the delisting. Their habitat protections and demographic standards are too limited in geographic scope and should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Additional protections should be instigated for bears and their habitat in areas that allow Yellowstone bears to connect to other bears. Any hunting of grizzlies should be permanently prohibited in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should always emphasize nonlethal techniques throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species that will always need protection from humans. They are essential, magnificent animals that deserve to be protected in their own right. Eliminating the delisting will ensure that this Endangered Species Act success story endures forever. Thank you. Sincerely,	Endangered Species Coalition	

Grizzly bears are an iconic animal in Westâ€they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan and conservation strategy to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy.	302	301			Delisting	Dear Director Ashe, Grizzly bears are an iconic animal in Westâ€they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan and conservation strategy to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	
Clearly as the death of Scarface in November 2015 shows, Grizzlies are endangered by "hunters who do not obey the laws." The recent case of a bear being chased down by a truck, these behaviors show what will happen if these iconic bears are delisted.	302	301			Delisting	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Clearly as the death of Scarface in November 2015 shows, Grizzlies are endangered by "hunters who do not obey the laws." The recent case of a bear being chased down by a truck, these behaviors show what will happen if these iconic bears are delisted. Unfortunatley, the 'out of control,' portion of the population who want to trophy hunt and kill these bears irresponsibly, make it impossible to delist them. They have only just returned from the brink. Grizzly bears are an iconic animal in Westâ€they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. These bears generate billions of dollars in tourist revenues a year and you want to give that up so they can be indiscriminately killed? Why? Thank you. Sincerely,	Endangered Species Coalition	

You also need to be aware of Wyoming's Hostility to Grizzly Bears. Here is a link that discusses this attitude that does nothing for the Grizzly, but supports trophy hunting Grizzlies. http://www.jhnewsandguide.com/opinion/columnists/the_new_west_todd_wilkinson/beware-wyoming-s-hostility-to-grizzlies/article_e14a25bf-bd75-508a-b873-1c19ca98cb03.html	301	303			Delisting	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€ they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in Westâ€ they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. You also need to be aware of Wyoming's Hostility to Grizzly Bears. Here is a link that discusses this attitude that does nothing for the Grizzly, but supports trophy hunting Grizzlies. http://www.jhnewsandguide.com/opinion/columnists/the_new_west_todd_wilkinson/beware-wyoming-s-hostility-to-grizzlies/article_e14a25bf-bd75-508a-b873-1c19ca98cb03.html Thank you. Sincerely,	Endangered Species Coalition	
I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed.	301				Delisting	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been an amazing Endangered Species Act success story. However, after reading it today, I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope. They should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears therein. Secondly, please create a delay in the onset of any grizzly bear hunting for several years, post-delisting, to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Especially there, we should definitely treat them as our neighbors, not merely as game animals. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. This should be standard policy in national parks and forests. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in West. I know they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	

Aren't humans amazing? They kill wildlife – birds, deer, all kinds of cats, coyotes, beavers, groundhogs, mice and foxes by the million in order to protect their domestic animals and their feed.	301				Delisting	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope—they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in West—they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Aren't humans amazing? They kill wildlife – birds, deer, all kinds of cats, coyotes, beavers, groundhogs, mice and foxes by the million in order to protect their domestic animals and their feed. Then they kill domestic animals by the billion and eat them. This in turn kills people by the million, because eating all those animals leads to degenerative and fatal health conditions like heart disease, stroke, kidney disease, and cancer. So then humans spend billions of dollars torturing and killing millions more animals to look for cures for these diseases. Elsewhere, millions of other human beings are being killed by hunger and malnutrition because food they could eat is being used to fatten domestic animals. Meanwhile, few people recognize the absurdity of humans, who kill so easily and violently, and once a year send out cards praying for Peace on Earth. David Coates www.cowspiracy.com/ Thank you. Sincerely,	Endangered Species Coalition	
I am sure you aware that grizzlies are threatened by climate change, development, habitat fragmentation, road and train kills and by hunting.	301				Delisting	Dear Director Ashe, I am strongly opposed to any attempt to remove the Grizzly Bear from Endangered Species Act protections. I am sure you aware that grizzlies are threatened by climate change, development, habitat fragmentation, road and train kills and by hunting. Their low reproductive rate makes every bear special. The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope—they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in West—they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	

"Problem" bears are still handled on a case by case basis and economically, their value as a draw to the National Parks (Yellowstone and Teton) where they reside is estimated to be greater than \$10,000,000 per year. Any income gained by delisting and issuing hunting permits would be short lived and modest to nonexistent in comparison. The argument that trophy hunting will be economically important to saving the grizzly is arcane and outdated. One should also factor in the sentiments not only of our nation, but that of people from around the globe, many whom travel to the US annually for the chance of glimpsing one of these iconic bears.	301	302	303		Delisting	Dear Director Ashe, I am writing today to express my concern over the proposed plan to delist the Grizzly Bear from the Endangered Species Act. Many have stated on social media and in articles concerning the subject that appealing to your office and the state governments of Idaho, Montana and Wyoming is a waste of time. As far as I am concerned, you are still part of the US Government and, as such, for the people. Therefore, I am confident that you will treat the concerns of all constituents with thoughtful consideration in this and all matters related to your work. My vote would be to keep the Grizzly Bear under the protection of the Endangered Species Act. Yes, grizzly numbers in the Greater Yellowstone Ecosystem have grown from a low near 150 before listing, to over 700. Seven Hundred.....not a large number by any means. Couple that with the facts that they are very slow to reproduce, have at best a 50% chance of making it to breeding age and their primary food sources are being devastated by climate change make this rebound in numbers tenuous at best. If delisting has to happen, then I would encourage you to make the draft delisting proposal stronger to protect those bears whose territories expand outside Yellowstone and Grand Teton National Parks. I would like to see a buffer area expanded to include the entire Greater Yellowstone Ecosystem with corridors to connect this area with that of other grizzly bear habitats, increasing the genetic viability of these bears. At this time, there is no economic or safety value to delisting. "Problem" bears are still handled on a case by case basis and economically, their value as a draw to the National Parks (Yellowstone and Teton) where they reside is estimated to be greater than \$10,000,000 per year. Any income gained by delisting and issuing hunting permits would be short lived and modest to nonexistent in comparison. The argument that trophy hunting will be economically important to saving the grizzly is arcane and outdated. One should also factor in the sentiments not only of our nation, but that of people from around the globe, many whom travel to the US annually for the chance of glimpsing one of these iconic bears. How can we ask other nations to conserve and protect their wildlife when we stop protecting ours? And, yes, they are a keystone species. Their recovery, along with that of the two other major predators in Greater Yellowstone, the wolf and the mountain lion, have been shown to have improved the health of the entire ecosystem. I hope that you will consider this argument and that, in the final vote, our federal government will stand behind continuing to protect this iconic species. Sincerely, Candace Brad, DVM	Endangered Species Coalition	
As a visitor to Grizzly country for many years, I am saddened, bewildered, and angered by the fractured proposals for these animals. The Grizzly population has surely increased over the years, but it is still in need of protection. Their food sources have been severely cut back, and after talking to the many people I have contact with within Griz regions, I know that many hunters just can't wait to kill them. They are salivating to kill the Grizzly, and strict and enforceable regulations are not in place. The Grizzly populations are not able to withstand these mental attitudes. It seems as though government agencies set up to protect the Grizzly are doing just the opposite	303	301			Delisting	Please accept my comments on the proposed delisting rule. As a visitor to Grizzly country for many years, I am saddened, bewildered, and angered by the fractured proposals for these animals. The Grizzly population has surely increased over the years, but it is still in need of protection. Their food sources have been severely cut back, and after talking to the many people I have contact with within Griz regions, I know that many hunters just can't wait to kill them. They are salivating to kill the Grizzly, and strict and enforceable regulations are not in place. The Grizzly populations are not able to withstand these mental attitudes. It seems as though government agencies set up to protect the Grizzly are doing just the opposite. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflict with humans.	GYC	

Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead.	302	301	303		Delisting	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the	GYC	
Please accept my comments Delist the grizzly bears. I have seen them in the Lander foothills . There are too many of them and need to be delisted. They affect my hunting, horses, livestock negatively. We have plenty in the Yellowstone environment. I do not want them around the Lander area!	304				Delisting	Please accept my comments Delist the grizzly bears. I have seen them in the Lander foothills . There are too many of them and need to be delisted. They affect my hunting, horses, livestock negatively. We have plenty in the Yellowstone environment. I do not want them around the Lander area!	GYC	

All animals should be fully recovered and monitored if removed from the ESA. The grizzly bear is having a hard time recovering while having some protection. It is proven that when a species is delisted, states allow hunting to become a slaughter fest and the species has no chance to survive. Please keep the Grizzly protected.	301				Delisting	I am writing to ask that you do not delist Yellowstone grizzly bears. Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered. Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species. All animals should be fully recovered and monitored if removed from the ESA. The grizzly bear is having a hard time recovering while having some protection. It is proven that when a species is delisted, states allow hunting to become a slaughter fest and the species has no chance to survive. Please keep the Grizzly protected. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society	
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All apex predators occupy an important niche and provide an important function toward keeping their ecosystem healthy. The truth of this scientific principle has been amply shown by the re-introduction of wolves to Yellowstone. When Grizzly bears have reached their optimal population, it will stop growing and, like the wolves, will stabilize. Yet, their current numbers suggest that Grizzly bears are far from recovered and need to maintain their ESA protections.	301				Delisting	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. All apex predators occupy an important niche and provide an important function toward keeping their ecosystem healthy. The truth of this scientific principle has been amply shown by the re-introduction of wolves to Yellowstone. When Grizzly bears have reached their optimal population, it will stop growing and, like the wolves, will stabilize. Yet, their current numbers suggest that Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	
A range of scientists have said that delisting is premature and Grizzly bears are far from recovered.	301				Delisting	Please protect these animals. There is no reason to lift protections from them. A range of scientists have said that delisting is premature and Grizzly bears are far from recovered. So, we need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	

The agency is under pressure from the states around Yellowstone -- Wyoming, Montana and Idaho -- to allow hunting of bears that roam outside the park's boundaries.	303				Delisting	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. Preserving federal protections for grizzly bears is paramount to species' survival BY GARY CARTER SPECIAL TO THE DAILY CALLAST UPDATED APRIL 1, 2016 Comment 3 In 1805, the explorers Meriwether Lewis and William Clark, making their way across the West, were warned by Native American tribes of grizzly bears' awesome strength. At first, Lewis scoffed at the tribes' advice, writing in his journal that "in the hands of skillful riflemen they are by no means as formidable or dangerous as they have been represented." A few terrifying encounters with the bears, though, changed his mind about that. A little more than a century later, crowds at Yellowstone National Park would gather in delight to watch the bears dine on food scraps. Signs were marked "Lunch Counter ... for Bears Only." Those days are long gone, but crowds still flock to Yellowstone -- nearly 4 million visitors every year -- partly to catch a glimpse of the storied creatures. The grizzly bears that live in and around Yellowstone make up almost half the population in the lower 48 states, and now those bears are at risk. In 2015, their numbers in the Yellowstone area declined by 40, to an estimated 717 from 757 -- a 6 percent drop that represents the highest one-year mortality since grizzlies were given federal protection in 1975. Despite this decline, the U.S. Fish and Wildlife Service is currently preparing to strip the animals of their Endangered Species Act protection. The agency is under pressure from the states around Yellowstone -- Wyoming, Montana and Idaho -- to allow hunting of bears that roam outside the park's boundaries. Now, the proposal to call the bears recovered and remove their protection is imminent. If the rule is finalized, it's likely to allow states to reduce bear numbers by more than 100 practically overnight. But the bears are already struggling, threatened by declines in important foods such as white-bark pine and Yellowstone cutthroat trout, as well as by their isolation from other grizzly populations. Historically, grizzlies ranged from Alaska to Mexico, with at least 50,000 bears living in the western half of the contiguous United States. Today only about 1,500 to 1,700 grizzlies survive outside Alaska, in five isolated populations in the northern Rocky Mountains and the Cascades. Numbers in the Greater Yellowstone area have increased.	Humane Society Petition	
The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them.	303	301			Delisting	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. We need to see more progress in the recovery of bear populations, and it may be that the protections can never be removed. Human encroachment is devastating on all wild species. I urge you to act so that future generations will be able to appreciate this majestic creature-- not just trophy hunters.	Humane Society Petition	Doesn't trust the motive

But the service has been systemically ignoring -- indeed actively working to redefine and thus dismantle -- this "significant portion of its range" requirement under both the George W. Bush and Barack Obama administrations.	303				Delisting	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. Preserving federal protections for grizzly bears is paramount to species' survival BY GARY CARTER SPECIAL TO THE DAILY CALLAST UPDATED APRIL 1, 2016 Comment 3 In 1805, the explorers Meriwether Lewis and William Clark, making their way across the West, were warned by Native American tribes of grizzly bears' awesome strength. At first, Lewis scoffed at the tribes' advice, writing in his journal that "in the hands of skillful riflemen they are by no means as formidable or dangerous as they have been represented." A few terrifying encounters with the bears, though, changed his mind about that. A little more than a century later, crowds at Yellowstone National Park would gather in delight to watch the bears dine on food scraps. Signs were marked "Lunch Counter ... for Bears Only." Those days are long gone, but crowds still flock to Yellowstone -- nearly 4 million visitors every year -- partly to catch a glimpse of the storied creatures. The grizzly bears that live in and around Yellowstone make up almost half the population in the lower 48 states, and now those bears are at risk. In 2015, their numbers in the Yellowstone area declined by 40, to an estimated 717 from 757 -- a 6 percent drop that represents the highest one-year mortality since grizzlies were given federal protection in 1975. Despite this decline, the U.S. Fish and Wildlife Service is currently preparing to strip the animals of their Endangered Species Act protection. The agency is under pressure from the states around Yellowstone -- Wyoming, Montana and Idaho -- to allow hunting of bears that roam outside the park's boundaries. Now, the proposal to call the bears recovered and remove their protection is imminent. If the rule is finalized, it's likely to allow states to reduce bear numbers by more than 100 practically overnight. But the bears are already struggling, threatened by declines in important foods such as white-bark pine and Yellowstone cutthroat trout, as well as by their isolation from other grizzly populations. Historically, grizzlies ranged from Alaska to Mexico, with at least 50,000 bears living in the western half of the contiguous United States. Today only about 1,500 to 1,700 grizzlies survive outside Alaska, in five isolated populations in the northern Rocky Mountains and the Cascades. Numbers in the Greater Yellowstone area have increased.	Humane Society Petition	
Scientists tell us that keeping these grizzly bears on the list is the correct course of action, exactly because their population is nowhere near their pre-settlement population in the lower 48 states.	303				Delisting	We need to continue to increase the bear population, not allow their numbers to drop for sport, especially in the GYW area. Scientists tell us that keeping these grizzly bears on the list is the correct course of action, exactly because their population is nowhere near their pre-settlement population in the lower 48 states.	Humane Society Petition	

We have so few megafauna left in the wild. Please continue to protect them, for now and for future generations.	301				Delisting	We have so few megafauna left in the wild. Please continue to protect them, for now and for future generations. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	
With the lowest reproductive rate of any mammal in North America, grizzly bears cannot sustain many deaths, especially among adults. Most grizzlies die because people kill them, so controlling the rates at which we kill these animals is crucial. In fact, the ESA has been vital to reducing rates of human-caused grizzly bear mortality. Under the ESA, killing grizzly bears is prohibited except in self-defense situations. Hunting is banned. And poachers have been successfully prosecuted under the Act, with some paying hefty fines.	301				Delisting	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. With the lowest reproductive rate of any mammal in North America, grizzly bears cannot sustain many deaths, especially among adults. Most grizzlies die because people kill them, so controlling the rates at which we kill these animals is crucial. In fact, the ESA has been vital to reducing rates of human-caused grizzly bear mortality. Under the ESA, killing grizzly bears is prohibited except in self-defense situations. Hunting is banned. And poachers have been successfully prosecuted under the Act, with some paying hefty fines. Given the ethos of the states, who appear more interested in appeasing ranchers and hunters, claims that the states would exercise caution after delisting sound facile. We can predict what will happen without the curbing effects of the ESA, as pressure mounts from the politically well-connected few who want to kill more bears. The states are likely to unabashedly react to conflicts, not with compassion but with firepower. Grizzly bears should expect anything but a safety net from the states. There is every reason to believe that, over time, state management will reverse the gains made over the last 40 years of endangered species protections. This is especially likely given the crisis that Yellowstone grizzly bears are facing now. During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably happened. This totals over 90 bears, or in excess of 12% of the population. And this with the federal safety net. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	

The wildlife watching, photographing, pro-wildlife population has absolutely no say in these matters - our voices need to count too, as we outnumber the extreme, fringe, anti-wildlife groups.	302				Delisting	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. It has been scientifically shown that apex wildlife, such as the grizzly, are essential to healthy ecosystems. Grizzly bears have recovered to less than 10% of their original range - how can that be considered recovered enough to remove them from the endangered list? Living grizzly bears can bring in millions of dollars into the economy through wildlife watching, photographing, eco-tours, etc. Allowing hunting on these great American icons, lets a small extreme fringe of the population to take the experience of viewing a grizzly bear in the wild away from everyone forever. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Why is it that only pro-hunting and anti-wildlife groups have all the sway with these decisions. The wildlife watching, photographing, pro-wildlife population has absolutely no say in these matters - our voices need to count too, as we outnumber the extreme, fringe, anti-wildlife groups. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	
For the grizzly bears x to be removed from federal protections serves only those who hunt , not the animals we are bound to x protect	303				Delisting	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. All species are important to our ecosystem, especially those whose numbers have been decimated due to human interference. For the grizzly bears to be removed from federal protections serves only those who hunt, not the animals we are bound to protect.	Humane Society Petition	Don't trust the motive for delisting.

It is an unfortunate fact that without the vital safety net provided by the Endangered Species Act (ESA), Yellowstone's grizzly bears are likely to be pushed back to the brink of extinction. Here's why: Yellowstone's current population of roughly 650 to 750 grizzly bears is much smaller than the 2000+ animals widely considered by experts to be necessary for long-term viability. Altogether, the five remaining grizzly bear populations in the lower-48 states number perhaps 1500, a mere 1-2% of the 100,000 grizzly bears that once roamed the contiguous U.S. in a range that was formerly 100 times larger. The federal government plans on deliberately perpetuating this precarious situation, even though it means trucking bears into Yellowstone every ten years to deal with genetic problems, and trusting state wildlife management agencies that have notoriously anti-carnivore track records.	301	303			Delisting	I am very concerned about your agency's proposal to delist Yellowstone grizzly bears and thank you for the opportunity to provide comments on the proposed rule. It is an unfortunate fact that without the vital safety net provided by the Endangered Species Act (ESA), Yellowstone's grizzly bears are likely to be pushed back to the brink of extinction. Here's why: Yellowstone's current population of roughly 650 to 750 grizzly bears is much smaller than the 2000+ animals widely considered by experts to be necessary for long-term viability. Altogether, the five remaining grizzly bear populations in the lower-48 states number perhaps 1500, a mere 1-2% of the 100,000 grizzly bears that once roamed the contiguous U.S. in a range that was formerly 100 times larger. The federal government plans on deliberately perpetuating this precarious situation, even though it means trucking bears into Yellowstone every ten years to deal with genetic problems, and trusting state wildlife management agencies that have notoriously anti-carnivore track records. Entrusting grizzly bear management to the states leaves the rest of us without a democratic voice in ensuring the survival of these magnificent creatures. Moreover, although grizzly populations could be naturally supplemented by maintaining corridors connecting Yellowstone grizzlies with their cousins in Glacier National Park, this option is being foreclosed. Meanwhile, grizzly habitat is shrinking due to growing numbers of hobby ranches, vacation homes, and hunters in pursuit of a grizzly bear trophy. Although bears are demonized for hunting cattle, sheep, and even game, their pine nut and other dietary staples are also being impacted by human damage to the ecosystems that sustain them. I ask that you NOT delist the grizzlies. Moreover, I also ask that you NOT entrust their management and responsibility for stewardship to the states. Doing so would effectively disenfranchise me from a voice in an important part of my--and my children's--national, natural heritage. I further ask that National Park Service managers be assured a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, I ask for measures to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. Please also address the fact that climate disruption is impacting grizzly bears' habitat, food sources and behavior, and take these changes into account when managing for the HEALTH of grizzly bear populations--not their reduction. Thank you again for your consideration.	NPCA	
In particular, I ask for measures to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans.	302				Delisting	I am very concerned about your agency's proposal to delist Yellowstone grizzly bears and thank you for the opportunity to provide comments on the proposed rule. It is an unfortunate fact that without the vital safety net provided by the Endangered Species Act (ESA), Yellowstone's grizzly bears are likely to be pushed back to the brink of extinction. Here's why: Yellowstone's current population of roughly 650 to 750 grizzly bears is much smaller than the 2000+ animals widely considered by experts to be necessary for long-term viability. Altogether, the five remaining grizzly bear populations in the lower-48 states number perhaps 1500, a mere 1-2% of the 100,000 grizzly bears that once roamed the contiguous U.S. in a range that was formerly 100 times larger. The federal government plans on deliberately perpetuating this precarious situation, even though it means trucking bears into Yellowstone every ten years to deal with genetic problems, and trusting state wildlife management agencies that have notoriously anti-carnivore track records. Entrusting grizzly bear management to the states leaves the rest of us without a democratic voice in ensuring the survival of these magnificent creatures. Moreover, although grizzly populations could be naturally supplemented by maintaining corridors connecting Yellowstone grizzlies with their cousins in Glacier National Park, this option is being foreclosed. Meanwhile, grizzly habitat is shrinking due to growing numbers of hobby ranches, vacation homes, and hunters in pursuit of a grizzly bear trophy. Although bears are demonized for hunting cattle, sheep, and even game, their pine nut and other dietary staples are also being impacted by human damage to the ecosystems that sustain them. I ask that you NOT delist the grizzlies. Moreover, I also ask that you NOT entrust their management and responsibility for stewardship to the states. Doing so would effectively disenfranchise me from a voice in an important part of my--and my children's--national, natural heritage. I further ask that National Park Service managers be assured a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, I ask for measures to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. Please also address the fact that climate disruption is impacting grizzly bears' habitat, food sources and behavior, and take these changes into account when managing for the HEALTH of grizzly bear populations--not their reduction. Thank you again for your consideration.	NPCA	

Please, I ask of you to take the following into account as my life has been about saving these magnificent creatures as well as others on the endangered species list and how de-listing them only makes them vulnerable to extinction once again!	302	301			Delisting	Please, I ask of you to take the following into account as my life has been about saving these magnificent creatures as well as others on the endangered species list and how de-listing them only makes them vulnerable to extinction once again! I ask that you reviewing the following as removing any animal from the endangered species list only allows the opportunity for the status to return once again to endangered one day after many lives are lost in terribly cruel ways. I ask that you stop the yo-yoing that had been happening with this very sacred act. Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Thanks again for considering my comments.	NPCA	
Your proposal is against SCIENCE and the majority of people	303				Delisting	Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Your proposal is against SCIENCE and the majority of people. I believe that you have failed miserably to do your job when it comes to WOLVES and wolverines and now you want to politically remove bears from protections. This is unconscionable and unacceptable. You all should be comprised ONLY of scientists and animal lovers/animal rights activists (in order to reflect SCIENCE and the majority of people/your bosses). WOLVES, wolverines and bears are ENDANGERED and the people want them PROTECTED. The problem is you are comprised of folks with a conflict of interest/incapable of doing your job/in complete opposition to doing your job. You have non scientists and hunters in your midst (with their own conflicting agendas). There are over 300 million people in the country and ONLY 13 million hunt. They're a minority/special interest in direct conflict with the majority (who you're supposed to regulate; not cater to). ONLY hunting for food should be legal. That means WOLVES and bears should never be hunted. Ecosystems thrive ONLY when apex predators are present (WOLVES). You all should be FIRED. STOP the unscientific delisting and keep bears on the ENDANGERED species list and relist WOLVES and wolverines on the ENDANGERED species list. The ONLY species that is experimental/non-essential is man. I'm fed up with tax dollars paying	NPCA	

I support your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears. They are based on science and are good measures to take. I oppose any extreme measures by environmentalists saying that more measures are needed to protect bears. They are not based on science and are a minimal few people.	304				Delisting	Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I support your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears. They are based on science and are good measures to take. I oppose any extreme measures by environmentalists saying that more measures are needed to protect bears. They are not based on science and are a minimal few people. Thanks again for considering my comments.	NPCA	
ALL ANIMALS deserve the right to be equally protected, no matter if they are a pet or not. Set an example	302				Delisting	ALL ANIMALS deserve the right to be equally protected, no matter if they are a pet or not. Set an example	WELC	

As the Native Americans say about killing bears, "You don't kill your brother".	302				Delisting	As the Native Americans say about killing bears, "You don't kill your brother".	WELC	
For too long, human beings have assumed animals are non-sentient, unintelligent and, therefore, ours to disrespect and exploit as we will. Today, often new research is published that denies humankind's previously arrogant assumptions about other species, and our lack of respect and care must change. Money and politics should not have the weight that they do on what is essentially an ethical question.	302	303			Delisting	I am writing to urge you to postpone delisting of the Yellowstone grizzly bear population. The proposal to remove Yellowstone grizzly bears from the endangered species list fails to preserve the progress made toward bear recovery. In fact, it will reverse it. The Greater Yellowstone grizzly bear is one of the United States' most iconic species. Held sacred by native communities for thousands of years in the west, the majestic grizzly has become a treasured symbol of our wild heritage. Visitors spend millions of dollars in the region every year, a vital part of many local economies, in the hopes of spotting a magnificent grizzly. The loss of the grizzly would be a loss for the entire region, and a disservice to the wildlife professionals, dedicated conservationists and wildlife advocates who have fought to save them. While grizzlies have made a comeback, their recovery is still a delicate and uncertain effort. Grizzly bears occupy less than 2% of their historic range in the lower 48 and reproduce very slowly, at a rate of only 1-2 cubs every few years. In the Yellowstone region, the growth of the population has stalled since the early 2000s, and there was a 6% decline last year. The proposed rule leaves Greater Yellowstone grizzlies in the crosshairs, as states have made clear their plans to reduce the population, including through trophy hunts. Management of grizzly bears outside of the national parks would be left completely up to the states, which have historically been hostile to bears and other large carnivores. The current proposal would allow states to exceed maximum bear deaths for years before any review, allowing for potentially irreversible damage, and would allow complete eradication of bears in some areas. The loss of female grizzlies to trophy hunters who will not be able to tell the difference between a male and female bear could cause a steep, quick decline before emergency action can be taken. Additionally, the Yellowstone grizzly population remains isolated; further limiting their range and numbers could prevent them from ever connecting to other grizzly populations. People and bears can coexist. We should not let bears slide back towards extinction because of misplaced political hostility towards these magnificent and beloved creatures. The end result of this proposal will be fewer bears limited to less land and with access to fewer resources necessary for survival. For too long, human beings have assumed animals are non-sentient, unintelligent and, therefore, ours to disrespect and exploit as we will. Today, often new research is published that denies humankind's previously arrogant assumptions about other species, and our lack of respect and care must change. Money and politics should not have the weight that they do on what is essentially an ethical question.	WELC	

I attended the recent hearing in Bozeman MT on delisting and listened to all the comments. The speakers against seemed to have science based reasons and questions for opposing the delisting. The speakers for delisting all just said "the bear population has recovered, is stable and the bear should be delisted. No one supporting delisting said what would be gained by delisting. I went away from the hearing believing the issue for the delisting people is really about who has the power to make the decision about the bear's future. The bear is just caught in the middle. In summary, I see very little to gain by delisting and a lot of risk. If the bear populations are stable, it shouldn't grow appreciably over the next 10-20 years and time will tell if any of the science based arguments hold water	303				Delisting	I believe that delisting the grizzly bear from endangered species will be a regrettable mistake, and allowing the hunting of bears will do damage to hunting in general. Therefore, I oppose delisting. Grizzlies are an emotional issue and killing bears for trophy rugs or mounts and leaving the meat in the field will reach an audience and raise an outcry against hunting. Note the recent MN dentist who shot the lion and paid dearly for it. The number of hunters in America is declining, but interest in wildlife is rising. The bear is a draw to visitors in Yellowstone and Glacier Parks. What hiker (or hunter) does not tell with excitement his recent encounter with a grizzly. The bear is worth more alive than the small gain for a few outfitter trips and licensing fees. And tech social communications allow a campaign against unpopular actions to grow instantly. The science states that the bears have recovered and the population is "stable". Last year more than 60 bears were killed for various acceptable reasons. That number was nearly 10 percent of the total "stable" population. Grizzly reproduction is slow and it will take a few years to recover that 60 bears. Another year of 60 bears lost would put the bear right back on the list. I attended the recent hearing in Bozeman MT on delisting and listened to all the comments. The speakers against seemed to have science based reasons and questions for opposing the delisting. The speakers for delisting all just said "the bear population has recovered, is stable and the bear should be delisted. No one supporting delisting said what would be gained by delisting. I went away from the hearing believing the issue for the delisting people is really about who has the power to make the decision about the bear's future. The bear is just caught in the middle. In summary, I see very little to gain by delisting and a lot of risk. If the bear populations are stable, it shouldn't grow appreciably over the next 10-20 years and time will tell if any of the science based arguments hold water. We should just leave the Grizzly Bear alone. I have seen them hiking and hunting and it raised the quality of my time in the woods. I hope they will always be there.	FWS-R6-ES-2016-0042-1288	
Also, many Native American tribes oppose the delisting of the grizzly, and I stand by their opposition as the grizzly is culturally and environmentally important to them.	302				Delisting	I do not support removing the GYE grizzly bear population protections. As a guide and educator in the Greater Yellowstone Ecosystem, I believe that there are some flaws with this proposal. First of all, two main food sources of Yellowstone grizzlies- Whitebark Pine Nuts and Cutthroat Trout- are not stable, and it is unclear what effect their further decline will have on grizzlies who rely heavily on them for food. The Center for Biological Diversity recognizes the threat of climate change on these food sources and therefore on the grizzly. Grizzly mortality is also increasing. Even if there were an accurate count of grizzlies in the ecosystem, this should be cause for concern. Their range is also merely a fraction of what it was historically-somewhere around 4%. Is that really enough range to be considered recovered to a point where delisting can be an option? Also, many Native American tribes oppose the delisting of the grizzly, and I stand by their opposition as the grizzly is culturally and environmentally important to them. Having seen the treatment of wolves in the states of Montana, Idaho, and Wyoming following their delisting, I have little confidence in the ability of the states to manage another large predator with trophy hunts. Wyoming had its control of wolves revoked; and I do not believe they will do any better with their control of grizzlies. The grizzly bear is still a recovering, threatened animal in the Greater Yellowstone Ecosystem.	FWS-R6-ES-2016-0042-5204	

The delisting of the Yelloestone grizzlies would be a devastating mistake for many reasons. To preserve and enhance this isolated gene pool good science should provide guidance to implement a plan to provide interaction with other bear populations. This would also allow for a greater range for food forage. Grizzlies have a slow rate of reproduction and any females lost would tip the scales unfavorably. A certain elements in some Western States is all too eager to decimate their bear and wolf populations. This hostility displaces scientific studies and any respect for their wildlife and the will of the people throughout the United States.	301	303			Delisting	The delisting of the Yelloestone grizzlies would be a devastating mistake for many reasons. To preserve and enhance this isolated gene pool good science should provide guidance to implement a plan to provide interaction with other bear populations. This would also allow for a greater range for food forage. Grizzlies have a slow rate of reproduction and any females lost would tip the scales unfavorably. A certain elements in some Western States is all too eager to decimate their bear and wolf populations. This hostility displaces scientific studies and any respect for their wildlife and the will of the people throughout the United States.	FWS-R6-ES-2016-0042-1926	
There has not been enough preparation to secure adequate habitat protection for them, and I am appalled that FWS continually caves in to pressure from ranching interests and adjacent State governments to facilitate hunting and culling of wildlife populations.	303				Delisting	Delisting Yellowstone Grizzlies in 2016 is an ill-advised and premature proposal. There has not been enough preparation to secure adequate habitat protection for them, and I am appalled that FWS continually caves in to pressure from ranching interests and adjacent State governments to facilitate hunting and culling of wildlife populations. Given the demonstrable and growing adverse effects of global warming on food sources bears rely upon, there is no justification for concluding that grizzly numbers have recovered sufficiently to remove this ecosystem's population from the protections of the ESA. Grizzlies in the lower forty-eight states have a special significance for millions of American citizens. Their continued existence (along with wolves and cougars) as the apex predators of the increasingly constricted natural wildlife areas is extraordinarily important to most of us. Given the fact that FWS has already screwed up the reintroduction of buffalo and wolves to the Yellowstone ecosystem, this proposed delisting should be postponed for at least another five years.	FWS-R6-ES-2016-0042-2400	

Your report indicates: "Grizzly bears are a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality and the manageable nature of this threat." Let's continue to protect, not weed out through hunting permits. I don't have a problem with management removals, but I don't trust that hunting can be well-regulated. The purpose of hunting Grizzlies would be for trophies, not food. This is not a good use of management techniques.	303				Delisting	Just because the population is has increased isn't enough reason to open the doors to hunting of these animals. Especially since you have noted in your Proposal: Grizzly bears have one of the slowest reproductive rates among terrestrial mammals, resulting primarily from the reproductive factors described above: Late age of first reproduction, small average litter size, and the long interval between litters..... Given the above factors, it may take a female grizzly bear 10 or more years to replace herself in a population. Grizzly bear females cease reproducing some time in their mid-to-late 20s. Doesn't this indicate that if you allow hunting of the Grizzly, it would become necessary down the road to institute a protected status again? Additionally, to further quote your Proposed Rule, "For grizzly bear populations, lambda estimates the average rate of annual growth, with a value of 1.0 indicating a stable population trend with no net growth or decline," If the lambda is stable, wouldn't allowing hunting begin to reduce the population to a negative lambda? Why promote hunting a species that has been designated at risk of extinction not so long ago. Can we not allow the stability to continue? And again from your Proposed Rule: "For long-lived mammals such as grizzly bears, extensive data collected over decades are needed to understand if and how these factors are operating in a population. We have these data for the GYE grizzly bear population, and the IGBST has been able to tease apart some of these confounding effects to find that density-dependent effects are the likely cause of the recent slow in population growth (see Changes in Food Resources under Factor E, below, for more detailed information)." If the population growth is slowing, let's not impose further growth reduction through hunting. Your report indicates: "Grizzly bears are a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality and the manageable nature of this threat." Let's continue to protect, not weed out through hunting permits. I don't have a problem with management removals, but I don't trust that hunting can be well-regulated. The purpose of hunting Grizzlies would be for trophies, not food. This is not a good use of management techniques. Controlling human interaction with the Grizzly population is a more suitable management procedure. Hunting is the worst possible approach. Please do not allow hunting of the Grizzly. Please. Chesha Keane	FWS-R6-ES-2016-0042-2469	
Subjecting Grizzly Bears to ego-driven hunters eager to needlessly kill them and then mount their carcasses on walls seems incredibly shortsighted, and contrary to good stewardship.	302	301			Delisting	I vehemently oppose removing Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I cannot understand any eagerness to erode the tenuous gains Grizzly Bears have made since being included on the list. Subjecting Grizzly Bears to ego-driven hunters eager to needlessly kill them and then mount their carcasses on walls seems incredibly shortsighted, and contrary to good stewardship. It is imperative that America's National Parks and their inhabitants be protected to the best of our ability. We do this for all Americans - current and future. We cannot shirk our duties. The beauty of our Parks and the wildlife they support must be preserved. If we fail in our duty, we are all diminished.	FWS-R6-ES-2016-0042-2590	

I read the proposed rule change and understand that hunting would be contingent upon what the states of Idaho, Montana and Wyoming do for management. Plus hunting would be away from areas of the park containing large numbers of visitors. But let's not be naive. Two things that will happen if the grizzly bears lose Federal protection. First, this population of bears has not been hunted in years. That means they do not have the learned survival and cautionary skills of other hunted animals. Grizzly bears are accustomed to being the top predator once they reach adulthood, which will make the Yellowstone bears 'sitting ducks'. Hunters *will* sit at the hunting boundaries waiting for bears to cross the line. A naive group of grizzlies is a trophy hunter's dream. What will stop hunting guides, who work for people like Walter Palmer, from luring trophy bears out of protected areas? Park Rangers won't be able to watch every hunting group. Without Endangered Species protection, a US version of Cecil the Lion *will* happen.	301				Delisting	Please do not remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. Yellowstone grizzlies are a special population in a special place. Only there, with all of the protections, can novice wildlife enthusiasts glimpse a view of a grizzly bear in its natural habitat behaving as it might in real life, without fear of humans. I am from Michigan and camp every year in the Upper Peninsula near Seney. According to our State DNR, 15000 - 19000 black bears live in the U.P., or ~1 bear/square mile. That is 5 times more higher the number of grizzlies in Yellowstone (~700 bears/ 3468 sq.miles). Yet, we haven't seen a live bear in 20 years. We see plenty of bear hunters and bear hounds, but, ever since bear hunting became so popular, the only bears we see are dead ones strapped across the hoods of trucks. I know black bears are shy, but the high hunting pressure makes them flee all humans. It would be a crime for all future generations of Americans to allow the same thing to happen in Yellowstone. My only visit to Yellowstone was in 2002 when my family camped there for 10 days. In addition to bison and thermal features, we hoped to see a grizzly bear. And we did! We were fortunate enough to have 3 separate sightings of grizzlies high on a hill and ambling across a meadow. When the bear appeared, everyone and every vehicle stopped. We stood with total strangers, watching for over an hour until the bear moved on and out of sight. That was pure magic which all Americans should be allowed to experience. I read the proposed rule change and understand that hunting would be contingent upon what the states of Idaho, Montana and Wyoming do for management. Plus hunting would be away from areas of the park containing large numbers of visitors. But let's not be naive. Two things that will happen if the grizzly bears lose Federal protection. First, this population of bears has not been hunted in years. That means they do not have the learned survival and cautionary skills of other hunted animals. Grizzly bears are accustomed to being the top predator once they reach adulthood, which will make the Yellowstone bears 'sitting ducks'. Hunters *will* sit at the hunting boundaries waiting for bears to cross the line. A naive group of grizzlies is a trophy hunter's dream. What will stop hunting guides, who work for people like Walter Palmer, from luring trophy bears out of protected areas? Park Rangers won't be able to watch every hunting group. Without Endangered Species protection, a US version of Cecil the Lion *will* happen. Second, after the bears have been hunted for a season or two, they will learn. And they will avoid all humans as best as they can. Those magical sightings that my family	FWS-R6-ES-2016-0042-2659	
HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing.	303				Delisting	~~The greater Yellowstone ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes~~ Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS. HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. In my opinion, HSUS is again correct. Look at the brutal treatment and killing contests involving wolves in these same three states. It is ugly and awful to be a Montanan who treasures wildlife and yet state governments want to use them for "sport" and as a profit center. FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS says, the agency says it looks forward to hearing from the public about delisting. The truth is, the public has already made it's views known; A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented ~~an eight-page resolution that details spiritual, scientific, political, and environmental objections to~~	FWS-R6-ES-2016-0042-2695	

FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management.	303				Delisting	The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS. HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for delisting. In my opinion, HSUS is again correct. Look at the brutal treatment and killing contests involving wolves in these same three states. It is ugly and awful to be a Montanan who treasures wildlife and yet state governments want to use them for "sport" and as a profit center. FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS says, the agency says it looks forward to hearing from the public about delisting. The truth is, the public has already made its views known; A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to	FWS-R6-ES-2016-0042-2695	
Delisting will almost certainly lead to the reopening of sports hunting on grizzlies and the loss of genetic viability. It will hand over management of grizzlies to Montana, Wyoming and Idaho, states with poor to abysmal track records when it comes to defending the welfare of large predators.	301	303			Delisting	See Attached Attachments Regele Susan	FWS-R6-ES-2016-0042-3272	

I cannot fathom how studies into how to support their ecosystem have not been considered. You could not feign no knowledge of these issues when the bears have been so closely monitored over so many years.	302				Delisting	Only a few days ago I heard about the Proposed Rule to remove the Grizzly Bears within the Greater Yellowstone Ecosystem off the Federal List of Endangered and Threatened Wildlife list. This is to be done by the Fish and Wildlife Service. Many reasons for this have been explored in information offered, but this is where I think things become simple. You are either for the bears or against. In the research and explanations offered I am reading a text that is not only against these bears, but has been created in a way that I think appears biased in removing them from the list and I cannot fathom why this would be the case when it should be unbiased and simply based on facts gathered from multiple sources and from people with education in multiple disciplines. I am for the bears. I have an understanding that you believe their ecosystem will/has become incapable of supporting the current population, and that in the future the ecosystem will not be able to support them. I cannot fathom how studies into how to support their ecosystem have not been considered. You could not feign no knowledge of these issues when the bears have been so closely monitored over so many years. Where are the cutthroat trout, what can be done to ensure growth in this area, instead of the constant decline in numbers. Are the bears incapable of eating Lake trout and if this is the case why were they introduced to the ecosystem? What of the Whitebark pine seeds. If fires and beetles have seen a sharp decline in available food from these trees, what has been done since 1988 to replace what was lost. See, if you were for the bears all of these missing links in their ecosystem would have been on the to do list, would have been taken care of, so who dropped the ball? Is shooting Grizzlies in Yellowstone the answer, I don't think so. If your bears in your park are going to starve to death then look at how to fix it, not kill the bears so as to try to fool people. Where is the transparency in releasing data collected by your government. The IGBST is not releasing this, and that makes this situation look a lot more deplorable than it POSSIBLY is. Without evidence being able to be scrutinized by people outside of government and people with nil vested interests having a say in this decision how do we know that this decision is correct and honorable. Public Relations. My friends have visited your lovely park, and I had plans in the future to make this one of my destinations as they want to go back. I will not visit. Not only will I not visit, but I will tell anyone I know not to visit, not to support and not to participate. Without the draw card of me visiting Yellowstone I have no other reason to travel to your country in which case I will never visit and you will not get my money. Please take that seriously. I had always wanted to see Canada, but their recent decision to kill Polar Bears has now made me declare	FWS-R6-ES-2016-0042-3745	
I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters.	303				Delisting	I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters. Yellowstone was almost destroyed with this insane and uneducated war on wolves and now (do we learn nothing??) the same is happening with the Grizzly Bears. It is mind boggling. Please consider that: Everything in your power should be done to protect this amazing mammal. FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Declining food sources pose a threat to Grizzlies and this delisting will be devastating to the Grizzly's chance of survival. Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Another natural curb in their number. Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains Grizzlies occupy only 1% of their historic range. AND PLEASE TAKE NOTE: Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years, caused by ignorant planning by humans, by the way.. Hoping for some forward thinking and moral courage here! Thank you Anne K	FWS-R6-ES-2016-0042-3905	

Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains	303				Delisting	I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters. Yellowstone was almost destroyed with this insane and uneducated war on wolves and now (do we learn nothing??) the same is happening with the Grizzly Bears. It is mind boggling. Please consider that: Everything in your power should be done to protect this amazing mammal. FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Declining food sources pose a threat to Grizzlies and this delisting will be devastating to the Grizzly's chance of survival.. Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Another natural curb in their number. Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains Grizzlies occupy only 1% of their historic range. AND PLEASE TAKE NOTE: Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years, caused by ignorant planning by humans, by the way.. Hoping for some forward thinking and moral courage here! Thank you Anne K	FWS-R6-ES-2016-0042-3905	
Grizzly bear populations have rebounded and are no longer threatened with extinction. We need to move on and use the money spent on grizzly bears on other more threatened species. When the public discourse becomes about "warm and fuzzies" instead of established science, we've crossed over the intent of the ESA. USFWS has done everything the courts have required, now let's allow them to dedicate their resources to more pressing matters.	304				Delisting	At some point, the public needs to come to terms that the ESA worked in this instance. Grizzly bear populations have rebounded and are no longer threatened with extinction. We need to move on and use the money spent on grizzly bears on other more threatened species. When the public discourse becomes about "warm and fuzzies" instead of established science, we've crossed over the intent of the ESA. USFWS has done everything the courts have required, now let's allow them to dedicate their resources to more pressing matters.	FWS-R6-ES-2016-0042-5009	

The delisting of Grizzly Bears is premature.	301				Delisting	The delisting of Grizzly Bears is premature. They reproduce very slowly and are still struggling to reach a stable population. This unusual winter was particularly hard on them. These magnificent creatures must be cherished, not hunted as trophies. Their population will soon be decimated. Many are already lost to illegal poaching. They have a very hard time surviving on their own without the addition of being killed as trophies. Please reconsider, and Do Not delist Grizzly Bears.	FWS-R6-ES-2016-0042-0026	
Simply stated: Lift the ESA ban on hunting and the local economy could lose a growing revenue stream that is currently estimated at \$10 million, and would affect more than 150 jobs in the area. Why? The lifting of ESA protections and granting the management of bears to individual states mean one thing: trophy hunting. It is an activity that attracts a small percentage of the population, and brings in far less than the estimated \$10 million in revenue in the non-consumptive activity of bear viewing.	303				Delisting	While I am sure many people are contributing scientific comments about why the delisting should not occur, I would like to discuss why delisting would be bad in terms many people will understand: money. Simply stated: Lift the ESA ban on hunting and the local economy could lose a growing revenue stream that is currently estimated at \$10 million, and would affect more than 150 jobs in the area. Why? The lifting of ESA protections and granting the management of bears to individual states mean one thing: trophy hunting. It is an activity that attracts a small percentage of the population, and brings in far less than the estimated \$10 million in revenue in the non-consumptive activity of bear viewing. The problem comes in as many of the bears who spend their summer in Yellowstone -- the same ones where a study found that people would pay an extra \$41 if they are guaranteed to see a bear -- are human-habituated. They are in many ways celebrities. But bears do not understand political boundaries. And for those who are these celebrities within the Park, they don't know the difference between a human pointing a camera or a gun. As such, the first and most likely victims of trophy hunting are these roadside, human-habituated bears. Of course, not every bear have the same tolerance for people. By killing the most people-habituated ones first would leave a population of bears that are more prone to hide from people (we can't simply replace a human-conditioned bear with one that isn't, which is something the statistics do not account). It's really hard to take in the activity of bear viewing if they are constantly trying to hide. This will do nothing to satisfy the growing demand of people wanting to see bears, and the loss of the road-side bears by killing them outside the park will have a negative impact on the jobs and the revenue as outlined above. For these reasons, and for reasons outlined by those with a much more scientific-based argument on the biology of bears and their habitat, I urge that the ESA protections remain in place.	FWS-R6-ES-2016-0042-0024	

Please reject the politicised/ uninformed directives of those who put personal or monetary concern above protecting the long term viability of one of the few remaining relatively intact ecosystems in our nation.	303				Delisting	I oppose the delisting of GYE Grizzlies; of all the reproductive cycles of large mammals of this continent, theirs is the slowest- approximately 10 years for a healthy breeding sow to reproduce herself in a guild of niches; as climate conditions change and all interdependent species adjust, the stability of the network will be tested; to err on the side of caution is only prudent. Please reject the politicised/ uninformed directives of those who put personal or monetary concern above protecting the long term viability of one of the few remaining relatively intact ecosystems in our nation.	FWS-R6-ES-2016-0042-0028	
I do not think that they need to continue to be on the list as this could hinder actual endangered species from getting help.	304				Delisting	I support removing the GYE population of Grizzly Bears from the list of Endangered and Threatened Wildlife. After reviewing further information posted by the National Park Service website, it is clear that the grizzly bears population is not longer declining but instead flourishing. The bears are now expanding into new habitats as they are reproducing so quickly in all areas of the park. I do not think that they need to continue to be on the list as this could hinder actual endangered species from getting help. The Federal List of Endangered and Threatened Wildlife should be constantly reviewed like it is in this proposed rule so that the animal populations who need help get it.	FWS-R6-ES-2016-0042-0033	

Just look at Wyoming and Montana with their management of bison and wolves - all to appease the livestock industry with their unproven, not-science-based accusations and to add money to the dwindling wildlife management coffers.	303	301			Delisting	Delisting = death Letting states "manage" our national wildlife is a sure death sentence. Just look at Wyoming and Montana with their management of bison and wolves - all to appease the livestock industry with their unproven, not-science-based accusations and to add money to the dwindling wildlife management coffers. Bison, wolf and grizzly populations are slow to rebound and are no where near carrying capacity in their historic ranges yet. Say NO to delisting NOW.	FWS-R6-ES-2016-0042-0061	
As an American Citizen who values nature and wildlife I am appalled that you continue to permit the killing of Wolves, Bison, and other predators in the states of Idaho, Wyoming, Montana and in and around Yellowstone Park. Don't you realize that people come to that park and to those states to see wildlife in their natural settings?	302				Delisting	As an American Citizen who values nature and wildlife I am appalled that you continue to permit the killing of Wolves, Bison, and other predators in the states of Idaho, Wyoming, Montana and in and around Yellowstone Park. Don't you realize that people come to that park and to those states to see wildlife in their natural settings? Don't you realize that tourism to Yellowstone Park, other wildlife preserves will dwindle to a trickle if there is no wildlife to be seen other than some birds,squirrels, marmots etc.? Your job I thought was to preserve wildlife-not sanction its decimation by "trophy" hunters, trappers, people who shoot from the air and put poison in dens, people who slaughter our last remaining pure herd of Bison, and now have bears in their sights-Please stop killing the animals, please stop people who have "other interests" from killing animals for their supposed harm to cattle-people don't go to parks and wildlife areas and public lands to see cattle-we go to see Bison, Wolves, Bears, Cougars, Bighorn Sheep, Antelope, Elk, even coyotes-all animals are precious and need to be saved-Please preserve these animals and put them back on the endangered list, and please stop permitting hunting.	FWS-R6-ES-2016-0042-0068	

I fully support the removal of the Greater Yellowstone ecosystem population of grizzly bears from the federal list of endangered and threatened wildlife. We must have science-based conservation, and the science has shown this population is recovered and the ecosystem is at carrying capacity. The recovery of this bear has been a huge success. The predetermined Recovery Criterion has been met and everything has been done to justify a delisting of this bear. It is time the state manages the species for sustainability.	304				Delisting	I fully support the removal of the Greater Yellowstone ecosystem population of grizzly bears from the federal list of endangered and threatened wildlife. We must have science-based conservation, and the science has shown this population is recovered and the ecosystem is at carrying capacity. The recovery of this bear has been a huge success. The predetermined Recovery Criterion has been met and everything has been done to justify a delisting of this bear. It is time the state manages the species for sustainability.	FWS-R6-ES-2016-0042-0055	
The Grizzly is long overdue for delisting. It is crucial that Grizzlies re-learn to fear man, to minimize man-bear contact, and limited hunting will accomplish this. Bear populations are also outgrowing habitat, and conflicting with wolves and other large predators. The Grizzly has been left on the ESL far too long, under the illusion of protection, but the result is actually hurting the overall health of Griz populations.	304				Delisting	The Grizzly is long overdue for delisting. It is crucial that Grizzlies re-learn to fear man, to minimize man-bear contact, and limited hunting will accomplish this. Bear populations are also outgrowing habitat, and conflicting with wolves and other large predators. The Grizzly has been left on the ESL far too long, under the illusion of protection, but the result is actually hurting the overall health of Griz populations.	FWS-R6-ES-2016-0042-0072	

I fully support removing the greater Yellowstone ecosystem population of grizzly bears from the list for both practical reasons of coexisting with bears and from a biological standpoint. Without going in to regurgitating data to support my statement I will just say I know that the professional biologists from USFWS would not make such a proposal if there were not sufficient evidence to warrant doing so.	304				Delisting	I fully support removing the greater Yellowstone ecosystem population of grizzly bears from the list for both practical reasons of coexisting with bears and from a biological standpoint. Without going in to regurgitating data to support my statement I will just say I know that the professional biologists from USFWS would not make such a proposal if there were not sufficient evidence to warrant doing so. I also know that the states involved are fully capable of managing the bears without risk of taking a step backward in terms of maintaining a viable population in the Yellowstone ecosystem or achieving recovery in other ecosystems. As far as concerns about the bears becoming genetically isolated first of all I would point out that a slight reduction of bears (If there even is) within the Yellowstone ecosystem is not going to have any affect. I would think genetic diversity within the Yellowstone ecosystem relies on transient animals from other ecosystems arriving in the Yellowstone ecosystem, keeping in mind that these transient animals will still be fully protected until their arrival I believe the delisting would have almost no affect in this regard. Having lived in close proximity to grizzlies from other ecosystems all my life I find it abundantly evident that they are recovering and dispersing and have no doubts genetic diversity is not in any danger from the proposed rule, if anything perhaps a slight reduction in the Yellowstone population may be beneficial in this regard as it would make room for transient animals to establish territories and eventually interbreed with the existing population. Knowing many people who live and recreate in the Yellowstone ecosystem I am shocked at how many tell me about frequent encounters with these bears. I am convinced the reason that the bears so commonly show little or no fear of humans is that management policies have prohibited people from engaging in activities which discourage bears from interaction with humans, including defense of life and property in all but the most dire of circumstances. Bears are very capable of learning from their experiences and I believe their behavior will change in a positive way resulting in less conflict if the proposed rule is adapted, this will be good for the bears in the long term, if sows teach their young to avoid humans rather than being indifferent to them, or worse yet seeking them out, more cubs will survive. While on the subject of cub survival I would also like to point out that if regulated hunting was established in any portion of the ecosystem it also has the potential of benefiting overall cub survival rates as well by reducing the number of mature boars which are known to kill cubs given the opportunity, in addition to helping restore a healthy fear of humans in all the bears. In reality state regulated hunting would provide funds for conservation efforts and create a better public.	FWS-R6-ES-2016-0042-0075	
Financially the proposed rule has many benefits both for government agencies as well as citizens. Federal managers would no longer be tasked with providing protection to a population segment that quite frankly has no more room to grow. State managers would no longer be tasked with monitoring a population they are forbidden from managing as a resource. Private citizens could potentially benefit in many ways including less loss of personal property and perhaps even revenue generated by regulated hunting.	304				Delisting	I fully support removing the greater Yellowstone ecosystem population of grizzly bears from the list for both practical reasons of coexisting with bears and from a biological standpoint. Without going in to regurgitating data to support my statement I will just say I know that the professional biologists from USFWS would not make such a proposal if there were not sufficient evidence to warrant doing so. I also know that the states involved are fully capable of managing the bears without risk of taking a step backward in terms of maintaining a viable population in the Yellowstone ecosystem or achieving recovery in other ecosystems. As far as concerns about the bears becoming genetically isolated first of all I would point out that a slight reduction of bears (If there even is) within the Yellowstone ecosystem is not going to have any affect. I would think genetic diversity within the Yellowstone ecosystem relies on transient animals from other ecosystems arriving in the Yellowstone ecosystem, keeping in mind that these transient animals will still be fully protected until their arrival I believe the delisting would have almost no affect in this regard. Having lived in close proximity to grizzlies from other ecosystems all my life I find it abundantly evident that they are recovering and dispersing and have no doubts genetic diversity is not in any danger from the proposed rule, if anything perhaps a slight reduction in the Yellowstone population may be beneficial in this regard as it would make room for transient animals to establish territories and eventually interbreed with the existing population. Knowing many people who live and recreate in the Yellowstone ecosystem I am shocked at how many tell me about frequent encounters with these bears. I am convinced the reason that the bears so commonly show little or no fear of humans is that management policies have prohibited people from engaging in activities which discourage bears from interaction with humans, including defense of life and property in all but the most dire of circumstances. Bears are very capable of learning from their experiences and I believe their behavior will change in a positive way resulting in less conflict if the proposed rule is adapted, this will be good for the bears in the long term, if sows teach their young to avoid humans rather than being indifferent to them, or worse yet seeking them out, more cubs will survive. While on the subject of cub survival I would also like to point out that if regulated hunting was established in any portion of the ecosystem it also has the potential of benefiting overall cub survival rates as well by reducing the number of mature boars which are known to kill cubs given the opportunity, in addition to helping restore a healthy fear of humans in all the bears. In reality state regulated hunting would provide funds for conservation efforts and create a better public.	FWS-R6-ES-2016-0042-0075	

I believe that regardless of what biological evidence is produced to show that the recovery has been successful there will always be a certain group of activist minded people and organizations who will oppose delisting. This can be clearly seen when looking at recent efforts by activist groups on behalf of protecting wolves, the wolf story is one of rapid re-population of an enormous area, their ability to reproduce has been documented on an unprecedented scale, however the cries from activists continue. On that note I encourage the USFWS to move forward with the proposed rule, there will always be those who are opposed to such proposals on a philosophical level but the ESA was not established to further philosophies. The criteria for delisting has been met and in my eyes failing to act upon it would be nothing short of negligent.	304				Delisting	I fully support removing the greater Yellowstone ecosystem population of grizzly bears from the list for both practical reasons of coexisting with bears and from a biological standpoint. Without going in to regurgitating data to support my statement I will just say I know that the professional biologists from USFWS would not make such a proposal if there were not sufficient evidence to warrant doing so. I also know that the states involved are fully capable of managing the bears without risk of taking a step backward in terms of maintaining a viable population in the Yellowstone ecosystem or achieving recovery in other ecosystems. As far as concerns about the bears becoming genetically isolated first of all I would point out that a slight reduction of bears (If there even is) within the Yellowstone ecosystem is not going to have any affect. I would think genetic diversity within the Yellowstone ecosystem relies on transient animals from other ecosystems arriving in the Yellowstone ecosystem, keeping in mind that these transient animals will still be fully protected until their arrival I believe the delisting would have almost no affect in this regard. Having lived in close proximity to grizzlies from other ecosystems all my life I find it abundantly evident that they are recovering and dispersing and have no doubts genetic diversity is not in any danger from the proposed rule, if anything perhaps a slight reduction in the Yellowstone population may be beneficial in this regard as it would make room for transient animals to establish territories and eventually interbreed with the existing population. Knowing many people who live and recreate in the Yellowstone ecosystem I am shocked at how many tell me about frequent encounters with these bears. I am convinced the reason that the bears so commonly show little or no fear of humans is that management policies have prohibited people from engaging in activities which discourage bears from interaction with humans, including defense of life and property in all but the most dire of circumstances. Bears are very capable of learning from their experiences and I believe their behavior will change in a positive way resulting in less conflict if the proposed rule is adapted, this will be good for the bears in the long term, if sows teach their young to avoid humans rather than being indifferent to them, or worse yet seeking them out, more cubs will survive. While on the subject of cub survival I would also like to point out that if regulated hunting was established in any portion of the ecosystem it also has the potential of benefiting overall cub survival rates as well by reducing the number of mature boars which are known to kill cubs given the opportunity, in addition to helping restore a healthy fear of humans in all the bears. In reality state regulated hunting would provide funds for conservation efforts and create a better public	FWS-R6-ES-2016-0042-0075	
Science and sound biology have confirmed that the Yellowstone grizzly has recovered sufficiently to be removed from the endangered species list.	304				Delisting	Science and sound biology have confirmed that the Yellowstone grizzly has recovered sufficiently to be removed from the endangered species list. This is the correct decision and can be carefully managed by the western states. Human emotion cannot be allowed to overrule this critical decision.	FWS-R6-ES-2016-0042-0130	

Human emotion cannot be allowed to overrule this critical decision.	304				Delisting	Science and sound biology have confirmed that the Yellowstone grizzly has recovered sufficiently to be removed from the endangered species list. This is the correct decision and can be carefully managed by the western states. Human emotion cannot be allowed to overrule this critical decision.	FWS-R6-ES-2016-0042-0130	
It's time to base our wildlife management decisions on the actual biological impact to the ecosystem, not on who has the loudest voice or best attorneys.	303				Delisting	It's time to base our wildlife management decisions on the actual biological impact to the ecosystem, not on who has the loudest voice or best attorneys. Based on all serious evaluations, the Greater Yellowstone Ecosystem Population of Grizzly Bears has recovered and should be delisted.	FWS-R6-ES-2016-0042-0135	

Delisting Grizzly Bears is counterproductive and wrong. The ESA is not meant to recover an animal only to turn around and be killed....and to say Grizzlies have recovered is not following science. The decision is based on small interest groups. Science needs to lead in matters of wildlife. I do not support this decision. I do not support wildlife losing their homes to ranchers. The NW terrain is not suitable for introducing a non native domestic species. Wildlife should not be paying with their lives for ranchers inability to choose proper suitable locations to do business. Grazing domestic animals in the wilderness alone and unattended with absolutely no skills on how to act or react like a wild animal is cruel. Location is the key to any business, picking predator territory is lazy and entitled. Especially knowing they will be compensated for livestock lost to these predators they dangle their livestock in front of..... Keep grizzlies listed, give us back our public lands and kick ranchers out.	303	302	301		Delisting	Delisting Grizzly Bears is counterproductive and wrong. The ESA is not meant to recover an animal only to turn around and be killed....and to say Grizzlies have recovered is not following science. The decision is based on small interest groups. Science needs to lead in matters of wildlife. I do not support this decision. I do not support wildlife losing their homes to ranchers. The NW terrain is not suitable for introducing a non native domestic species. Wildlife should not be paying with their lives for ranchers inability to choose proper suitable locations to do business. Grazing domestic animals in the wilderness alone and unattended with absolutely no skills on how to act or react like a wild animal is cruel. Location is the key to any business, picking predator territory is lazy and entitled. Especially knowing they will be compensated for livestock lost to these predators they dangle their livestock in front of..... Keep grizzlies listed, give us back our public lands and kick ranchers out.	FWS-R6-ES-2016-0042-0224	
By not transferring the Grizzly bear to the state(s) for management in how they see fit (as long as they maintain the agreed upon population size), the grizzly bear project is dragging down and preventing other successful opportunities under the endangered and threatened system.	304				Delisting	Yes the Grizzly bear should be removed off the endangered/threatened list for the greater Yellowstone area. The goal of the system has been met/exceeded so management of the grizzly bear needs to be transferred to the State(s). By not transferring the Grizzly bear to the state(s) for management in how they see fit (as long as they maintain the agreed upon population size), the grizzly bear project is dragging down and preventing other successful opportunities under the endangered and threatened system. Please use scientific goals/reasons to delist and NOT liberal Disney character philosophy to keep the grizzly on the list. Thanks, Brian	FWS-R6-ES-2016-0042-0246	

We killed all the bears in the UK because we thought we didn't need them and the farmers didn't want them. Now we don't have the choice to reintroduce them and our lives are all the poorer for it, so is the ecosystem. What is the point in correcting the wrong that humans have done in the first place, repopulate an area with its natural inhabitants, enjoy the revenue these animals bring with them, marvel at their existence, admire their beauty, tenacity, grace and skills for survival, only to hunt them down years later because they were successful at reclaiming a part of the planet that was theirs in the first place?	302	303	301		Delisting	Just stop shooting everything in the US, just because you can! We certainly won't spend our hard earned money visiting your part of the world if you start shooting and trapping bears as well as wolves! We killed all the bears in the UK because we thought we didn't need them and the farmers didn't want them. Now we don't have the choice to reintroduce them and our lives are all the poorer for it, so is the ecosystem. What is the point in correcting the wrong that humans have done in the first place, repopulate an area with its natural inhabitants, enjoy the revenue these animals bring with them, marvel at their existence, admire their beauty, tenacity, grace and skills for survival, only to hunt them down years later because they were successful at reclaiming a part of the planet that was theirs in the first place? It's madness. Having stayed in and around Yellowstone National Park for 6 weeks, we didn't meet one resident that thought bears were an issue, but then wolves aren't either but they too get shot for sport. Thank heavens we have grown up here in the UK and have stopped all forms of hunting for sport or pleasure and you know what, we aren't overrun with foxes or sickly rabbits as predicted. The bear population will only increase whilst there is enough food, nature will make the alterations herself, without any human intervention.	FWS-R6-ES-2016-0042-0220	
I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor.	302	301			Delisting	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	

Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology.	303				Delisting	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	
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Viewing live grizzlies is an economic boon to areas that are lucky enough to have them. Allowing trophy hunting will take these viewing opportunities away. A trophy hunter killing a grizzly takes away from everyone the opportunity to see that grizzly ever again. A person who instead views live grizzlies, not only stimulates the local economy, but perpetuates that opportunity for others to have the same viewing experience - in my mind, it should be a no-brainer on what is the morally, ethically, and economically correct thing to do.	302	301	303		Delisting	I respectfully urge you to not remove grizzly bears from the Endangered Species List. Trophy hunting is not the answer to management. These magnificent icons of American wilderness have recovered to less than 10% of their original habitat - how can that be considered recovered? Grizzly bears do not reproduce quickly, so any assault on their tenuous population could very well result in total extinction. These highly intelligent, sentient beings deserve better. They are apex predators that have a huge impact on a healthy ecosystem. Viewing live grizzlies is an economic boon to areas that are lucky enough to have them. Allowing trophy hunting will take these viewing opportunities away. A trophy hunter killing a grizzly takes away from everyone the opportunity to see that grizzly ever again. A person who instead views live grizzlies, not only stimulates the local economy, but perpetuates that opportunity for others to have the same viewing experience - in my mind, it should be a no-brainer on what is the morally, ethically, and economically correct thing to do. Please don't cave to the extreme, anti-wildlife special interest groups. The majority of Americans do not want grizzly bears de-listed. In a democratic society, the majority should rule, and in this case the majority would like to see the grizzly bear protected.	FWS-R6-ES-2016-0042-0315	
In addition, delisting of the grizzly would allow sport hunting of the grizzly bear, something that we simply cannot tolerate of this precious and sacred animal.	302				Delisting	I am against delisting of the Yellowstone Grizzly Bear population. Although the grizzly in this particular location has recovered and reached a stable if static population, the bear continues to face many threats to its long term survival- food shortages being one of them. In addition, delisting of the grizzly would allow sport hunting of the grizzly bear, something that we simply cannot tolerate of this precious and sacred animal. I believe this may be an example where the "facts" are misleading us to a false sense of security for this animal. Please do not delist the grizzly.	FWS-R6-ES-2016-0042-0321	

The gene pool is not extensive enough to start this slaughter , have we not murdered enough buffalo , wolves ,coyotes to satisfy the blood lust of trappers murdering trophy hunters of our wildlife ? This is the wrong direction for these sacred animals !	301	302			Delisting	This is a disastrous plan as we all know the bloodthirsty States like Idaho will kill every bear they can find baiting and luring them out of the park ! People travel to see these magnificent animals from all over the world ! The gene pool is not extensive enough to start this slaughter , have we not murdered enough buffalo , wolves ,coyotes to satisfy the blood lust of trappers murdering trophy hunters of our wildlife ? This is the wrong direction for these sacred animals !	FWS-R6-ES-2016-0042-0330	
How could you release management of this iconic species to the states that forced the USFWS to list them in the first place under the Endangered Species Act? Look what happened to the gray wolf when it was delisted in 2012; the governing body of Wyoming allowed wolves to be shot on sight and just like that years of careful conservation efforts were setback decades. The status of the grizzly bear indirectly protects other species as the ESA safeguards the habitat of not only the grizzly but every other creature who lives alongside it. I can also point to the fact that two major food sources the grizzly bear relies on have drastically plummeted. Whitebark pine seeds and cutthroat trout do not command the numbers they must in order for grizzlies to not go into human inhabited areas and search out alternative food sources, increasing their risk of being shot. Whitebark pine is in fact listed as endangered by the International Union for the Conservation of Nature. I understand the USFWS is looking for a success story. I would argue you have already found some in the American alligator, the black footed ferret, the whooping crane, and the California condor. There is no reason to sully what you have done for the grizzly bear by doing something as rash as depriving them of federal protection. Don't give Wyoming, Idaho, and Montana the power to decide this bear's fate; they will choose poorly as they have done historically and then you will be taken as fools, fools which you are not because the USFWS has done so much to protect wild animals and their habitats and must continue to do just that.I thank you for your consideration of my comment, I really do. As a senior in high school it is my hope that one day I can bring as much passion to my future pursuits in the environmental field as you have and protect the natural world in perpetuity from the ever increasing perils of our modern world. Again, thank you for taking my comment and for all that you do.Regards, --Tom Kilian	303	302	301		Delisting	As a concerned citizen I would like to voice my concern about the USFWS's proposed delisting of the Yellowstone grizzly bears. How could you release management of this iconic species to the states that forced the USFWS to list them in the first place under the Endangered Species Act? Look what happened to the gray wolf when it was delisted in 2012; the governing body of Wyoming allowed wolves to be shot on sight and just like that years of careful conservation efforts were setback decades. The status of the grizzly bear indirectly protects other species as the ESA safeguards the habitat of not only the grizzly but every other creature who lives alongside it. I can also point to the fact that two major food sources the grizzly bear relies on have drastically plummeted. Whitebark pine seeds and cutthroat trout do not command the numbers they must in order for grizzlies to not go into human inhabited areas and search out alternative food sources, increasing their risk of being shot. Whitebark pine is in fact listed as endangered by the International Union for the Conservation of Nature. I understand the USFWS is looking for a success story. I would argue you have already found some in the American alligator, the black footed ferret, the whooping crane, and the California condor. There is no reason to sully what you have done for the grizzly bear by doing something as rash as depriving them of federal protection. Don't give Wyoming, Idaho, and Montana the power to decide this bear's fate; they will choose poorly as they have done historically and then you will be taken as fools, fools which you are not because the USFWS has done so much to protect wild animals and their habitats and must continue to do just that. I thank you for your consideration of my comment, I really do. As a senior in high school it is my hope that one day I can bring as much passion to my future pursuits in the environmental field as you have and protect the natural world in perpetuity from the ever increasing perils of our modern world. Again, thank you for taking my comment and for all that you do. Regards, --Tom Kilian	FWS-R6-ES-2016-0042-0324	

As soon as their Endangered Species protection is removed, I fear that these iconic bears will be hunted mercilessly for their coats, paws, a noble head to mount on a hunter's wall or the animal's entire carcass to be preserved/taxidermy and displayed at a hunting lodge for bragging rights. Meanwhile, in the forest, orphaned cubs will die of starvation or, not having finished learning the lessons of how to be a "good bear" in a national park from its mother--i.e., which animals are food (elk, deer, vermin, berries, etc) and which are threat (humans), will become a danger to people and, ultimately, themselves. Left to their own devices, Grizzly bears typically prefer to avoid dangerous encounters with any rival predator. If humans become their #1 enemy again, be sure that their natural prey will suffer, too: overpopulation, explosion of disease that the predators would have controlled, and compromise in the genetic strength of the herds. When the Grizzly is no longer around to fell the weaker members of the species, any animal will have a greater chance of breeding, not just the strongest and fittest members.	301				Delisting	Grizzly bears are an important species, and their species population has not rebounded so much that they can long survive being removed from the list of Endangered and Threatened Wildlife. Just a couple weeks ago, I submitted a comment to protest the slaughter of Yellowstone Bison. Apparently, the Forest Service thought it was necessary to cull the species population to prevent the spread of a bovine virus that could infect domestic cattle grazing nearby. If there was truly a "healthy" size/population of Grizzly bears in the park, that cull would not have been needed. These and other apex predators (such as wolves, cougars, etc.) naturally hunt weakened prey animals such as the sick/infected bison. The bears help to maintain a healthy population balance between predator and prey species. As soon as their Endangered Species protection is removed, I fear that these iconic bears will be hunted mercilessly for their coats, paws, a noble head to mount on a hunter's wall or the animal's entire carcass to be preserved/taxidermy and displayed at a hunting lodge for bragging rights. Meanwhile, in the forest, orphaned cubs will die of starvation or, not having finished learning the lessons of how to be a "good bear" in a national park from its mother--i.e., which animals are food (elk, deer, vermin, berries, etc) and which are threat (humans), will become a danger to people and, ultimately, themselves. Left to their own devices, Grizzly bears typically prefer to avoid dangerous encounters with any rival predator. If humans become their #1 enemy again, be sure that their natural prey will suffer, too: overpopulation, explosion of disease that the predators would have controlled, and compromise in the genetic strength of the herds. When the Grizzly is no longer around to fell the weaker members of the species, any animal will have a greater chance of breeding, not just the strongest and fittest members. Please, please re-think your proposal to remove the protected status of these bears.	FWS-R6-ES-2016-0042-0349	
It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned.	303				Delisting	The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range This is being considered for the benefit of trophy hunters and is not based on the science above or any consideration for the safety of the grizzly population. I implore you to consider not hunting them because of the reasons listed above and many more.	FWS-R6-ES-2016-0042-0387	

While the species might have reached population numbers which warrant delisting, this species is far from being on the road to permanent recovery. The science points to many obstacles which will prevent this species from thriving once removed from the ESA.	301				Delisting	I am writing today to express my concerns about the delisting of the Grizzly Bear (<i>Ursus arctos horribilis</i>) from the Endangered Species Act (ESA). While the species might have reached population numbers which warrant delisting, this species is far from being on the road to permanent recovery. The science points to many obstacles which will prevent this species from thriving once removed from the ESA. From human development and conflicts (loss of habitat), to declining numbers of White Bark Pine and cutthroat trout, the species has a number of challenges facing it. In 2015, close to 10% of the total population was euthanized due to conflicts with human. It does not take a PhD to understand that at this rate, in just 10 years, the species would be extinct. As an individual who is employed in the conservation and protection field, all too often I personally witness careless individuals recreating in grizzly habitat who leave food and other odorous items well within the reach of bears. This lack of care by these individuals will only serve to create additional habituated bears which will need to be destroyed, thus further decreasing the population. The US Government has spent millions of dollars to protect and grow this population of bears, and now seem to want to throw that investment away. This is an unwise use of tax dollars. A recent survey indicated that 81% of visitors to the Greater Yellowstone Ecosystem want to see a bear. This data indicates that people vacationing come to Wyoming, and spend thousands of dollars per visit, with the hopes of seeing a bear. With a declining population due to delisting, less people will be afforded the opportunity to see a bear. As the population numbers further decline, one would expect less tourists to visit, resulting in less tourism dollars funneling into an already cash strapped state. In 2015, many of us got to see first hand what happens when an animal, well known by the public, is taken by a hunter. Cecil the Lion was hunted for nothing more than a trophy, in a similar way in which Grizzly Bears would be hunted should they be delisted. The public outcry was tremendous, resulting in the hunter nearly losing his dental practice due to the negative publicity. One must question if any of our elected public officials, outfitters, or local businesses are prepared for the type of public outcry which will happen if certain bears are killed by hunters. One outfitter in Jackson has been quoted as saying he wants bear 399's head on his wall. If the world's most famous Grizzly is allowed to be killed, simply out of spite and for a trophy, the repercussions on Wyoming's tourism industry will be great. I ask you to reconsider the implications of your decisions regarding the Grizzly Bear. This state can not afford for the tourism industry to suffer at the same time the oil industry has essentially gone bankrupt. If Wyoming keeps with it's anti predator	FWS-R6-ES-2016-0042-0451	
The USFWS own recovery plan does not demonstrate that the YEP of Grizzly bears is stable and has reached a point that release from the ESA is warranted. Release of the bears from protection would undoubtedly cause very high trophy hunting mortality in the surrounding states of Wyoming, Idaho, and Montana, as YEP bears forage in wider ranges, not knowing park protection boundaries.	301				Delisting	I have reviewed information concerning the delisting of Yellowstone's grizzly bears, and have reached the conclusion that there is not proof that the population of bears has grown to stable numbers. In fact, the bear seems to be in decline from stable growth, due to food source depletion and habitat deterioration, human interaction mortality, both accidental and illegal, and scarcity of cub success due to the above human and environmental interactions. The USFWS own recovery plan does not demonstrate that the YEP of Grizzly bears is stable and has reached a point that release from the ESA is warranted. Release of the bears from protection would undoubtedly cause very high trophy hunting mortality in the surrounding states of Wyoming, Idaho, and Montana, as YEP bears forage in wider ranges, not knowing park protection boundaries. Please do not remove grizzly bears from the federal list of endangered species. I am not a young tree hugger, but a grandfather, life NRA member, and an environmental hunter. I want my great-grandchildren to be able to see grizzly's in the wild.	FWS-R6-ES-2016-0042-0460	

For the Endangered Species Act to have validity and accomplish it's purpose, to protect those critically endangered animals, it has to be a two-way street. Animal species need to be placed on it when valid science has identified the species as being endangered, and they must be removed and the victory celebrated when the species has recovered to the target objectives. Without this, the Endangered Species Act loses it's credibility and the urgency of its mission is diluted by those highly controversial species.	304				Delisting	For the Endangered Species Act to have validity and accomplish it's purpose, to protect those critically endangered animals, it has to be a two-way street. Animal species need to be placed on it when valid science has identified the species as being endangered, and they must be removed and the victory celebrated when the species has recovered to the target objectives. Without this, the Endangered Species Act loses it's credibility and the urgency of its mission is diluted by those highly controversial species. In this vein, I support the de-listing of the grizzly bear, based on the facts scientific studies and objectives having been accomplished. The de-listing of the grizzly bear is not a death knell for the species, but is instead the triumphant victory horn of the Endangered Species Act accomplishing a great victory in helping an amazing species come back from the brink of extinction.	FWS-R6-ES-2016-0042-5021	
There is a irrational cultural hostility toward grizzlies in Wyoming, a state where public officials want to suppress recovery, even preventing bears from inhabiting remote federal public lands in the Yellowstone region because priority is given to non-native, taxpayer-subsidized private cattle.	303	301			Delisting	I completely OPPOSE delisting Yellowstone Grizzlies There is a irrational cultural hostility toward grizzlies in Wyoming, a state where public officials want to suppress recovery, even preventing bears from inhabiting remote federal public lands in the Yellowstone region because priority is given to non-native, taxpayer-subsidized private cattle. Grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary.	FWS-R6-ES-2016-0042-5032	

The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area.	301				Delisting	1. Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population. 2. Grizzly bears are not recovered across their historic range. 3. Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399, would be threatened by the delisting. The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "the reality is that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the Great Yellowstone Area. Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting. 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. Finally, I agree with Tom Poor Bear who concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations." Do not delist grizzly bears!	FWS-R6-ES-2016-0042-5023	
I am also opposed to the delisting and handing the grizzly bears over to the state of Wyoming for trophy hunting. I believe that is a terrible idea, not just because I am morally against trophy hunting but also because having lived in grizzly bear habitat for 36 years in Wyoming, I have spent every year of that cringing at the attitudes and actions of the state governments of Montana, Wyoming, and Idaho toward wildlife of all sorts, and predators in particular.	303	301	302		Delisting	My comment is that I oppose this action for several reasons. It is not so much which you say but all that you do not say. First of all, why the population count in 1975 was so low the bear needed listing. "The best available science" of that time resulted from a rapid closing of the garbage dumps in Yellowstone National Park which was NOT recommended and was warned against by scientists like the Craighead brothers, whose advice was ignored. It was a poor management decision, considering the abrupt population decline which required subsequent listing. Now you say the "best available science" indicates the population has recovered and is increasing, and that it is "safe", despite numerous indications of potential threats to them which cannot be mitigated, and you ignore scientists like Dave Mattson and others who clearly delineate these. I am also opposed to the delisting and handing the grizzly bears over to the state of Wyoming for trophy hunting. I believe that is a terrible idea, not just because I am morally against trophy hunting but also because having lived in grizzly bear habitat for 36 years in Wyoming, I have spent every year of that cringing at the attitudes and actions of the state governments of Montana, Wyoming, and Idaho toward wildlife of all sorts, and predators in particular. Let alone the trigger happy "haters" of bears and wolves. And these are states that host "wildlife killing contests"! Whether state government politicians capitulating to non wildlife interests and consumptive uses to keep themselves in office, or federal government employees motivated to declare a victory in grizzly bear recovery as a monument to themselves before they retire, there is a vested interest motivating the decision making to delist the Yellowstone grizzly bears. National Parks like Yellowstone and Grand Teton supposedly protect millions of acres against this human tendency to choose personal gain (i.e. real estate development, etc.) over wildlife protection and healthy populations. Stripping the Yellowstone ecosystem grizzly bears of endangered species protection is at best short sighted and quite frankly, planned murder. This isn't the time, the place, or the species to do it with. To me this is clearly motivated by politics, not science. Delisted bears will be vulnerable to trophy hunting—that we can agree on—by short sighted politicians looking at a few dollars from the hunts and ignoring the millions in grizzly bear driven tourism that the states are benefitting from. Surely the grizzly bear deserves better than a future as a trophy head hanging over the fireplace or rug on the floor, feeding not the body but the ego. For this will be the sad legacy of the decision makers who allow or cause this to happen.	FWS-R6-ES-2016-0042-0481	

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I fear overhunting will cause the bears to be forced back onto this list or, even worse, they reduce in such a great number that the species cannot be saved.	301				Delisting	I am extremely skeptical of the possible impacts this could have. I fear overhunting will cause the bears to be forced back onto this list or, even worse, they reduce in such a great number that the species cannot be saved. If the grizzly bears are becoming a huge problem for residents, tourists, and businesses, then I would support their removal from the list. I would need to see more data regarding grizzly bear interaction with humans to support this. As I said, I fear what would happen if we are too quick to remove them from the list.	FWS-R6-ES-2016-0042-0509	

"For the long-term viability of the Endangered Species Act, which is a powerful conservation tool, it needs to function as it was intended. It should not be used as a weapon to save some peoples' favorite animals from any possibility of human exploitation". Steven Rinella	303				Delisting	"For the long-term viability of the Endangered Species Act, which is a powerful conservation tool, it needs to function as it was intended. It should not be used as a weapon to save some peoples' favorite animals from any possibility of human exploitation". Steven Rinella Currently GYE Grizzly bears are at or near the carrying capacity for the area, leaving them on the Endangered Species List will only cause the use/waste of more tax dollars to relocate and protect these Grizzlies, not to mention the harm that will come to other large and small fauna. This plan only includes the GYE Grizzlies therefore allowing continued protection of land and resources to protect and growth of Grizzlies in other lower 48 regions. Freeing up the tax dollars to be better spent on these efforts as opposed to 'wasting' those dollars protecting a population that has already recovered beyond what the Endangered Species Act requires. The Federal Government will have to first approve each state's management plan and thereby still maintains control or the GYE Grizzlies. Looking at the success with which the wolf recovery program has had should be a shining beacon as to how well the State's and Federal Government can work together to both provide protection to as well as control of any species looking to become delisted.	FWS-R6-ES-2016-0042-5058	
Only 20-26% of people surveyed have supported delisting or hunting seasons and the rates are lower in the local area.	303				Delisting	It's misleading to give the doubling of this population as an indicator if its stability. That doubling was the growth from 2% of the number in existence for tens of thousands of years and then reduced by 98% in less than one hundred years by sport hunting, nearly decimated twice, to 4%. And that growth was a result if FWS efforts. Why would the FWS put the results of that work in jeopardy by allowing same practice that nearly brought the grizzly to extinction in the last century? "Fool me once..." It's like a contractor offering a long dormant group of arsonists the opportunity to keep burning a house that they once nearly destroyed and he hasn't quite repaired. Sport hunters aren't criminals, but it is a destructive practice that depletes a population much faster than government efforts can rebuild them. FWS' works shouldn't be squandered like this. Only 20-26% of people surveyed have supported delisting or hunting seasons and the rates are lower in the local area. 50 Native governments have sent formal documents announcing their opposition to the delisting. There is no popular support for delisting. The tourism benefit of bringing into GYE sport hunters is so small compared to the loss of non-hunting tourists, as all of them now are, for whom the chance of seeing wildlife is such an important part of the park's appeal. For every one person who could shoot a given grizzly, fifty could have the experience if crossing its path, or seeing it through a telescope, finding its scat on a trail, or seeing the unbelievably high scratchings on a tree. Those are all memorable, maybe beautiful, maybe exhilarating or even terrifying experiences that make lifelong impressions and are taken away from a tourist, park ranger, local resident, and the whole ecosystem when a bear is killed. The potential tourism growth is outweighed by the potential loss, people don't support this, at all, and it doesn't make sense to hand the small recovery the GYE ecosystem has made straight back to the interests that recklessly inflicted the injury it's currently nursing, no matter how slow or carefully.	FWS-R6-ES-2016-0042-5067	

It has taken 40 years of protections to get where we are today, lifting protections prematurely sets great risk and consequence for long term survival of the species; add to that a pending "trophy" hunt will insure the grizzly population to decline back towards extinction within a very short period of time. Finally, tourism to Yellowstone National Park, brings in millions of annually. Delisting the iconic grizzly bear which people come from all over the globe to see, sets a negative tone, dangerous precedence, and puts that tourism in jeopardy.	301	302			Delisting	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is: the proposed "trophy" hunt can take place just barely	FWS-R6-ES-2016-0042-0463	
The Federal Government will have to first approve each state's management plan and thereby still maintains control or the GYE Grizzlies. Looking at the success with which the wolf recovery program has had should be a shining beacon as to how well the State's and Federal Government can work together to both provide protection to as well as control of any species looking to become delisted.	303				Delisting	"For the long-term viability of the Endangered Species Act, which is a powerful conservation tool, it needs to function as it was intended. It should not be used as a weapon to save some peoples' favorite animals from any possibility of human exploitation". Steven Rinella. Currently GYE Grizzly bears are at or near the carrying capacity for the area, leaving them on the Endangered Species List will only cause the use/waste of more tax dollars to relocate and protect these Grizzlies, not to mention the harm that will come to other large and small fauna. This plan only includes the GYE Grizzlies therefore allowing continued protection of land and resources to protect and growth of Grizzlies in other lower 48 regions. Freeing up the tax dollars to be better spent on these efforts as opposed to 'wasting' those dollars protecting a population that has already recovered beyond what the Endangered Species Act requires. The Federal Government will have to first approve each state's management plan and thereby still maintains control or the GYE Grizzlies. Looking at the success with which the wolf recovery program has had should be a shining beacon as to how well the State's and Federal Government can work together to both provide protection to as well as control of any species looking to become delisted.	FWS-R6-ES-2016-0042-5058	

MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it.	302				Delisting This is not even close to the time where Grizzly Bears should be delisted. Here are several reasons why I believe this is a wrong decision. 1- STATE MANAGEMENT SOURCES ARE HOSTILE AND JEOPARDIZE SPECIES SURVIVAL. These states, Wyoming, Montana and Idaho, have shown themselves to be incredibly hostile toward predators and are politically in bed with the ranchers and hunters. They fail to see the value of the Grizzly Bears just as they are as a tool to draw tourists into the Greater Yellowstone Eco System and believe they can make more money with \$50 to \$100.00 hunting licenses over millions and millions of tourists being drawn to the area to hopefully see a Grizzly. . Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. 2-- BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. 3- MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. Please consider these issues closely before making a final decision. My hope is that the Grizzlies remain on the ESA for many years to come, as this is not the time to delist. But, if the final decision is to delist, I would certainly hope you would consider expanding the boundaries of protection for the Grizzlies around the GYE 20-50 miles. These Grizzlies do wander outside of the park boundaries in search of food and for hibernation, which would subject them to being hunted. Thank you for your attention to this very important matter.	FWS-R6-ES-2016-0042-5097	
With delisting, the federal government will turn over grizzly management decisions outside of the park's boundaries to three states that will show no restraint in killing grizzlies. (Peacock, 2016) The Service has fiercely maintained that even if problems arise [under state management], it will not relist the population. Despite some laudatory language about co-existence with grizzly bears, the state grizzly bear management plans lack any binding commitments to do anything other than hunt bears. (Willcox, 2016)	303	301			Delisting We are adamantly against delisting the Greater Yellowstone Grizzly Bears from the Endangered and an Threatened Wildlife Species Act. An example as to why delisting of protected wildlife can be detrimental to a species has occurred with State management of the wolf population in Wyoming, Montana, and Idaho. Contest killings in both Montana and Idaho have occurred, which reflect the hatred that people have for "predator" species, and have been ignored by the States' FWS. The only certain outcome of delisting the Yellowstone grizzly bears is that it will result in trophy hunting. With delisting, the federal government will turn over grizzly management decisions outside of the park's boundaries to three states that will show no restraint in killing grizzlies. (Peacock, 2016) The Service has fiercely maintained that even if problems arise [under state management], it will not relist the population. Despite some laudatory language about co-existence with grizzly bears, the state grizzly bear management plans lack any binding commitments to do anything other than hunt bears. (Willcox, 2016) The growth of the grizzly population has leveled off; the current population estimate is down six percent from 2014. Mortality from all causes, as reported by the government, was 59 grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the bears that will be shot in the trophy hunt and you could easily approach 200 dead grizzlies in a single year. Even a population of 700 grizzly bears would be doomed to extinction by such heavy mortality. (Peacock, 2016) Even though the states may be somewhat cautious during the first five years of federal oversight that follows delisting, there is every reason to believe that, over time, state management will reverse the gains made over the last 40 years of endangered species protections. This is especially likely given the crisis that Yellowstone grizzly bears are facing now. During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably are dead. This totals over 90 bears, or more than 12% of the population. The primary factor affecting grizzly bears at both the individual and population level is excessive human-caused mortality. Regulating human-caused mortality through habitat management is an effective approach, as evidenced by increasing grizzly bear populations in the lower 48 States where motorized access standards exist (e.g., GYE and Northern Continental Divide Ecosystem).	FWS-R6-ES-2016-0042-5103	

In addition, I require an investigation into conflict of interest governing discussions and decisions for the proposed delisting of the grizzly bear. It appears that the Fish and Wildlife Service is in direct conflict with their requirement to protect wildlife and have now become a "captured agency" also known as "regulatory capture" in favor of big game trophy hunters. Regulatory capture is a form of political corruption that occurs when a regulatory agency, created to act in the public interest, instead advances the commercial or special concerns of interest groups that dominate the industry or sector it is charged with regulating. Regulatory capture is a form of government failure; it creates an opening for firms to behave in ways injurious to the public (e.g., producing negative externalities). The agencies are called "captured agencies".	303				Delisting	STOP the plans to remove the the greater Yellowstone Ecosystem Population of grizzly bears from the endangered and threatened wildlife listing. Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population. Grizzly bears are not recovered across their historic range. Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399, would be threatened by the delisting. In addition, I require an investigation into conflict of interest governing discussions and decisions for the proposed delisting of the grizzly bear. It appears that the Fish and Wildlife Service is in direct conflict with their requirement to protect wildlife and have now become a "captured agency" also known as "regulatory capture" in favor of big game trophy hunters. Regulatory capture is a form of political corruption that occurs when a regulatory agency, created to act in the public interest, instead advances the commercial or special concerns of interest groups that dominate the industry or sector it is charged with regulating. Regulatory capture is a form of government failure; it creates an opening for firms to behave in ways injurious to the public (e.g., producing negative externalities). The agencies are called "captured agencies".	FWS-R6-ES-2016-0042-5121	
Without this connectivity, genetic diversity cannot remain strong in the Yellowstone population. For this reason, we feel that it is too early to delist Grizzly Bears.	301				Delisting	To the U.S. Fish and Wildlife Service: I am writing for the board of directors of the North Fork Preservation Association to comment on the proposal to remove Grizzly Bears in the Greater Yellowstone Ecosystem from the Federal List of endangered and threatened wildlife. Our community on the North Fork of the Flathead River in Northwest Montana, sitting just below the U.S./Canadian border next to Glacier National Park is one of the most ecologically diverse regions in North America. We also have the highest population of Grizzly Bears in the lower 48 states. Surrounded by public land and wildlife habitat, we have learned to live peacefully in the Grizzly country. We value these bears and have enjoyed watching their numbers grow over the last few decades. The conservation efforts that have been deployed to encourage the Grizzly Bears recovery have been a great success. However, these efforts should be continued until Grizzly populations are connected over the entire landscape between Yellowstone and the Yukon. Isolated populations do not do well over the long run. Grizzly Bears need to be allowed to roam freely through all areas with suitable habitat. The Yellowstone grizzly bear population is an isolated population. There is very little evidence that Grizzly Bears from Yellowstone travel to other Grizzly Bear populations to the north. Without this connectivity, genetic diversity cannot remain strong in the Yellowstone population. For this reason, we feel that it is too early to delist Grizzly Bears. We also disagree with trophy hunting grizzly bears. It has taken many decades and millions of our tax dollars to change the trend toward extinction and hunting these iconic creatures seems contrary to everything that we have achieved. In addition, the status of Grizzly Bears in the public mind has risen. Many visitors come to Montana and Wyoming hoping to see a Grizzly Bear. These bears are the heritage of all of the people in the U.S., not just those of us who live in Montana, Wyoming, or Idaho. Just from an economic viewpoint these Bears generate more income for Montana, Wyoming, and Idaho from visitors than will ever be realized from 10-50 annual Trophy Tags. There are many more people who want to see a grizzly bear than shoot one. There also needs to be adequate and continual funding for Bear conservation in place, including bear management personnel to deal with bear-people conflicts, before delisting happens. The loss of federal money for conservation efforts is a major concern regarding delisting. For these reasons, we oppose the delisting of Grizzly Bears at this time.	FWS-R6-ES-2016-0042-5128	

A leaked memo states that if the GYE grizzly bears are delisted, that they will open up trophy hunting seasons for grizzlies in Wyoming, Idaho and Montana which suggests that opening such seasons is a prime motivation for the states in pushing for de-listing.	303				Delisting	I am a veterinarian, a biologist and a concerned citizen and for the reasons stated below, it is my firm contention that grizzly bears should not be delisted in the Greater Yellowstone Ecosystem. Actual numbers of grizzly bears are merely estimates as are the numbers required to support a sustainable populations for one of the slowest-reproducing mammals in North America with female grizzlies giving birth only every three years, if conditions are right. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399 would be threatened by the delisting. FWS could well see more than 40 years of recovery efforts squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America.. By the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range and grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. The management of isolated populations of free-ranging carnivores like grizzly bears and wolves is flawed. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three	FWS-R6-ES-2016-0042-5116	
In addition to their utility value for preservation of biodiversity and to ecological systems as top predators, these animals have inherent existence value.	302				Delisting	I oppose de-listing the Grizzly Bear population of Yellowstone from the Federal List of Endangered and Threatened Wildlife. These iconic animals are still vulnerable, genetically isolated and will likely be intensely trophy-hunted. In addition to their utility value for preservation of biodiversity and to ecological systems as top predators, these animals have inherent existence value. As noted by top scientists, "Grizzly bears face multiple threats to persistence including the loss of their primary food resources. Currently, whitebark pine seeds, native cutthroat trout, huckleberries, army cutworm moths, elk and bison are either declining and/or are expected to decline in the foreseeable future as a result of habitat loss, climate change, drought, invasive species and other anthropogenic causes." Please do not de-list the Grizzly.	FWS-R6-ES-2016-0042-5160	

This document thoroughly discusses the history of the grizzly bear species, it's habitat, nutritional needs, and challenges to it's continued survival. It reviews the history of the recovery process and sites volumes of reports and analysis, by experts in the field, of the ongoing status of the grizzly. Recovery criteria were established and indeed met and maintained since 2004.	304				Delisting	I support delisting the GYE population of grizzly bears from the Federal List of Endangered and Threatened Wildlife. After a review of document FWS-R6-ES-2016-0042, Proposed Rule; Endangered and Threatened Species, Exports, Imports, Reporting and Recordkeeping Requirements, Transportation, I am convinced we can confidently move ahead with the de-listing. This document thoroughly discusses the history of the grizzly bear species, it's habitat, nutritional needs, and challenges to it's continued survival. It reviews the history of the recovery process and sites volumes of reports and analysis, by experts in the field, of the ongoing status of the grizzly. Recovery criteria were established and indeed met and maintained since 2004. As science has evolved and improved, so has our understanding of the important aspects of grizzly management. Also, based on the best scientific and commercial data available it is clear that the GYE grizzly bear population is discrete from other grizzly bear populations and significant to the remainder of the taxon and meets the definition of a DPS under the act. Regarding the issue of whitebark pine nuts, as part of the grizzly bear diet, I site the Food Synthesis Report (IGBST 2013). Grizzly Bears are extremely omnivorous and display great diet plasticity, shifting and switching food habits according to their availability. There are over 260 species of foods consumed by grizzly bears in the GYE. This ability to eat a wide variety of foods makes them a generalist species. After years of studies, new feeding strategies have continued to appear annually. While whitebark pine seed has been identified as one of the components of a grizzly bear's diet, which can indeed influence reproductive and survival rates. However, it has been revealed through study that there is no correlation between long term survival with a decline in whitebark pine availability. The report found that grizzly bear selection of white bark pine nuts had actually decreased between 2000 and 2011. Movement rates had not changed, as well as body size and condition during times of decreased availability of the nut. There continued to be a consistent litter size following poor white bark pine years. Nearly one third of grizzly bear home ranges in the GYE do not contain any whitebark pine. Grizzly bears have shown themselves to be very resilient and adaptable! Over the years, grizzly bear recovery has been developed, revised and modified according to new scientific studies, data and methods. The grizzly bear recovery story is truly one of success, that represents the hard work of many people, using the best science available. This will not end with the de-listing! In this proposed rule, if finalized, there is ongoing biological review of the status of the grizzly bears and detailed rules and parameters allowing for emergency re-listing if necessary. The 2016 Conservation Strategy identifies and	FWS-R6-ES-2016-0042-5171	
Grizzlies have one of the lowest reproductive rates of any land mammal; once the number of bear deaths outstrip the number of cubs born, the Yellowstone grizzly is on the road to extinction. (Peacock, 2015)	301				Delisting	I oppose delisting because delisting means that states which have shown themselves to be very unfriendly to predators will allow trophy hunting. These three states have already indicated as much - even though most Americans oppose trophy hunting of Yellowstone ecosystem's grizzly bears. One of the biggest problems is the lack of regulatory controls on grizzly bear mortality once delisting has occurred. With the lowest reproductive rate of any mammal in North America, grizzly bears cannot sustain many deaths, especially among adults. Most grizzlies die because people kill them, so controlling the rates at which we kill these animals is crucial. In fact, the ESA has been vital to reducing rates of human-caused grizzly bear mortality. (Willcox, 2016) The states of Montana, Idaho, and especially Wyoming exert huge pressures on the FWS to delist Yellowstone's grizzlies. Once delisted, the states will immediately sell trophy grizzly hunting permits for substantial amounts of money. (Peacock, 2014) Exactly how many hunting permits will be offered and how successful those hunts will be is unknown, but it is clear that an atmosphere will be created throughout the greater Yellowstone ecosystem where it is very easy to kill a grizzly for any reason. Grizzlies have one of the lowest reproductive rates of any land mammal; once the number of bear deaths outstrip the number of cubs born, the Yellowstone grizzly is on the road to extinction. (Peacock, 2015) The ESA represents the conscience of the broader public when it comes to grizzly bears and other imperiled species. By contrast, our state wildlife management agencies in the Northern Rockies represent the views of a politically influential minority whose interests focus on extractive uses of the natural world. State wildlife managers do not want to adopt binding restrictions because anything of this sort would put them at odds with their hunter constituency and their politically powerful masters in the energy and agriculture industries. (Willcox, 2016) I agree with Ms. Willcox. Your agency represents the American citizens - not just the fish and game departments of three states. American citizens do NOT want these bears delisted and they really do not want them hunted. Please listen to the science. Please listen to the citizens. Keep grizzly bears protected.	FWS-R6-ES-2016-0042-5161	

The ESA represents the conscience of the broader public when it comes to grizzly bears and other imperiled species. By contrast, our state wildlife management agencies in the Northern Rockies represent the views of a politically influential minority whose interests focus on extractive uses of the natural world. State wildlife managers do not want to adopt binding restrictions because anything of this sort would put them at odds with their hunter constituency and their politically powerful masters in the energy and agriculture industries. (Willcox, 2016)	304				Delisting	I oppose delisting because delisting means that states which have shown themselves to be very unfriendly to predators will allow trophy hunting. These three states have already indicated as much - even though most Americans oppose trophy hunting of Yellowstone ecosystem's grizzly bears. One of the biggest problems is the lack of regulatory controls on grizzly bear mortality once delisting has occurred. With the lowest reproductive rate of any mammal in North America, grizzly bears cannot sustain many deaths, especially among adults. Most grizzlies die because people kill them, so controlling the rates at which we kill these animals is crucial. In fact, the ESA has been vital to reducing rates of human-caused grizzly bear mortality. (Willcox, 2016) The states of Montana, Idaho, and especially Wyoming exert huge pressures on the FWS to delist Yellowstone's grizzlies. Once delisted, the states will immediately sell trophy grizzly hunting permits for substantial amounts of money. (Peacock, 2014) Exactly how many hunting permits will be offered and how successful those hunts will be is unknown, but it is clear that an atmosphere will be created throughout the greater Yellowstone ecosystem where it is very easy to kill a grizzly for any reason. Grizzlies have one of the lowest reproductive rates of any land mammal; once the number of bear deaths outstrip the number of cubs born, the Yellowstone grizzly is on the road to extinction. (Peacock, 2015) The ESA represents the conscience of the broader public when it comes to grizzly bears and other imperiled species. By contrast, our state wildlife management agencies in the Northern Rockies represent the views of a politically influential minority whose interests focus on extractive uses of the natural world. State wildlife managers do not want to adopt binding restrictions because anything of this sort would put them at odds with their hunter constituency and their politically powerful masters in the energy and agriculture industries. (Willcox, 2016) I agree with Ms. Willcox. Your agency represents the American citizens - not just the fish and game departments of three states. American citizens do NOT want these bears delisted and they really do not want them hunted. Please listen to the science. Please listen to the citizens. Keep grizzly bears protected.	FWS-R6-ES-2016-0042-5161	
Preservation is to preserve and protect the iconic apex predator, the grizzly as they play a very formable role in the Greater Yellowstone Region.	302				Delisting	In regards to the delisting of the Grizzly in the GYR, USFWS needs to focus on PRESERVATION of the Grizzly species as opposed to conservation of them. Preservation is to preserve and protect the iconic apex predator, the grizzly as they play a very formable role in the Greater Yellowstone Region. Only looking at the grizzly using conservation and not inclusion of preservation, puts the grizzly at risk. Conservation views them as natural resources. They are not natural resources. They are a living breathing species that needs to be viewed different then a rock, vegetation or geological perception. They are not gases, liquids, plants or land formation. There needs to be a paradigm shift in the view of wildlife as a natural resource. They are not a resource to be used by our species for the pleasure of hunting. Humans need to learn to coexist with Grizzlies and all predators and use non-lethal management tools. Hunting a predator is not management.	FWS-R6-ES-2016-0042-5267	

It is imperative to maintain the preservation o bears, their functions in the ecosystem which benefit humanity in many ways, including the prevention of lethal diseases...and bears do it for free!	301				Delisting	It is far too premature to consider delisting the Grizzly Bear. They have rebounded only 600 more in number in a 40 year period. Man has interfered with 3 of their 4 major food sources: Climate change brought about by man has caused the White Bark Pine to begin dying thus inviting the pine beetle to finish the job. Invasive Lake Trout were stocked in the lakes which prey on the indigenous Cutthroat Trout which does inhabit shallower waters enabling bears to catch and eat them. The Lake Trout are deep water inhabitants and eat the Cutthroat Trout as well. Bears cant catch the Lake Trout. Moth larvae has been contaminated by human pesticides. With their food sources depleted in one area, they have to range to locate new sources. Bears cannot be held responsible for our mistakes nor expected to abide by man made sanctions. You are basically implying that Bears starve to death or else you will hunt and kill them. Fixing mistakes with more mistakes is not a sane manner of resolving any issue. It is imperative to maintain the preservation o bears, their functions in the ecosystem which benefit humanity in many ways, including the prevention of lethal diseases...and bears do it for free! Please keep the bears and all predators protected. They have a priceless value alive. Thank you.	FWS-R6-ES-2016-0042-5263	Value Based reason: they help with disease control as well as population control of other species.
600 bears have been born and survived in 40 years, thats 15 bears a year. Why is that even being considered a management problem?	303				Delisting	600 bears have been born and survived in 40 years, thats 15 bears a year. Why is that even being considered a management problem? The human population of the United States has nearly tripled in my lifetime...now thats a management problem! No to delisting!	FWS-R6-ES-2016-0042-0515	

600 bears have been born and survived in 40 years, thats 15 bears a year. Why is that even being considered a management problem? The human population of the United States has nearly tripled in my lifetime...now thats a management problem!	303				Delisting	600 bears have been born and survived in 40 years, thats 15 bears a year. Why is that even being considered a management problem? The human population of the United States has nearly tripled in my lifetime...now thats a management problem! No to delisting!	FWS-R6-ES-2016-0042-0515	
The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Indeed, at the recent announcement of the delisting proposal, Senator Larry Craig used the opportunity to call for weakening the Endangered Species Act. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources.	303	301			Delisting	The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population. Research has also shown threshold population effects, which could mean that by the time the problem is detected, it is too late to fix the problem. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Indeed, at the recent announcement of the delisting proposal, Senator Larry Craig used the opportunity to call for weakening the Endangered Species Act. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources. The delisting plan lacks binding motorized access management standards to protect habitat. The 1993 Grizzly Bear Recovery Plan and scientific research have demonstrated that roads kill bears.	FWS-R6-ES-2016-0042-5224	

Specifically, the Endangered Species Act requires that, before delisting can occur, among other things, there are adequate regulatory mechanisms in place to ensure that the grizzly bear does not slip back towards extinction. These regulatory mechanisms are the responsibility of the states of Wyoming, Montana and Idaho and the appropriate federal land management agencies. However, the necessary management plans that provide these commitments have not been finalized and provided to us by the FWS for review with the proposal.	301	303		Delisting	Thank you for the opportunity to comment on potential Yellowstone Grizzly de-listing. Prairie Hills Audubon Society wants to be assured that the states and federal land management agencies, including the U.S. Forest Service, will manage bears and their habitat in a way that ensures a healthy and expanding grizzly bear population into the future. Prairie Hills Audubon Society is seriously concerned that the U.S. Fish and Wildlife Service (FWS) does not have all the required information and assurances finalized to make an informed decision. Specifically, the Endangered Species Act requires that, before delisting can occur, among other things, there are adequate regulatory mechanisms in place to ensure that the grizzly bear does not slip back towards extinction. These regulatory mechanisms are the responsibility of the states of Wyoming, Montana and Idaho and the appropriate federal land management agencies. However, the necessary management plans that provide these commitments have not been finalized and provided to us by the FWS for review with the proposal. Wyoming has yet to finalize a revised grizzly bear state management plan, and the recently completed draft is not consistent with statements made in the delisting proposal. It is unclear if, let alone when, Idaho or Montana will update their management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the adequate regulatory mechanisms that are required. With development increasing in the Northern Rockies region, public lands are critical for providing essential secure habitat for grizzly bears into the future. The agencies in charge of our public lands have an obligation to ensure that an iconic species like the grizzly bear can continue to thrive. However, the U.S. Forest Service has not revealed when it will amend the management plans of the six national forests surrounding Yellowstone to provide for adequate habitat protections for grizzly bears post-delisting or when this process would be available for public review. Prairie Hills Audubon Society encourages the FWS to continue to work with the state grizzly bear management agencies, tribal agencies and state and federal land management agencies that will be responsible for grizzly bears post delisting on: - Ensuring that robust protections remain in place for the Yellowstone grizzly bear core population including strict limits on mortality and strong habitat protections within the Primary Conservation Area (PCA), the area identified to remain the most protective for grizzly bears after delisting; - Giving Yellowstone grizzly bears the opportunity to continue to expand their range and reconnect with other grizzly bear populations to the north as well as allow for Yellowstone grizzly bears to expand into the Bitterroot Recovery Zone.	FWS-R6-ES-2016-0042-5311	
Wyoming has yet to finalize a revised grizzly bear state management plan, and the recently completed draft is not consistent with statements made in the delisting proposal. It is unclear if, let alone when, Idaho or Montana will update their management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the adequate regulatory mechanisms that are required.	900			Delisting	Thank you for the opportunity to comment on potential Yellowstone Grizzly de-listing. Prairie Hills Audubon Society wants to be assured that the states and federal land management agencies, including the U.S. Forest Service, will manage bears and their habitat in a way that ensures a healthy and expanding grizzly bear population into the future. Prairie Hills Audubon Society is seriously concerned that the U.S. Fish and Wildlife Service (FWS) does not have all the required information and assurances finalized to make an informed decision. Specifically, the Endangered Species Act requires that, before delisting can occur, among other things, there are adequate regulatory mechanisms in place to ensure that the grizzly bear does not slip back towards extinction. These regulatory mechanisms are the responsibility of the states of Wyoming, Montana and Idaho and the appropriate federal land management agencies. However, the necessary management plans that provide these commitments have not been finalized and provided to us by the FWS for review with the proposal. Wyoming has yet to finalize a revised grizzly bear state management plan, and the recently completed draft is not consistent with statements made in the delisting proposal. It is unclear if, let alone when, Idaho or Montana will update their management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the adequate regulatory mechanisms that are required. With development increasing in the Northern Rockies region, public lands are critical for providing essential secure habitat for grizzly bears into the future. The agencies in charge of our public lands have an obligation to ensure that an iconic species like the grizzly bear can continue to thrive. However, the U.S. Forest Service has not revealed when it will amend the management plans of the six national forests surrounding Yellowstone to provide for adequate habitat protections for grizzly bears post-delisting or when this process would be available for public review. Prairie Hills Audubon Society encourages the FWS to continue to work with the state grizzly bear management agencies, tribal agencies and state and federal land management agencies that will be responsible for grizzly bears post delisting on: - Ensuring that robust protections remain in place for the Yellowstone grizzly bear core population including strict limits on mortality and strong habitat protections within the Primary Conservation Area (PCA), the area identified to remain the most protective for grizzly bears after delisting; - Giving Yellowstone grizzly bears the opportunity to continue to expand their range and reconnect with other grizzly bear populations to the north as well as allow for Yellowstone grizzly bears to expand into the Bitterroot Recovery Zone.	FWS-R6-ES-2016-0042-5311	

- Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support					Delisting	#NAME?	FWS-R6-ES-2016-0042-5249	
The FWS is being pressured by ranchers and hunters who want to be able to kill these bears and eventually wipe out the entire population.	303				Delisting	I am against removing the Grizzly Bear in the Greater Yellowstone Ecosystem population from the Federal List of Endangered and Threatened Wildlife. I do not see anywhere that the FWS has proven that this bear is completely recovered from being endangered and in particular, the food supply upon which the grizzly bear must depend is slowly being devastated by the continued drought conditions in this ecosystem. The FWS is being pressured by ranchers and hunters who want to be able to kill these bears and eventually wipe out the entire population. This is a disgusting attack on an animal that has struggled to survive in the best of conditions. Please listen to the people who are not hunters, cattle ranchers, hunting guides who are just waiting to be able to kill a grizzly. Just like the cry to de-list the wolves, the constant din of these people to destroy endangered and threatened animals that have finally recovered in the lands they historically occupy. I have been to the meetings in which I can see the FWS, Game and Fish, and other entities give in to the pressure of these groups. Isn't the job of the "Fish and Wildlife" Service to preserve and protect our fish and our wildlife? If you remove the grizzly bear from protection, you have failed these animals and the people who want to see them protected. The money that has been spent on bringing these animals back from the brink of extinction will have been for nothing if you so casually remove them from protection. PLEASE RECONSIDER THIS TERRIBLE DECISION!	FWS-R6-ES-2016-0042-0535	

As I said at the beginning, these are iconic beings and if truth be known, we have probably more in common with bears than we would think. We can learn from this species. But the appreciation of this species will be greatly compromised if we delist this bear. We will be forcing them to a perhaps meager existence which is not the purpose of the ESA.	301	302			Delisting	See attached file(s). In the attached file, I have comments on the following docket number: Number FWS-R6-ES-2016-0042. Attachments Comments on Delisting Grizzly Bears.20160331	FWS-R6-ES-2016-0042-0540	
The delisting of the GYE grizzly bears is premature. The grizzly bear was listed in 1975, and saw large population growth and stabilization. It has been listed for forty-one years, and while there has been significant growth in the program, when considering the possible implications of climate change and hunting on the species, forty-one years is not long enough time of protection. In allowing the states to manage the GYE grizzly bear that will allow the GYE, a game species, to potentially be hunted. The proposed rule states that Idaho, Wyoming, and Montana have no current plans to allow the grizzly to be hunted, but that proposition will not last long. State fish and wildlife agencies are more pliable than the federal government, increased public pressure to hunt the bears will lead to state regulated hunting.	301				Delisting	The delisting of the GYE grizzly bears is premature. The grizzly bear was listed in 1975, and saw large population growth and stabilization. It has been listed for forty-one years, and while there has been significant growth in the program, when considering the possible implications of climate change and hunting on the species, forty-one years is not long enough time of protection. In allowing the states to manage the GYE grizzly bear that will allow the GYE, a game species, to potentially be hunted. The proposed rule states that Idaho, Wyoming, and Montana have no current plans to allow the grizzly to be hunted, but that proposition will not last long. State fish and wildlife agencies are more pliable than the federal government, increased public pressure to hunt the bears will lead to state regulated hunting.	FWS-R6-ES-2016-0042-0591	

Even though it may appear that the grizzly has met the standard for the delisting rule, which opens the door for legal hunting, that is not the appropriate means of population control. The long term effects of the proposed delist control measures are tenuous at best.	301				Delisting	Please do not remove(delist) the grizzly bear from the protections stated in the Endangered Species Act. Even though it may appear that the grizzly has met the standard for the delisting rule, which opens the door for legal hunting, that is not the appropriate means of population control. The long term effects of the proposed delist control measures are tenuous at best. Climate changes, temperature increases, loss of white bark pine and other critical habitat components are totally unpredictable and are happening exponentially faster than predicted or considered. The apex predators are unable to adapt to those changes and will all be lost within a very short period of time. In the mean time we need to do everything humanly possible to provide them a bridge that helps them make the necessary adjustments, if that will even be possible. Humans need to stay out of areas that the grizzly needs for survival. If a bear-human conflict should occur I want to see nonlethal means used, prior to lethal removal. Travelers from all over the world visit the Yellowstone region in hopes of seeing and photographing the apex predators. That brings a lot of revenue into the local economies surrounding the Yellowstone region. It brings a lot of good will with it as well. Grizzly bears are not just a treasure of the state of Montana and the United States, they are a treasure of this planet and all of the people and children of future generations, and we need to start thinking in the bigger sense using an expanded perspective that we are the stewards of this planet and all the species who inhabit it. Please do the right thing and do not delist the grizzly, and, do not allow hunting of it for at least (5) five years post-delisting. Thank you for considering my comments and concerns.	FWS-R6-ES-2016-0042-0614	
Please follow the existing law and de-list the Yellowstone Grizzly Bear as all requirements to do so have been met.	304				Delisting	Please follow the existing law and de-list the Yellowstone Grizzly Bear as all requirements to do so have been met. Also the current management of this animal is causing excessive danger to both bear and human alike. It has recovered and the greater population needs new management to ensure safety of the public and success of the bear.	FWS-R6-ES-2016-0042-0701	

4) Disease can spread through a small population and reduce the population significantly and/or cause extinction - such as has occurred with Tasmanian Devil (Devil facial tumor disease).	301				Delisting	I am against the removal of the Greater Yellowstone Grizzly Bear Population from the Federal List of Endangered and Threatened Species for the following reasons: 1) Climate Change is impacting the ecosystem - reducing white-bark pine nuts available to grizzlies. 2) Climate Change is impacting and altering the ecosystem in ways that we do not foresee. 3) Human population growth and urban development infringes on habitat and connectivity between populations. 4) Disease can spread through a small population and reduce the population significantly and/or cause extinction - such as has occurred with Tasmanian Devil (Devil facial tumor disease). 5) There is no protected natural connectivity to the Selway Bitterroot area in Idaho. 6) There is no nearby grizzly population in the Selway Bitterroot area in Idaho. 6) Delisting will allow trophy hunting of the grizzly bear - which is a thoroughly disgusting and self centered pastime.	FWS-R6-ES-2016-0042-0727	
Idaho and Wyoming are insane as far as wildlife protection, especially predator protection, is concerned. I wouldn't trust them for a minute with the management of an animal as irrationally hated in those states as the grizzly.	303				Delisting	I strongly oppose the delisting of the Yellowstone ecosystem grizzly population, for the following reasons: 1. Only the smallest core habitat is in a protected area, the park. The increasing pressure on the remaining wild ecosystem by development on the periphery of the park and elsewhere in the region is not conducive to complacency about the ability of the population to continue to do well, even under the existing protections. 2. The habitat is still marginal for food sources, and the climate crisis is only going to make the situation worse. 3. Idaho and Wyoming are insane as far as wildlife protection, especially predator protection, is concerned. I wouldn't trust them for a minute with the management of an animal as irrationally hated in those states as the grizzly. Please withdraw this proposed regulation and continue to manage grizzly populations as they are managed today.	FWS-R6-ES-2016-0042-0743	

Removing the Grizzly Bear from the endangered species list is a mistake that will ensure the need to relist this magnificent predator. I believe that the decision is not based on sound scientific information, but rather on the pressure of political entities. Because it is not defensible to make such important decisions based on political pressure, science is manipulated and misinterpreted to develop convenient findings to support the political decision.	301	303		Delisting	Removing the Grizzly Bear from the endangered species list is a mistake that will ensure the need to relist this magnificent predator. I believe that the decision is not based on sound scientific information, but rather on the pressure of political entities. Because it is not defensible to make such important decisions based on political pressure, science is manipulated and misinterpreted to develop convenient findings to support the political decision. Predators play an overwhelmingly important role in the health of our ecosystems. However, throughout the history of the United States, our government and the general public have fostered a deep seated fear and demonization of predators, especially the large predators. This is evidenced by the near eradication of the Grizzly Bear and wolves and the widespread hatred of an essential species. Fear of predators has been institutionalized and the elimination of predators sold as a necessary program to protect protect livestock, and the western way of life. However, it doesn't take much effort to see the damage that such programs have on our ecosystems and the other problems that arise when predators are reduced to unsustainable population levels. Wildlife management decisions are too often based on the need to generate revenue and a perceived notion that large predators diminish our enjoyment of hunting big game species such as mule deer, elk. Certainly predators kill these species, but if we would allow the natural cycles of predators and game species to occur, we would find that our hunting would improve over time. We have created a hunger for revenue generated by the marketing of permits to kill large predators such as Grizzlies. What could stoke the prestige and ego more than shooting an evil killing machine as notorious as the Grizzly. Unfortunately, wildlife management decisions regarding the hunting of predators are often made with incomplete knowledge about the numbers of animals, the limiting effects of diminished habitat and the isolation of specie populations. Certainly climate change is having a negative impact on our wildlife but the political nature of this type of environmental deterioration is not taken into account. It is no secret that changing winter conditions in the northern Rockies is having a devastating impact on our forests. I have seen a significant change in the overall health of forests in the Sawtooth Mountains in Idaho. Most people might be surprised that a vital source of nourishment for the carnivorous beast, the Grizzly Bear, are pine nuts. Climate change has led to the rapid decline of the white bark pine and its production of nuts which are essential to the Grizzly. Wildlife managers have not given this fact enough weight in their decision making. After all, Grizzlies are carnivores, living by eating our precious game animals. Well, it is not so easy to replace an essential food source.	FWS-R6-ES-2016-0042-0750	
Wildlife management decisions are too often based on the need to generate revenue and a perceived notion that large predators diminish our enjoyment of hunting big game species such as mule deer, elk.	303			Delisting	Removing the Grizzly Bear from the endangered species list is a mistake that will ensure the need to relist this magnificent predator. I believe that the decision is not based on sound scientific information, but rather on the pressure of political entities. Because it is not defensible to make such important decisions based on political pressure, science is manipulated and misinterpreted to develop convenient findings to support the political decision. Predators play an overwhelmingly important role in the health of our ecosystems. However, throughout the history of the United States, our government and the general public have fostered a deep seated fear and demonization of predators, especially the large predators. This is evidenced by the near eradication of the Grizzly Bear and wolves and the widespread hatred of an essential species. Fear of predators has been institutionalized and the elimination of predators sold as a necessary program to protect protect livestock, and the western way of life. However, it doesn't take much effort to see the damage that such programs have on our ecosystems and the other problems that arise when predators are reduced to unsustainable population levels. Wildlife management decisions are too often based on the need to generate revenue and a perceived notion that large predators diminish our enjoyment of hunting big game species such as mule deer, elk. Certainly predators kill these species, but if we would allow the natural cycles of predators and game species to occur, we would find that our hunting would improve over time. We have created a hunger for revenue generated by the marketing of permits to kill large predators such as Grizzlies. What could stoke the prestige and ego more than shooting an evil killing machine as notorious as the Grizzly. Unfortunately, wildlife management decisions regarding the hunting of predators are often made with incomplete knowledge about the numbers of animals, the limiting effects of diminished habitat and the isolation of specie populations. Certainly climate change is having a negative impact on our wildlife but the political nature of this type of environmental deterioration is not taken into account. It is no secret that changing winter conditions in the northern Rockies is having a devastating impact on our forests. I have seen a significant change in the overall health of forests in the Sawtooth Mountains in Idaho. Most people might be surprised that a vital source of nourishment for the carnivorous beast, the Grizzly Bear, are pine nuts. Climate change has led to the rapid decline of the white bark pine and its production of nuts which are essential to the Grizzly. Wildlife managers have not given this fact enough weight in their decision making. After all, Grizzlies are carnivores, living by eating our precious game animals. Well, it is not so easy to replace an essential food source.	FWS-R6-ES-2016-0042-0750	

We know that if de-listed, Wyoming, Montana, and likely Idaho will enable trophy hunting of the grizzly. People taking out the dominate males from a stressed population will be bad for the species.	301				Delisting	I am against removing protection from grizzlies in the Yellowstone ecosystem by de-listing. We do not know how the current population of grizzlies will respond to their recent increase in human caused mortality, reduction in white bark pine nuts, reduction in Yellowstone Cutthroat, and reduction in the elk population. We know that if de-listed, Wyoming, Montana, and likely Idaho will enable trophy hunting of the grizzly. People taking out the dominate males from a stressed population will be bad for the species. The bears need at least five more years of protection to determine how the population will fare before we start hunting them. I am a Westerner, living in Idaho for over 36 years.	FWS-R6-ES-2016-0042-1083	
The grizzly bear is a major driver of the Northern Rocky Mountain economy.					Delisting	See Attached Attachments Cardori Zachary	FWS-R6-ES-2016-0042-1139	Value based reason

Removing the Grizzly Bear from the Federal Endangered Species classification is not only the proper thing to do but also what the Endangered Species Act was designed to do.	304				Delisting	Over the last hundred years wildlife has been supported and managed by scientific information. Numbers have been set and requirements made to insure the survival of every endangered species. Removing the Grizzly Bear from the Federal Endangered Species classification is not only the proper thing to do but also what the Endangered Species Act was designed to do. I know we will always have those "groups" that sit in the cities, watch TV, and contribute nothing to preserving any wildlife; that will protest any action no matter what scientific evidence says. States have managed such a wide section of wildlife for many years and they have done a wonderful job. Make it possible for this to continue.	FWS-R6-ES-2016-0042-1155	
The ESA was not intended to leave species on the list indefinitely. It was intended to identify, protect, and recover species so they are no longer considered imperiled. In this case the Act has reached its goal of identification of a species under threat locally (not globally, by the way), and to work toward its recovery in numbers of individuals until it has reached a viable population. This has been accomplished, and accomplished despite the decline of whitebark pine or trout in certain streams. These bears are generalists and can and will seek out alternate food sources - as they have demonstrated in areas where neither of the above-referenced food species even exist. The decline of a single particular species cannot control the success or failure of a diet generalist. It is incumbent upon the UFSWS to obey the law, acknowledge the population recovery data, and to de-list the species in the lower-48 states.	304				Delisting	Thanks for putting this out for public comment. It is long since time to de-list the grizzly bear (<i>Ursus arctos horribilis</i>) in the lower-48 states/Yellowstone ecosystem. As one who lives, works, hunts, fishes, photographs, and recreates in grizzly bear habitat, I believe that despite biologist's best efforts the estimates of population numbers are quite a bit lower than actual true numbers of individual. A few biologists just can't adequately cover such vast acreage to accurately count a very mobile and nearly invisible population of largely nocturnal animals. However, the semi-ephemeral sign they leave behind, particularly in mud and snow, provides good records of sizes and ages, as well as numbers of individuals in local populations. The biologist's numbers, even though they are likely under counting the real population, indicate recovery. And these numbers do so without the help of this "anecdotal" information from trained wildlife professionals such as myself. The ESA was not intended to leave species on the list indefinitely. It was intended to identify, protect, and recover species so they are no longer considered imperiled. In this case the Act has reached its goal of identification of a species under threat locally (not globally, by the way), and to work toward its recovery in numbers of individuals until it has reached a viable population. This has been accomplished, and accomplished despite the decline of whitebark pine or trout in certain streams. These bears are generalists and can and will seek out alternate food sources - as they have demonstrated in areas where neither of the above-referenced food species even exist. The decline of a single particular species cannot control the success or failure of a diet generalist. It is incumbent upon the UFSWS to obey the law, acknowledge the population recovery data, and to de-list the species in the lower-48 states. It is time to let the bears be bears, allow them to be just another species of wildlife making a living in appropriate habitat, and to celebrate the fact that they are still out there making the wilderness wild.	FWS-R6-ES-2016-0042-1205	

I do not trust state fish and game agencies to manage these animals responsibly. They only serve hunters, trappers and outfitters, and do not care about conservation biology. We can see what a mess they have made of wolf management in all the states that have delisted wolves.	303				Delisting	Please do not delist Grizzly bears. It's unfortunate that in our society, there seem to be only two categories of management: "listed under the ESA" or "open season." I do not trust state fish and game agencies to manage these animals responsibly. They only serve hunters, trappers and outfitters, and do not care about conservation biology. We can see what a mess they have made of wolf management in all the states that have delisted wolves. I'm not saying that management is not required, but I am saying that state game agencies are political entities that have demonstrated no interest in these species, other than as targets for hunters. They even hold wildlife "derbies," which is illustrative of their mindset. We need a different kind of management - ecosystem management - and the FWS is the entity best able to carry this out. The ESA requires the government to recover not only species, but the "ecosystems upon which they depend," and until we have re-established those functioning ecosystems, individual species should remain listed, perhaps in a "threatened" status. Call it an upgrade in condition, but please do not open the door to hunting, especially trophy hunting, which is a cruel and despicable waste of life. Bears that come too close to private property and human habitations should be darted and relocated, and killed only on the rare occasions that they come back and cause damage. I would submit that the Greater Yellowstone Ecosystem needs more habitat protection, so that large animals (elk, wolves, bears, bison, etc.) can move freely without being killed by humans. The real answer is not to keep bears to a minimum "viable" population and call that "recovery," but to provide more habitat. I recognize the difficulty in that, but I urge you to work toward establishment of the great Yellowstone-to-Yukon corridor, which is the only lasting hope of survival for these great charismatic species. No good can come of hunting grizzly bears.	FWS-R6-ES-2016-0042-5335	
I'm not saying that management is not required, but I am saying that state game agencies are political entities that have demonstrated no interest in these species, other than as targets for hunters. They even hold wildlife "derbies," which is illustrative of their mindset. We need a different kind of management - ecosystem management - and the FWS is the entity best able to carry this out.	303				Delisting	Please do not delist Grizzly bears. It's unfortunate that in our society, there seem to be only two categories of management: "listed under the ESA" or "open season." I do not trust state fish and game agencies to manage these animals responsibly. They only serve hunters, trappers and outfitters, and do not care about conservation biology. We can see what a mess they have made of wolf management in all the states that have delisted wolves. I'm not saying that management is not required, but I am saying that state game agencies are political entities that have demonstrated no interest in these species, other than as targets for hunters. They even hold wildlife "derbies," which is illustrative of their mindset. We need a different kind of management - ecosystem management - and the FWS is the entity best able to carry this out. The ESA requires the government to recover not only species, but the "ecosystems upon which they depend," and until we have re-established those functioning ecosystems, individual species should remain listed, perhaps in a "threatened" status. Call it an upgrade in condition, but please do not open the door to hunting, especially trophy hunting, which is a cruel and despicable waste of life. Bears that come too close to private property and human habitations should be darted and relocated, and killed only on the rare occasions that they come back and cause damage. I would submit that the Greater Yellowstone Ecosystem needs more habitat protection, so that large animals (elk, wolves, bears, bison, etc.) can move freely without being killed by humans. The real answer is not to keep bears to a minimum "viable" population and call that "recovery," but to provide more habitat. I recognize the difficulty in that, but I urge you to work toward establishment of the great Yellowstone-to-Yukon corridor, which is the only lasting hope of survival for these great charismatic species. No good can come of hunting grizzly bears.	FWS-R6-ES-2016-0042-5335	

f protections are lifted, they will inevitably be pushed to the brink of extinction. They have already been exterminated from 95% of their historic range, and instead of de-listing, more studies should be done to allow them to occupy their historic range. Due to human pressures, Grizzly bears are already confined to the "recovery ecosystems" if protections are removed, Yellowstone bears could be confined to extinction within our lifetimes.	301				Delisting	Please keep protections for all 650 Grizzly Bears that remain in the Yellowstone area. If protections are lifted, they will surely be exterminated by people who will flock from all over the world for trophy hunting. Grizzlies have low reproductive rates, and are already feeling pressures from habitat fragmentation, human pressures, and a decline in their food sources such as wild ungulates, fish and other prey species. If protections are lifted, they will inevitably be pushed to the brink of extinction. They have already been exterminated from 95% of their historic range, and instead of de-listing, more studies should be done to allow them to occupy their historic range. Due to human pressures, Grizzlies are already confined to the "recovery ecosystems" if protections are removed, Yellowstone bears could be confined to extinction within our lifetimes. A Grizzly gallbladder can sell for up to \$10,000 on the black market, and the larger the gallbladder, the higher the price and in Korea, as much as \$15,000. The demand for people to kill them is extremely high and with only a few isolated populations these bears need to be protected and allowed to roam free without fear of being killed. In the Salmon River Watershed in California, one large family decimated a bear population by killing more than 200 bears (likely for the gall bladders) in one season. "It's hard for any enforcement agency to get a handle on wildlife crime. Unlike crimes against people [who report them], you usually have to catch a poacher or trafficker in the act," said Sandy Cleva, spokesperson for the U.S. Fish and Wildlife Service's Office of Law Enforcement. Please extend the comment period so that we can adequately study and offer better solutions for increasing biodiversity during this time of one of the largest extinctions on the face of the planet.	FWS-R6-ES-2016-0042-1247	
There is simply no reason to delist other than cattle operations which have been leasing government land for cents on the fair market value dollar do not want to give up their "cushy deal".	303				Delisting	The grizzly is the slowest reproducing mammal in North America. To our knowledge there is no population number that has ever been proclaimed "safe" by any reputable study. The businesses and residents in grizzly territory have learned to peacefully co-exist. Bear-on-human incidents are extremely rare within fifty miles of Yellowstone Park. There is simply no reason to delist other than cattle operations which have been leasing government land for cents on the fair market value dollar do not want to give up their "cushy deal". These are national lands. While we have many friends in Wyoming and Montana, there are times when local interests must yield to national interests. This is one of those times. The grizzlies should be allowed to "naturally expand." This especially includes expansion of their range into the Big Horn Mountains. I have elected to submit these comments anonymously. I am apprehensive about retaliation. A Native American website has suggested that Mr. Servheen is integrally involved with a renowned trophy hunting organization.	FWS-R6-ES-2016-0042-1432	

Representing the over 2000 members of the Tacoma Sportsmen's Club in Puyallup, WA, their strong recommendation is that the grizzly bear population in the GYE must be removed from the Federal List of Endangered and Threatened Wildlife. The grizzly has more than tripled the goal established for the GYE.	304				Delisting	Representing the over 2000 members of the Tacoma Sportsmen's Club in Puyallup, WA, their strong recommendation is that the grizzly bear population in the GYE must be removed from the Federal List of Endangered and Threatened Wildlife. The grizzly has more than tripled the goal established for the GYE. More importantly, wildlife should not be managed by radical voices of environmentalists but by biologists in state wildlife departments. Delist the Grizzly.	FWS-R6-ES-2016-0042-1564	
MOST AMERICANS OPPOSE DELISTING. Fifty-five percent of Americans are opposed to ending federal protections for the region's grizzly bears, and by a 3-to-1 margin people oppose grizzly hunting, a new poll conducted by Remington Research Group commissioned by the Humane Society of the United States and Wyoming Wildlife Advocates.					Delisting	My position on the proposed rule concerning the Removal of Grizzly Bears from the Greater Yellowstone Ecosystem from the Endangered and Threatened Wildlife list is as follows: - The proposed rule does nothing to address the lack of an adequate grizzly gene pool in the Yellowstone area. The existing grizzly population is too small and lacks access to other populations north of this ecosystem. There currently are no plans between Montana, Idaho or Wyoming to provide the means for grizzlies to reach other bear populations which would give them the opportunity to improve the biological diversity. - DECLINING FOOD SOURCES: It has been documented by Wildlife Management teams that grizzlies' main food sources have been wiped out due to climate change (whitebark pine), invasive species (cutthroat trout) and use of pesticides in/and near the Yellowstone Ecosystem (moths). While some waterways are being restocked with cutthroat trout, this is only a part of the necessary diet for grizzly bears. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. Montana, Wyoming and Idaho have shown themselves to be incredibly hostile toward predators. Bears trying to disperse have become victims of trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. Such is likely to be the norm after delisting. Any bear that has its den outside the Grand Teton Park, Yellowstone Park, or on national forest lands, there is a good chance that these bears will be killed by hunters. This happened in November 2015 in Montana at the northern edge of the Yellowstone Ecosystem when a hunter, claiming self defense without proof of any aggression shown by the bear, shot and killed with one bullet, Grizzly #211, also known as Scarface, an aged grizzly (26 plus years) who happened to be in poor health. To add insult to the poaching of #211, the State of Montana withheld media release of this incident until after the comment period for the Delisting Grizzlies proposal was passed. This is exactly the kind of thing that removing Grizzlies from the Endangered List will become the norm for Montana, Wyoming and Idaho, under the guise of protecting the bears. The only protections these states want is to line their state coffers by the trophy hunters. - MOST AMERICANS OPPOSE DELISTING. Fifty-five percent of Americans are opposed to ending federal protections for the region's grizzly bears, and by a 3-to-1 margin people oppose grizzly hunting, a new poll conducted by Remington Research Group commissioned by the Humane Society of the United States and	FWS-R6-ES-2016-0042-1550	

55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium.				Delisting	FWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. But no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. But this is not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. But under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. FWS claims that the agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. But when David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth to only one or two cubs a year. FWS claims that Montana Please, do not delist grizzly bears. They have taken 40 years to increase their number by 600, or a mere 15 bears a year. The problems lies w/ in man's mismanagement of their food sources, White Bark Pine from climate change, the moronic illegal stocking of lake trout which feed on the brook trout which are a source of food for bears as they are shallow water fish compared to the deep water fish Lake trout are, and the use of pesticides which decimate the moth larva. In addition to this, mismanagement has relegated areas of habitat to remote islands making genetic diversity a problem. This is intentional as you advocate for more space for cattle knowing they cant stay in one locale year around...obviously, neither can wildlife. Your job description clearly states you are responsible for the welfare of the land, air, water, plant life including trees, and all animals that inhabit said land. It also states lethal use is the very last option. Because of your failure to manage in a sensible fashion, you wish to dispose of a species to cover up your error and your need for greed. Caving in to the political and special interest groups whims is further proof you are not managing wildlife in the interests of animal's welfare. I propose opening up corridors and buffer zones for all wildlife and delisting possible development areas for humans. There are some things money cant buy and our future generations have to have their safety of being able to sustain life insured. Read the Public Trust Doctrine sometime...its only been in the constitution for over 200 years! Bears, wolves, cougars, and other predators are essential to our very lives in numerous ways. Just for example, of the 5 major lethal diseases devastating 30% of the cervid herds in North America today, 4 of them are transmittable to humans and are just as lethal to humans as they are to cervids. Delisting bears or any other predator is a direct threat to the safety and lives of humans. Delisting means you support the spread of rabies, Hanta Virus, Rocky Mountain Spotted Fever, Chronic Wasting Disease, Epizootic Hemorrhaging Disease, Blue tongue Virus, Bubonic Plague (500 cases every year reported in Co and NM) Lymes Disease, Dry Rot Hoof Disease, and a host of other diseases to reign amok in human populations. Medical costs cost everyone, so you are also promoting economical terrorism. Regardless what you personally believe, something bigger than us put this whole design together. The complexity of it is fascinating and overwhelming how all living thing interact together in a connective fashion is something man cannot duplicate in his wildest imagination. Because you dont understand something is not a reason to hate it or want to kill it. Nature has an excellent record of managing itself. Our record suck! Mt. Id. and Mt. have 325K square miles of area and you call 5,000 square miles of habitat (62.5 of	FWS-R6-ES-2016-0042-1611
This is intentional as you advocate for more space for cattle knowing they cant stay in one locale year around...obviously, neither can wildlife. Your job description clearly states you are responsible for the welfare of the land, air, water, plant life including trees, and all animals that inhabit said land. It also states lethal use is the very last option. Because of your failure to manage in a sensible fashion, you wish to dispose of a species to cover up your error and your need for greed. Caving in to the political and special interest groups whims is further proof you are not managing wildlife in the interests of animal's welfare.	303			Delisting	15 bears a year. The problems lies w/ in man's mismanagement of their food sources, White Bark Pine from climate change, the moronic illegal stocking of lake trout which feed on the brook trout which are a source of food for bears as they are shallow water fish compared to the deep water fish Lake trout are, and the use of pesticides which decimate the moth larva. In addition to this, mismanagement has relegated areas of habitat to remote islands making genetic diversity a problem. This is intentional as you advocate for more space for cattle knowing they cant stay in one locale year around...obviously, neither can wildlife. Your job description clearly states you are responsible for the welfare of the land, air, water, plant life including trees, and all animals that inhabit said land. It also states lethal use is the very last option. Because of your failure to manage in a sensible fashion, you wish to dispose of a species to cover up your error and your need for greed. Caving in to the political and special interest groups whims is further proof you are not managing wildlife in the interests of animal's welfare. I propose opening up corridors and buffer zones for all wildlife and delisting possible development areas for humans. There are some things money cant buy and our future generations have to have their safety of being able to sustain life insured. Read the Public Trust Doctrine sometime...its only been in the constitution for over 200 years! Bears, wolves, cougars, and other predators are essential to our very lives in numerous ways. Just for example, of the 5 major lethal diseases devastating 30% of the cervid herds in North America today, 4 of them are transmittable to humans and are just as lethal to humans as they are to cervids. Delisting bears or any other predator is a direct threat to the safety and lives of humans. Delisting means you support the spread of rabies, Hanta Virus, Rocky Mountain Spotted Fever, Chronic Wasting Disease, Epizootic Hemorrhaging Disease, Blue tongue Virus, Bubonic Plague (500 cases every year reported in Co and NM) Lymes Disease, Dry Rot Hoof Disease, and a host of other diseases to reign amok in human populations. Medical costs cost everyone, so you are also promoting economical terrorism. Regardless what you personally believe, something bigger than us put this whole design together. The complexity of it is fascinating and overwhelming how all living thing interact together in a connective fashion is something man cannot duplicate in his wildest imagination. Because you dont understand something is not a reason to hate it or want to kill it. Nature has an excellent record of managing itself. Our record suck! Mt. Id. and Mt. have 325K square miles of area and you call 5,000 square miles of habitat (62.5 of	FWS-R6-ES-2016-0042-1602

Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE.					Delisting	No one really knows how many grizzlies are in the GYE. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council stated: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally.	FWS-R6-ES-2016-0042-1666	
If these bears have reached their carrying capacity within the ecosystem and they no longer meet the criteria to be classified as endangered or threatened then why keep them on the list. Keeping them on the list in my mind is pointless if there is no need for them to be there.	304				Delisting	See attached file(s) Attachments Delist the Grizzly	FWS-R6-ES-2016-0042-1716	

--Why did it take 6 months to report Scarface's murder? It seems like it was done to fit the needs of the Feds' and states' delisting and trophy hunting narrative.-- the proposal is not based on the best available science	303				Delisting	I strongly OPPOSE the proposed removal of Grizzly bears from the Endangered list. --recent reports of the killing of Scarface (tagged as Bear 211) tells us about the future that faces Grizzlies once they are delisted. Even while supposedly protected under the ESA, Scarface and the other 61 grizzlies in 2015 were killed. Delisting them would cause a bloodbath. --Why did it take 6 months to report Scarface's murder? It seems like it was done to fit the needs of the Feds' and states' delisting and trophy hunting narrative. -- the proposal is not based on the best available science. It is premature to change the bears' protected status -- delisting Grizzlies will immediately open them to Trophy Hunting. This move is nothing but a giveaway to rich, white hunters. -- the move is opposed by local Indian tribes 'GOAL Tribal, an association of Native American tribes and groups' -- the FWS claim that 'grizzlies have reached their "carrying capacity" in Yellowstone and the ecosystem will not support any additional bears' is extremely dubious. The the bears' dispersal and increasing territory are likely because they are seeking additional food such as ungulates, something that puts them in direct conflict with local hunters and ranchers. This is due to the decline in the grizzlies' main food sources (such as whitebark pine nuts, which is under threat from invasive mountain pine beetles) --how will the bears' food will fare in the future -- how do we know that their population growth has truly stabilized. both avoid points indicate that proposal is extremely premature	FWS-R6-ES-2016-0042-1759	
Please stick with the scientifically sustainable plan and delisting criteria reached in 2004. The recovery goal was met and we can't manage the Wildlife with emotion and tears, it won't work.	304				Delisting	Please stick with the scientifically sustainable plan and delisting criteria reached in 2004. The recovery goal was met and we can't manage the Wildlife with emotion and tears, it won't work. Once again the 3 states involved have jumped through ALL the hoops and the frivolous lawsuits keep coming. Reset the goal post is the way of the environmentalist, who don't understand basic Wildlife conservation/management. We are loaded with Grizzlies and they weren't meant to stay on the endangered species list for an eternity. Same thing with wolves....both need delisted so they don't continue to overpopulate and destroy the rest of the Wildlife. As usual we reached the goals and it will never be enough for the emotionally charged that would rather see them die of disease or starvation before they approve of hunting any animal. Anti hunting rhetoric only hurts the species, whether they think so or not. Can't manage Wildlife with hugs. If they aren't delisted your agency will have to kill them off in greater numbers than regulated hunting will, due to problems with too many Bear for the region to hold. Stay with your agreements, for once, and delist.	FWS-R6-ES-2016-0042-1771	

Most Americans oppose delisting of the grizzly bear. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it.					Delisting	I'm writing to comment on the proposal to remove the Greater Yellowstone Grizzly Bear from the Federal List of Endangered and Threatened Wildlife. As we saw with Scarface, grizzly bears will be killed even if they remain protected. In 2015, a record number of Yellowstone bears were killed. It is premature to delist now. We should wait and see how these removals impact the overall population. If hunting is permitted, there should be a moratorium until states can absolutely prove they can manage the grizzly population to keep it at least at current levels. There must be buffer zones around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park. As you know, grizzlies are one of the slowest reproducing mammals. As a result, loss of several females in a year would be devastating for the population. Most Americans oppose delisting of the grizzly bear. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The proposed delisting does not address the genetic isolation of Yellowstone grizzlies. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Please keep these points in mind when making any decision on delisting of the grizzly in the Yellowstone ecosystem.	FWS-R6-ES-2016-0042-1820	
If bears are delisted, hunting should not be allowed.	305				Delisting	Please keep Yellowstone ecosystem grizzly bears protected under the Endangered Species Act. If bears are delisted, hunting should not be allowed. A large majority of Americans (68%), including 50% of hunters, oppose sport hunting of grizzly bears. These animals are icons of the West and are revered as sacred beings by the native tribes, 50 of which oppose delisting. In addition, record number of grizzly bears were killed in 2015 - including the famous patriarch of Yellowstone, Scarface. Most of these killings were due to conflict with hunters or livestock operations. Once delisted, the states will be able to remove even more bears from the ecosystem due to human conflicts. We need to see what that looks like before grizzly hunting is permitted. Therefore, if bears are delisted, USFWS should institute a minimum five year moratorium on hunting to enable the surrounding states to prove effective management of grizzly bears. Finally, if hunting is allowed, there must be no-hunt zones around the national parks and connecting Yellowstone and Grand Teton national parks. Hunting of roadside bears and popular park bears that wander out of the park endangers not only the bear population but the economy of the region. Yellowstone's nature-based economy is worth one billion dollars a year. People who work at the park can tell you what visitors are coming to see. It is not the mud pots or Old Faithful that are the big draw. Tourists flock to Yellowstone and the Grand Tetons for the wildlife - with grizzly bears topping the list. For these reasons, I ask USFWS to withdraw its plan to delist grizzly bears in the Yellowstone ecosystem or, at a minimum, dramatically strengthen the plan to protect a population that took 40 years to grow.	FWS-R6-ES-2016-0042-1822	

A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. You claim: Your agency will stay involved with protecting the grizzly population after delisting. A	301				Delisting I most adamantly oppose your agency's proposal to strip Endangered Species Act protection from the Greater Yellowstone Ecosystem grizzly bear rebutting each of your claims for wanting to do so. You claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." You claim: The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. You claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes	FWS-R6-ES-2016-0042-1835	
The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public.	303				Delisting Yellowstone National Park has the largest grizzly population in the lower 48. FWS estimates around 700. The proposal to delist Yellowstone grizzly bears is irresponsible and will result in the decimation of our Country's iconic symbol of the West. For the following reasons below the proposal to delist must be abandoned: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. 2. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout. 3. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. The population will decline after delisting, and cannot be sustained without life-support measures. 4. The delisting plan fails to address issues associated with high, ongoing human caused grizzly bear mortality. Most of the grizzly bears that die in the Greater Yellowstone Ecosystem die of human causes, and most are avoidable. While Yellowstone Park and some communities outside the park have gone to enormous measures to remove grizzly bear attractants, others have not. The problem of mortality of food-habituated bears will only get worse after delisting, when allowable mortality levels are raised, and resources for conflict resolution are reduced. Because problem grizzly bears are a human safety problem, it only makes sense to resolve the ongoing sanitation issues in the ecosystem before delisting. 5. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public. 6. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Successes in resolving conflicts typically occur because of the ESA	FWS-R6-ES-2016-0042-1912	

This should be looked at for it's possible social ramifications in society as well.	302				Delisting	We absolutely should keep the door shut on hunting of grizzlies near the Yellowstone region. If we open those doors hunting these bears will be like opening the flood gates of a damn. It will soon be big game and remove any protections for wildlife in the area. This should be looked at for it's possible social ramifications in society as well. We are living in a society where cell phone usage is the highest it has ever been. Children and adults are spending less time outside and more time watching television of browsing the interest. We need to be able to keep the wildlife here in America protected. It's an important aspect of teaching children and adults alike about our past history, ecosystem, preservation of natural habitats. In a modern day society the need does not exist for the hunting of big game animals like bears. It took 41 years for the population of Grizzlies to triple in size. How long do you think it will be before that population size has been tripled down in size due to releasing the hunting measures. The best conservation policy would be one that is beneficial for the citizens of this country, the grizzlies, visitors to the park, and residents of the occupying states. Removing the grizzlies from GYE and replacing them to DPS is one move, but allowing Grizzlies to be hunted again is a horrific idea for all of those that admire the freedom of wildlife. I encourage you to reconsider letting natural habitats of the land be subject to the mercy of guns, bows, traps, and a number of hunting devises that put the bears at a natural disadvantage.	FWS-R6-ES-2016-0042-2133	
Grizzlies in the lower forty-eight states have a special significance for millions of American citizens. Their continued existence (along with wolves and cougars) as the apex predators of the increasingly constricted natural wildlife areas is extraordinarily important to most of us. Given the fact that FWS has already screwed up the reintroduction of buffalo and wolves to the Yellowstone ecosystem, this proposed delisting should be postponed for at least another five years.	302				Delisting	Delisting Yellowstone Grizzlies in 2016 is an ill-advised and premature proposal. There has not been enough preparation to secure adequate habitat protection for them, and I am appalled that FWS continually caves in to pressure from ranching interests and adjacent State governments to facilitate hunting and culling of wildlife populations. Given the demonstrable and growing adverse effects of global warming on food sources bears rely upon, there is no justification for concluding that grizzly numbers have recovered sufficiently to remove this ecosystem's population from the protections of the ESA. Grizzlies in the lower forty-eight states have a special significance for millions of American citizens. Their continued existence (along with wolves and cougars) as the apex predators of the increasingly constricted natural wildlife areas is extraordinarily important to most of us. Given the fact that FWS has already screwed up the reintroduction of buffalo and wolves to the Yellowstone ecosystem, this proposed delisting should be postponed for at least another five years.	FWS-R6-ES-2016-0042-2400	

Delisting the grizzly bear would just be another reflection of corrupted ethics in Washington.	303				Delisting	See Attached Attachments Bayly Phillip	FWS-R6-ES-2016-0042-2457	
Despite all claims to the contrary, wolves have not been exterminated since their de-listing and neither will the Grizzly.	304				Delisting	I strongly support de-listing as long as we are confident in the numbers that we're working with (and it sounds like we are). In the same way that wolves were de-listed, the science and the law is unambiguous. The population has recovered. It no longer meets the criteria for listing as threatened or endangered and therefore - it no longer should be. Based on the numbers and the language of the law, there is no reason to argue about this anymore. Some organizations will see this differently based on factors that have nothing to do with the hard numbers or the law. But the truth is, those same organizations should see this for what it is - an unmitigated success for the Grizzly Bear itself - and for all of the combined efforts that so many have put into the process of making this happen. This should be celebrated. Despite all claims to the contrary, wolves have not been exterminated since their de-listing and neither will the Grizzly. Those of us who still have a conscience, hunters and non-hunters alike, could never allow that to happen. The Grizzly Bear and the wilderness that it represents, is far too valuable to the human soul.	FWS-R6-ES-2016-0042-2461	

Even though grizzly bears have made a comeback of sorts, removing them from protection would be putting them back at risk of being killed by human beings just for sport or some other weak excuse.	301				Delisting	Please DO NOT REMOVE grizzly bears from the list of endangered and threatened wildlife in the Greater Yellowstone Ecosystem. Even though grizzly bears have made a comeback of sorts, removing them from protection would be putting them back at risk of being killed by human beings just for sport or some other weak excuse. That is disgusting. No wild animals anywhere should be killed just for sport. Let's protect our wildlife in Yellowstone and elsewhere. If fact, extend the protection zone outside the Park to 100 miles outside the park to protect those who wander outside.	FWS-R6-ES-2016-0042-2490	
Look at the ages of the bears still at Yellowstone - how many will pass due to age or sickness in the next few years? How many females are there still in breeding age? How many cubs survive each year? It's is not just about the number they are at now. I don't think 770 is a large number. Nature takes care of itself.	301				Delisting	I really hope that you leave the Grizzly Bear on the Federal List of Endangered and Threatened Wildlife. It has taken them 41 years to grow such a small number. They are beautiful creatures. I hope to be able to see one in person one day. It is not hurting anything or anyone, except for big game hunters by leaving them and others on the list. Please take deep consideration before making any decision. Look at the ages of the bears still at Yellowstone - how many will pass due to age or sickness in the next few years? How many females are there still in breeding age? How many cubs survive each year? It's is not just about the number they are at now. I don't think 770 is a large number. Nature takes care of itself. We as humans need to allow nature to take it's own course and stay our of the way.	FWS-R6-ES-2016-0042-2515	

The Greater Yellowstone Ecosystem (GYE) population is much smaller than the Northern Range bears, but the Northern population is not being considered for de-listing. The GYE population is being threatened because industrial, energy, and development companies have been applying tremendous political pressure through lobbying and heavy-handed public relations campaigns (promising jobs, dismissing science; the usual stuff). A					Delisting De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, seasonable resilience, and availability throughout the habitat. The Greater Yellowstone Ecosystem (GYE) population is much smaller than the Northern Range bears, but the Northern population is not being considered for de-listing. The GYE population is being threatened because industrial, energy, and development companies have been applying tremendous political pressure through lobbying and heavy-handed public relations campaigns (promising jobs, dismissing science; the usual stuff). The GYE grizzlies are an "island population". This means that they are adapted to live and thrive within a specific geographic range. Substantial threats or changes to that habitat would likely pressure the bears to try and relocate, but they cannot successfully do so. The Greater Yellowstone Ecosystem is the environment to which they have adapted over eons. There is not another environment to which they could relocate and remain a viable species. Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability. US Fish and Wildlife data regarding the GYE grizzly population is suspect at best. For years, most counts of the population were in the 200 to 400 range. When de-listing was first proposed in 2007, the number suddenly shot up to 700. The methods used to arrive at that number involve a great deal of extrapolation from an extremely small sample of verified sightings. Rather than relying on US FWS data (pressured by lobbyists and hostile legislators), the public should demand research by independent organizations like The Ecological Society of America or the National Research Council. Current population estimates are untrustworthy, and the field needs good peer-reviewed analysis by objective scientists. If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it.	FWS-R6-ES-2016-0042-2542	
US Fish and Wildlife data regarding the GYE grizzly population is suspect at best. For years, most counts of the population were in the 200 to 400 range. When de-listing was first proposed in 2007, the number suddenly shot up to 700. The methods used to arrive at that number involve a great deal of extrapolation from an extremely small sample of verified sightings. Rather than relying on US FWS data (pressured by lobbyists and hostile legislators), the public should demand research by independent organizations like The Ecological Society of America or the National Research Council. Current population estimates are untrustworthy, and the field needs good peer-reviewed analysis by objective scientists . A	303				Delisting De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, seasonable resilience, and availability throughout the habitat. The Greater Yellowstone Ecosystem (GYE) population is much smaller than the Northern Range bears, but the Northern population is not being considered for de-listing. The GYE population is being threatened because industrial, energy, and development companies have been applying tremendous political pressure through lobbying and heavy-handed public relations campaigns (promising jobs, dismissing science; the usual stuff). The GYE grizzlies are an "island population". This means that they are adapted to live and thrive within a specific geographic range. Substantial threats or changes to that habitat would likely pressure the bears to try and relocate, but they cannot successfully do so. The Greater Yellowstone Ecosystem is the environment to which they have adapted over eons. There is not another environment to which they could relocate and remain a viable species. Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability. US Fish and Wildlife data regarding the GYE grizzly population is suspect at best. For years, most counts of the population were in the 200 to 400 range. When de-listing was first proposed in 2007, the number suddenly shot up to 700. The methods used to arrive at that number involve a great deal of extrapolation from an extremely small sample of verified sightings. Rather than relying on US FWS data (pressured by lobbyists and hostile legislators), the public should demand research by independent organizations like The Ecological Society of America or the National Research Council. Current population estimates are untrustworthy, and the field needs good peer-reviewed analysis by objective scientists. If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it.	FWS-R6-ES-2016-0042-2542	

As a hunter and wildlife photographer, retired conservation officer, and regional habitat manager for the South Dakota Department of Game Fish and Parks, I feel that available scientific data indicates that the Greater Yellowstone Ecosystem(GYE) population of grizzly bears (<i>Ursus arctos horribilis</i>) has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). The United States Fish and Wildlife Service (Service) has also proposed to identify the GYE grizzly bear population as a distinct population segment (DPS). Therefore, the Service proposes to revise the List of Endangered and Threatened Wildlife, under the authority of the Act, by removing the GYE population. The Service has determined that the GYE grizzly bear population has increased in size and more than tripled its occupied range since being listed as threatened under the Act in 1975 and that threats to the population are sufficiently minimized. Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000 - also likely to be proposed for delisting), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. Existing state management plans will protect Yellowstone grizzly bears and will allow them to connect to other grizzly populations if they are delisted now. Wyoming, Montana, and Idaho, the three states where Yellowstone grizzly bears live, plan to jointly manage Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600. NGO's should be celebrating the delisting and not challenging because of the support from hunters, state and federal wildlife agencies for the work that they have done to restore this population. I fully support delisting this GYE population of grizzly bears. Great job USFWS!	304				Delisting	As a hunter and wildlife photographer, retired conservation officer, and regional habitat manager for the South Dakota Department of Game Fish and Parks, I feel that available scientific data indicates that the Greater Yellowstone Ecosystem (GYE) population of grizzly bears (<i>Ursus arctos horribilis</i>) has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). The United States Fish and Wildlife Service (Service) has also proposed to identify the GYE grizzly bear population as a distinct population segment (DPS). Therefore, the Service proposes to revise the List of Endangered and Threatened Wildlife, under the authority of the Act, by removing the GYE population. The Service has determined that the GYE grizzly bear population has increased in size and more than tripled its occupied range since being listed as threatened under the Act in 1975 and that threats to the population are sufficiently minimized. Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000 - also likely to be proposed for delisting), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. Existing state management plans will protect Yellowstone grizzly bears and will allow them to connect to other grizzly populations if they are delisted now. Wyoming, Montana, and Idaho, the three states where Yellowstone grizzly bears live, plan to jointly manage Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600. NGO's should be celebrating the delisting and not challenging because of the support from hunters, state and federal wildlife agencies for the work that they have done to restore this population. I fully support delisting this GYE population of grizzly bears. Great job USFWS!	FWS-R6-ES-2016-0042-2637	
The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and fish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations."	303	302			Delisting	The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS. HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for delisting. In my opinion, HSUS is again correct. Look at the brutal treatment and killing contests involving wolves in these same three states. It is ugly and awful to be a Montanan who treasures wildlife and yet state governments want to use them for "sport" and as a profit center. FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS says, the agency says it looks forward to hearing from the public about delisting. The truth is, the public has already made it's views known; A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to	FWS-R6-ES-2016-0042-2695	

When grizzlies were listed as "threatened" in 1975, the greater Yellowstone population was estimated at 300 bears. Due to coordinated efforts by federal and state resources agencies mandated by the ESA, cooperative research, monitoring, habitat protections and regulatory mechanisms, including a strict hunting ban, their numbers have grown over the past 30 years to slightly more than 600 bears today, according to U.S. Fish and Wildlife's bear recovery coordinator, Chris Servheen. This is a success story that must be acknowledged and celebrated. Å However, there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. Å	301				Delisting Grizzly deaths on rise in Montana The grizzly bear once roamed free throughout the Western states, including 52 of California's 58 counties. Abundant in the Central Valley and North Bay in the 1800s, California grizzlies were also seen feasting on decaying whale carcasses along the shores of Monterey Bay. The last grizzly in California was shot by hunters in the 1920s, although it remains the familiar icon on our state flag. In state after state, ranchers and hunters wiped out local populations, until they were isolated in but a few small ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the greater Yellowstone population was estimated at 300 bears. Due to coordinated efforts by federal and state resources agencies mandated by the ESA, cooperative research, monitoring, habitat protections and regulatory mechanisms, including a strict hunting ban, their numbers have grown over the past 30 years to slightly more than 600 bears today, according to U.S. Fish and Wildlife's bear recovery coordinator, Chris Servheen. This is a success story that must be acknowledged and celebrated. However, there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders from unauthorized access to trophy hunting to start killing bears that might wander into their jurisdictions I object to delisting the grizzly bear from the endangered species list. Barring that, the delisting does not need to be accompanied by the legalization of trophy hunting for the following reasons: AS WE SAW WITH SCARFACE, BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. In 2015, record number of Yellowstone area grizzly bears were killed despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. Additionally, there are ranchers right outside of Yellowstone (in MT) who are practicing wildlife sustainable ranching. Rather than give ranchers a license to kill, can't we first ask that they try these methods? The economic impact of grizzlies being road friendly in Yellowstone is huge. Once they start being hunted, they will become less road friendly and there will be fewer visitors to Yellowstone. IF HUNTING IS ALLOWED, THERE MUST BE BUFFER ZONES around national parks and a no-hunt zone in between Yellowstone and Grand Teton National Park, minimally, and up through the Tom Miner Basin area in Montana. CLIMATE CHANGE NEEDS TO BE CONSIDERED. Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated at least one food source. USFWS needs to consider how climate change will impact bears' food sources and behavior. USFWS failed to do this with Wolverines and had to have a court order USFWS to consider climate change in wolverine listing. Additionally, we can't say that we are being environmentally responsible and kill off apex predators. The environment does not stop with the flora but is equally impacted by the fauna, particularly apex predators. MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The outcry over the killing of Cecil the Lion by many Americans will be repeated here. We cannot object to the killing of Cecil and then less than a year later sanctify the right of hunters to do the exact same thing in the U.S. STATE CONFLICTS OF INTEREST. The states have not shown that they can work together to manage their apex predator populations, and several officials of the surrounding states have indicated that they wish to eradicate apex predators from their areas. These creatures don't know where state lines begin and end, and some of the most natural habitats for grizzlies are in decidedly unfriendly states.	FWS-R6-ES-2016-0042-2891	
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FWS-R6-ES-2016-0042-2859	

Thirdly, the mortality rate of 61 in 2015 (https://www.usgs.gov/data-tools/2015-known-and-probable-grizzly-bear-mortalities-greater-yellowstone-ecosystem) does include some of these cubs (10 to be exact) so it would be double counting to say the birth rate minus the death rate is a true number. But the report also states that 1 bear dies for 2 that are documented, so 61 deaths could be something like 90 deaths. The mortality rate is likely to increase. The very high mortality rate of 2015 will become the rule, not the exception. And that's before delisting and before hunting is allowed. There are minimal investigations into bear killings, and minimal deterrents (fines, imprisonment). Hunters and ranchers are killing bears with impunity. For example the killer of "Scarface" is still not known. In addition there are increased killing of conflict bears by USFWS and the Game & Fish departments as bears look for food further afield. In summary 59 bears born and survive each year and a mortality rate of around 90 means the population is declining and will continue to decline.	301				Delisting	I oppose removing the GYE Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. With current birth rates and mortality rates, the grizzly bear population is in decline. More bears are being killed than are being born. The numbers I use below are taken from an IGBST study in September 2012 ("Updating and evaluating approaches to estimate population size and sustainable mortality limits for Grizzly bears in the Greater Yellowstone Ecosystem" - http://nrm-sc.usgs.gov/files/norock/IGBST/GYGBMonMortWksRpt2012(2).pdf) Firstly it notes that the population has grown between zero and 2.2% from 2002 to 2012. Meaning minimal growth. Your own scientists are telling you that the population is static at best. Secondly - Assuming there are 714 grizzlies in 2016, which IBSGT state is the number. 27% of these are females of 5 and over that can give birth to young. They give birth to an average of 2 cubs every 3 years. The survival rate of the cubs is 55%. So that gives a population increase of 59 bears per year. $714 \times 27\% = 192$ reproducing females, $192/3 = 64$ bears giving birth in a year, Average 2 cubs per cycle = 108, Survival rate of 55% = 59 young bears born and survive each year. Thirdly, the mortality rate of 61 in 2015 (https://www.usgs.gov/data-tools/2015-known-and-probable-grizzly-bear-mortalities-greater-yellowstone-ecosystem) does include some of these cubs (10 to be exact) so it would be double counting to say the birth rate minus the death rate is a true number. But the report also states that 1 bear dies for 2 that are documented, so 61 deaths could be something like 90 deaths. The mortality rate is likely to increase. The very high mortality rate of 2015 will become the rule, not the exception. And that's before delisting and before hunting is allowed. There are minimal investigations into bear killings, and minimal deterrents (fines, imprisonment). Hunters and ranchers are killing bears with impunity. For example the killer of "Scarface" is still not known. In addition there are increased killing of conflict bears by USFWS and the Game & Fish departments as bears look for food further afield. In summary 59 bears born and survive each year and a mortality rate of around 90 means the population is declining and will continue to decline. I oppose removing the GYE Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife	FWS-R6-ES-2016-0042-2989	
2. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted.	301				Delisting	As someone who has enjoyed the GTNP for over 30 years. I'm very concerned about the proposed delisting. Here are a few more reasons not to delist the Grizzlies, Please consider. 1. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly oppose delisting and hunting of these bears, which they consider to be sacred animals. We need to listen to them. 2. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted.	FWS-R6-ES-2016-0042-3087	

I believe that the USFWS failed to comply with executive and secretarial orders that effects on Native American religious or cultural tradition be considered when proposing changes to the ESA, and that the trophy hunts proposed in the state management plans that are necessary for federal delisting would be a violation of the American Indian Religious Freedom Act. The USFWS did not seek input from all of the 31 tribes recognized for historical ties to the GYE when drafting its latest delisting proposal, nor did it consider those tribes unanimous opposition to state management plans that include trophy hunting when they sought out the USFWS. By ignoring these comments and going forward with a delisting proposal contingent on state management plans that include trophy hunting, the USFWS has disrespected these native people and cultures, to say nothing of federal law.	303				Delisting	I am against the U.S. Fish and Wildlife Service's (USFWS) proposal to remove the Greater Yellowstone Ecosystem's (GYE) population of grizzly bears from U.S. Endangered Species Act (ESA) protection. I believe that the USFWS failed to comply with executive and secretarial orders that effects on Native American religious or cultural tradition be considered when proposing changes to the ESA, and that the trophy hunts proposed in the state management plans that are necessary for federal delisting would be a violation of the American Indian Religious Freedom Act. The USFWS did not seek input from all of the 31 tribes recognized for historical ties to the GYE when drafting its latest delisting proposal, nor did it consider those tribes unanimous opposition to state management plans that include trophy hunting when they sought out the USFWS. By ignoring these comments and going forward with a delisting proposal contingent on state management plans that include trophy hunting, the USFWS has disrespected these native people and cultures, to say nothing of federal law. In the past, we have removed other species from Endangered Species Act protection without the need for a subsequent hunting season. This includes the American bald eagle. In 2007, nobody was calling for a bald eagle hunting season, because shooting a bald eagle would be a disgustingly disrespectful act towards an icon of our country. But for sovereign native nations like the Apsaalooke', the Piegan, the Nee-Me-Poo, and others, the grizzly bear is more than just an icon, it is kin. These people deserve greater respect than to allow sport hunting of their kin. There are many other reasons to be against delisting, but this one is good enough for me.	FWS-R6-ES-2016-0042-5405	
After all I have read I wonderf if the delisting is being done for political, not scientific reasonsof course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that I sternly oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. A	303				Delisting	We must immediately stop the U.S. Fish and Wildlife Service (USFWS) from removing the grizzly bear in the Greater Yellowstone EcosystemMontana, Idaho and Wyomingfrom the Federal Lists of Endangered and Threatened Wildlife. They must not delist the Yellowstone grizzly bear.. Critics of the USFWS proposal say that lifting protections for the bear could endanger a growing population, and a lot of the US Public believe that also. The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to an estimated 700 or more today. But grizzly bears have all but disappeared from almost all of the continental United States, except for Yellowstone and Glacier National Park and a few other slivers of habitat, the New York Times reported May 3. After all I have read I wonderf if the delisting is being done for political, not scientific reasonsof course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that I sternly oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. We cannot let humans jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. I also read that the author of the report that led to the delisting proposal, Dr. Christopher Servheen, grizzly bear recovery coordinator, U.S. Fish and Wildlife Service, admits private land development is the greatest threat to the nation's grizzlies, as further development could cut off connectivity among populations and disrupt vital habitat. Please do what is right and scientifically backed and don't delist the grizzly bear because it would be the beginning of the end for them. Thank you for your time and consideration on this very important issue.	FWS-R6-ES-2016-0042-3441	

It's my understanding that (Sec. 4(a)(1)(D)) of the ESA requires adequacy of existing regulatory mechanisms **before** animals can be removed from the endangered species list. If Montana has only listed today the hunting regs they are going to use once the grizzlies are delisted, how much time could the USFWS possibly have had to study that plan to determine its adequacy? The impression i'm getting is that they're just a great big bunch of "good ole boys" who make a wild arse guess then do whatever they please because there isn't anyone that can stop them.	303				Delisting	It's my understanding that (Sec. 4(a)(1)(D)) of the ESA requires adequacy of existing regulatory mechanisms **before** animals can be removed from the endangered species list. If Montana has only listed today the hunting regs they are going to use once the grizzlies are delisted, how much time could the USFWS possibly have had to study that plan to determine its adequacy? The impression i'm getting is that they're just a great big bunch of "good ole boys" who make a wild arse guess then do whatever they please because there isn't anyone that can stop them.	FWS-R6-ES-2016-0042-3475	
Totally against removing grizzly bears from endanger list. Only if one becomes a nuisance bear. It takes long to establish normal population and if a virus or something effects them, then it will be better to have a good population. Or if at one point when population doubles then, establish else where.					Delisting	Totally against removing grizzly bears from endanger list. Only if one becomes a nuisance bear. It takes long to establish normal population and if a virus or something effects them, then it will be better to have a good population. Or if at one point when population doubles then, establish else where. Attachments first q partner report	FWS-R6-ES-2016-0042-3482	

Let me begin by saying that reducing protections for any population of grizzly bears is absolutely unwise, ludicrous and will backfire into a orgy of killing and extinction that is already plaguing this and all other apex predators worldwide.	301				Delisting	Greetings wildlife managers, Thank you for accepting my comments to your agency's proposed delisting of the Yellowstone Grizzly bear population. Let me begin by saying that reducing protections for any population of grizzly bears is absolutely unwise, ludicrous and will backfire into a orgy of killing and extinction that is already plaguing this and all other apex predators worldwide. Ecological security for brown/grizzly bears and essentially all other apex predators worldwide is rapidly evaporating due to continued rapid human population growth and development in areas where brown/grizzly bears had previously flourished, creating islands of habitat that will shortly isolate and extinguish bear populations. Apex predators (tigers, bears, wolves etc) are in serious decline worldwide due to the very same pressures that have unravelled the Yellowstone (and all other) grizzly/brown bear populations. Grizzly/brown bears are absent in Mexico, most of north America and throughout Europe and Asia where they have flourished up until this last century. It is absolutely imprudent to take any step that does not further safeguard this species. Like the tremendously ugly fight and delisting (that required congressional riders from the republican congress) for several north American wolf population, it is clearly evident that these efforts are being fueled by powerful hunting and ranching interests possessing vast political influence, not the best interest of the species, ecosystem or the human population. Just because this sub-population of bears has risen slightly above their near extirpation levels several decades ago, they are absolutely still in a serious state of risk and decline across the landscape. Development, road use, food availability (partially due to the significant loss of whitebark pine in and around the ecosystem and competition with sporthunters and ranchers for other food sources). Mortality of grizzly/brown bear in and around the Yellowstone ecosystem has remained high due to road/railroad mortality, poaching, lethal control (ranchers etc), and conflicts with deer and elk hunters. In my view, management of an extremely vulnerable species like the Yellowstone grizzly should be carried out using a serious precautionary premise where no protections are lifted for the species and efforts are vastly escalated to connect bear populations, reduce conflicts with hunters and ranchers, end road/railroad mortality and prevent all further development/habitat loss of adjacent habitats associated with Yellowstone. If delisting of this majestic species occurs during the Obama administration, the legacy of a failed and bloodied conservation effort will be a blight on the memory of your agency and the presidency. I implore you to suspend efforts to reduce protections (delist) for this species and to reverse course and focus unprecedented resources	FWS-R6-ES-2016-0042-3520	
Listen to the voices of scientists who have appealed to your poor and biased decision to remove the bears from esa protection. Listen to the comments from the public which are overwhelmingly against delisting Grizzlies.	302				Delisting	I am opposed to delisting the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal list of endangered species. The decision is premature and does not adequately factor in the decline of their main food sources due to climate change. There is no scientific reason to hunt Grizzly Bears, they are slow to reproduce and need protection, not targets on their back for the benefit of the constantly declining special interests of trophy hunters. Listen to the voices of scientists who have appealed to your poor and biased decision to remove the bears from esa protection. Listen to the comments from the public which are overwhelmingly against delisting Grizzlies. Stop listening to the diminished and shrieking voices of the minority who find pleasure in killing public wildlife for their own sick personal benefit.	FWS-R6-ES-2016-0042-3525	

The Grizzly population is too vulnerable to delist and the decision to delist is not based on the best available science. Further, the majority of Americans oppose delisting. A national poll shows that the majority of voters oppose the U.S. Fish and Wildlife Service (FWS) proposal to remove grizzly bears in the Greater Yellowstone Ecosystem from the list of federally threatened and endangered species (55 percent oppose and 26 percent support). In addition, the poll showed that more than two thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming (68 percent oppose to 20 percent support); a similar two-thirds majority supports the idea of a 5 - year moratorium on trophy hunting to ensure the full recovery of the grizzly bear population (67 percent support to 20 percent oppose). For these reasons please do not delist the Greater Yellowstone Grizzly Bears from the Endangered Species Act.	301				Delisting	I strongly oppose The USFWS's proposal to delist the Greater Yellowstone Grizzly Bears. The Grizzly population is too vulnerable to delist and the decision to delist is not based on the best available science. Further, the majority of Americans oppose delisting. A national poll shows that the majority of voters oppose the U.S. Fish and Wildlife Service (FWS) proposal to remove grizzly bears in the Greater Yellowstone Ecosystem from the list of federally threatened and endangered species (55 percent oppose and 26 percent support). In addition, the poll showed that more than two thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming (68 percent oppose to 20 percent support); a similar two-thirds majority supports the idea of a 5 - year moratorium on trophy hunting to ensure the full recovery of the grizzly bear population (67 percent support to 20 percent oppose). For these reasons please do not delist the Greater Yellowstone Grizzly Bears from the Endangered Species Act.	FWS-R6-ES-2016-0042-3626	
Basically, those wanting to hunt Grizzlies are just looking for their next fix to make themselves feel powerful. Why would anyone delist an animal just for Trophy hunting?	302				Delisting	I'll keep this short and sweet...there is no logical reason to remove Grizzly bears from the endangered species list. At this point, the population is still small enough that they could easily become endangered or extinct if hunting them occurs and any other detrimental environmental effects occur. Basically, those wanting to hunt Grizzlies are just looking for their next fix to make themselves feel powerful. Why would anyone delist an animal just for Trophy hunting? There is no benefit to the bears, the ecosystem, or the hunters.	FWS-R6-ES-2016-0042-4072	

The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing.	303	301			Delisting	No one really knows how many grizzlies are in the GYE. The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foods, are a threat to the grizzly's long term survival. The bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine which is a critically important food source." Climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future " the	FWS-R6-ES-2016-0042-4226	
Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. A	301				Delisting	#NAME?	FWS-R6-ES-2016-0042-4274	

TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states known for their hatred and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and most Americans (55%) oppose delisting. Even more Americans (68%) oppose hunting of grizzly bears if delisted. A	301				Delisting	#NAME?	FWS-R6-ES-2016-0042-4274	
The power and push of the states to grant hunting rights to the wealth few to increase revenue is offset by themoney spent by others to see wild Grizzlies. I live in a state that had, or may have them and I feel the sorrow of their absence.	302				Delisting	I am writing you to request that you not de-list the Grizzly Bear from the ESA, Climate change's effect on the food sources of the Yellowstone ecosystem are profound. They alone are reason enough never to de-list the Yellowstone Grizzly. The white bark pine nuts are a major Grizzly food source, and have all but disappeared from Yellowstone due to higher winter temp- eratures. The white bark pine is also found in high remote unoccupied areas where the female Grizzly can feed undisturbed. Army cutworm moths, another Grizzly food source found in high talus fields are being pushed north out of Yellowstone by rising temperatures, and pesticide spraying in the plains states. As the weather gets hotter and dryer it stresses the vegetation and grasses the base animals depend on, causing a decline in the food quality for Elk, Bison and rodents, all bear food source. Cutthroat Trout are also disappearing, after the appearance of Lake Trout in Yellowstone lake. The efforts to eradicate the Lake trout have been expensive and un-successful. Grizzly bear mortality by all causes (human and natural) is precarious at best. Sport(Trophy) hunting can easily push bear mortality past the brink of recovery. The Grizzly bear reproductive rate is extremely low making any recovery very slow,(Kind of like the white bark pine). Once Grizzly deaths exceed births you are headed towards extinction. De-listing would accelerate this and the proposed controls are to slow reacting to properly ward this off. The Grizzly bear population has leveled out in recent years and the cause of this leveling off should be identified by further research. The power and push of the states to grant hunting rights to the wealth few to increase revenue is offset by the money spent by others to see wild Grizzlies. I live in a state that had, or may have them and I feel the sorrow of their absence. Thank you for the chance to present a few random thoughts.	FWS-R6-ES-2016-0042-4505	

Next I fear the "opportunity" to hunt is driving the States plans (Wyoming, Idaho and Montana), rather than the "protecting and preserving of Grizzly Bears". I do not trust my own, or the other two, to properly manage an animal fresh of the Endangered Species List. It has been demonstrated again and again that the citizens of these three States, as well as the country at large, do not want to see Grizzly Bear managed down to the bottom line number. It terrifies me to think how quickly we could lose the foot hold the Bears barely have at this point in time. And then you add in the fact we really have no idea how many Bears there actually are.	303				Delisting	To: Sally Jewell, Secretary, U.S. Department of the Interior Daniel Ashe, Director, U.S. Fish and Wildlife Service From: Cindy Campbell, Grizzly Bear 760 Community, Wilson, Wyoming As a resident of Teton County, Wyoming, I had the privilege of attending the meeting of The Yellowstone Ecosystem Subcommittee of the Interagency Grizzly Bear Committee last November in Teton Village, Wyoming. During the two days of sessions I learned a great deal about the state of affairs of the Grizzly Bear population in my home, the Greater Yellowstone Ecosystem. I also heard a great deal of what I question is truly "best science available". This subjective term used to explain away certain "information", mostly about monitoring of these Grizzly Bears (who live in my backyard) left me feeling confused. I cannot understand certain rational which has been incorporated into this ruling. One area that astounds me is the Population Monitoring System. I do not know of any other arena, be it government budgets, wildlife management, business endeavors or a banking decision, where a 40% variance (F. van Manen, IGBST, November 4, 2016, Teton Village, Wyoming) in your baseline number is accepted as "best science available". This raises much concern. The original number IBSC has calculated will in fact be the foundation upon which the Great Grizzly Bear is managed for decades to come. We demand to know with 100% certainty that the accuracy of this baseline number is flawless. If IBSC does not have it exactly right from the beginning, it will have detrimental consequences for decades to come. A 40% variance is not acceptable in any situation, especially determining if and when Grizzly Bear are ready to be delisted. Next I fear the "opportunity" to hunt is driving the States plans (Wyoming, Idaho and Montana), rather than the "protecting and preserving of Grizzly Bears". I do not trust my own, or the other two, to properly manage an animal fresh of the Endangered Species List. It has been demonstrated again and again that the citizens of these three States, as well as the country at large, do not want to see Grizzly Bear managed down to the bottom line number. It terrifies me to think how quickly we could lose the foot hold the Bears barely have at this point in time. And then you add in the fact we really have no idea how many Bears there actually are. It would be completely in line with the "best science available" to not hunt Grizzly Bears. These Bears are a national treasure and it is beyond the pale to think that a Trophy Hunt is in their future. Most Americans will not tolerate seeing the much acclaimed "Recovered Grizzly Bear" population being trophy hunted. I do not feel any of the parties involved in preparing this ruling have done nearly enough to educate those living close to and with Grizzly Bears. Tolerance and acceptance is key to their	FWS-R6-ES-2016-0042-5494	
The proposal to delist the Yellowstone grizzly is premature. The American taxpayer has invested \$100s of millions, bringing back this magnificent species from the threshold of extinction. However, recovery while promising, remains tenuous and delisting of the Yellowstone grizzly bear is premature. To delist now is to waste the enormous trust and taxpayer dollars the American people have placed in the U.S. Fish and Wildlife Service.	301				Delisting	The proposal to delist the Yellowstone grizzly is premature. The American taxpayer has invested \$100s of millions, bringing back this magnificent species from the threshold of extinction. However, recovery while promising, remains tenuous and delisting of the Yellowstone grizzly bear is premature. To delist now is to waste the enormous trust and taxpayer dollars the American people have placed in the U.S. Fish and Wildlife Service. Grizzly bears are making a slow recovery thanks only to protection of the Endangered Species Act. However, they remain vulnerable due to shifting food sources, isolation, and an increase in preventable conflicts with hunters and livestock. All of these issues need to be addressed prior to delisting. Now is NOT the time to strip the grizzly of ESA protections. The perceived recovery is too tenuous. Delisting will reverse any hard fought and very expensive gains. The ESA and the FWS still has more work to do. Please do your work and do NOT delist. Please see my full document that I've attached. There were too many characters to use this space. If for some reason, my document is not attached, please contact me at the number or email below. I've spent a bit of time on it and want my comment to be considered.	FWS-R6-ES-2016-0042-5542	

IT IS RECKLESS TO DELIST THE GRIZZLIES because their survival is precarious, at best, due to continued habitat encroachment, loss of key foods, increased mortality rates and low rate of reproduction.	301				Delisting	I strongly oppose removing the Greater Yellowstone Grizzly bears from the protections afforded under the Endangered Species Act! That such a notion is even being contemplated is shocking. According to the best scientific evidence available, any plan to delist the Grizzlies is unjustified, reckless, and unconscionable. IT IS UNJUSTIFIED TO DELIST THE GRIZZLIES because they are not recovered. While USFWS claims that there are 700 grizzly bears in the Greater Yellowstone Ecosystem, this is a contested figure. Grizzly bears have not recovered across a significant portion of their range and should not be delisted. IT IS RECKLESS TO DELIST THE GRIZZLIES because their survival is precarious, at best, due to continued habitat encroachment, loss of key foods, increased mortality rates and low rate of reproduction. IT IS UNCONSCIONABLE TO DELIST THE GRIZZLIES because lifting the federal protections will allow state-sponsored trophy hunting. USFWS, as Guardians of the Greater Yellowstone Grizzlies, you have a fiduciary responsibility to protect these bears. Please do not betray that trust by delisting them from the Endangered Species Act.	FWS-R6-ES-2016-0042-5627	
Given the unknown impacts of climate change and changing food sources, and given that we've spent 40 years restoring the grizzly to the GYE, why rush now into delisting just to shoot bears. Why not wait another 5 or 10 years to see the impacts of changing foods and why the population has remained flat?5. Referring to #4, this year over 50 bears died in the ecosystem, more than 1/2 from human conflicts. Bears are one of the slowest reproducing mammals in North America. With delisting comes hunting and more bears killed, indiscriminately. A female bear will at best in 10 years just duplicate herself. We cannot afford to have female bears hunted. A female without cubs in tow will just look like a male to a hunter.6. There needs to be more responsibility in the delisting mandate placed on protecting human food sources. I live in bear country and at one time the WG&F had some funds to subsidize bear garbage cans so they were only \$50. That money ran out years ago and a bear proof garbage can for a homeowner is \$150. No one would buy that. Also there are many rough campgrounds without any bear boxes on FS lands. And dispersed camping is allowed and many of those campsites people burn their trash, which leaves odors. People are not educated about their bird feeders, nor protecting their grain. There needs to be a requirement that the states subsidize these protections, and also federal funding on federal campgrounds for bear boxes and/or bear proof garbage cans.	301				Delisting Factor B	I do not support delisting grizzlies at this time because: 1. Genetic connectivity has not been assured. Bears outside the DMA will not be counted toward the total amount. These are the bears that will be the ones moving north to ensure connectivity. These will be the bears easiest for hunters to kill. 2. The delisting rules do not require livestock owners to take any responsibility for preventative measures. Certain areas of the DMA, in particular the Green River, have seen a lot of livestock problems with bears. This is because there are too many cattle and sheep on public lands in the main corridor for grizzlies traveling south into the Wind River range which is excellent habitat. This issue is not addressed in your delisting mandate and will just result in additional dead bears. 3. It is not clear whether the reason the bear population has remained flat since 2002 is because, as some scientists claim, bear habitat is full in the GYE or, as other scientists say, the main food sources of the bears is drying up and they are moving out to find new food sources. Bears in the GYE are unique in their food sources--pine nuts, moths, cutthroat trout. Especially the pine nuts for fattening up for hibernation is the most important food source. 90% of our whitebark pine trees are functionally dead in the ecosystem. The impact on the bears is still not clear and so delisting is premature. 4. Given the unknown impacts of climate change and changing food sources, and given that we've spent 40 years restoring the grizzly to the GYE, why rush now into delisting just to shoot bears. Why not wait another 5 or 10 years to see the impacts of changing foods and why the population has remained flat? 5. Referring to #4, this year over 50 bears died in the ecosystem, more than 1/2 from human conflicts. Bears are one of the slowest reproducing mammals in North America. With delisting comes hunting and more bears killed, indiscriminately. A female bear will at best in 10 years just duplicate herself. We cannot afford to have female bears hunted. A female without cubs in tow will just look like a male to a hunter. 6. There needs to be more responsibility in the delisting mandate placed on protecting human food sources. I live in bear country and at one time the WG&F had some funds to subsidize bear garbage cans so they were only \$50. That money ran out years ago and a bear proof garbage can for a homeowner is \$150. No one would buy that. Also there are many rough campgrounds without any bear boxes on FS lands. And dispersed camping is allowed and many of those campsites people burn their trash, which leaves odors. People are not educated about their bird feeders, nor protecting their grain. There needs to be a requirement that the states subsidize these protections, and also federal funding on federal campgrounds for bear boxes and/or bear proof garbage cans. 7. I	FWS-R6-ES-2016-0042-0029	

Trigger Text	Code(s)	Full Comment Text	Form Letter/Document ID
Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved.	Distinct Population Segment	and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states - Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal	GYC

as well as by their isolation from other grizzly populations. Historically, grizzlies ranged from Alaska to Mexico, with at least 50,000 bears living in the western half of the contiguous United States. Today only about 1,500 to 1,700 grizzlies survive outside Alaska, in five isolated populations in the northern Rocky Mountains and the Cascades.	Distinct Population Segment	around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. Preserving federal protections for grizzly bears is paramount to species' survival BY GARY CARTER SPECIAL TO THE DAILY CALLAST UPDATED APRIL 1, 2016 Comment 3 In 1805, the explorers Meriwether Lewis and William Clark, making their way across the West, were warned by Native American tribes of grizzly bears' awesome strength. At first, Lewis scoffed at the tribes' advice, writing in his journal that "in the hands of skillful riflemen they are by no means as formidable or dangerous as they have been represented." A few terrifying encounters with the bears, though, changed his mind about that. A little more than a century later, crowds at Yellowstone National Park would gather in delight to watch the bears dine on food scraps. Signs were marked "Lunch Counter ... for Bears Only." Those days are long gone, but crowds still flock to Yellowstone -- nearly 4 million visitors every year -- partly to catch a glimpse of the storied creatures. The grizzly bears that live in and around Yellowstone make up almost half the population in the lower 48 states, and now those bears are at risk. In 2015, their numbers in the Yellowstone area declined by 40, to an estimated 717 from 757 -- a 6 percent drop that represents the highest one-year mortality since grizzlies were given federal protection in 1975. Despite this decline, the U.S. Fish and Wildlife Service is currently preparing to strip the animals of their Endangered Species Act protection. The agency is under pressure from the states around Yellowstone -- Wyoming, Montana and Idaho -- to allow hunting of bears that roam outside the park's boundaries. Now, the proposal to call the bears recovered and remove their protection is imminent. If the rule is finalized, it's likely to allow states to reduce bear numbers by more than 100 practically overnight. But the bears are already struggling, threatened by declines in important foods such as white-bark pine and Yellowstone cutthroat trout, as well as by their isolation from other grizzly populations. Historically, grizzlies ranged from Alaska to Mexico, with at least 50,000 bears living	Humane Society Petition
Because listing the grizzly as a distinct population segment (DPS) is possibly illegal, because it precludes the bears seeking connectivity.	Distinct Population Segment	years, meeting working in Yellowstone National Park. We have explored by foot thousands of miles of trails into some of the most breathtaking landscapes on earth, filled with the suite of native wildlife that we so love and respect. We have seen many grizzly bears over the decades and no animal is more powerful in the public's sensibility than the Great Bear. It is our state animal, picked by Montana school children. Our native tribes greatly value the grizzly bear as do all of us who value our wild places and wildlife. The grizzly bear is greater than life; it represents all that we as a people almost lost and what we have preserved. We value our large predators, our carnivores, because they remind us that we share life together in this time and place. They represent the wilderness we almost lost. We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best: Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data. Because the ecosystem is becoming stressed by climate change causing dramatic changes in food supplies needed. Because all foods are not equal. Because grizzlies are being killed at a rate the slowly-reproducing animals cannot tolerate long-term; since 2002 the population has probably declined. Because connectivity with other bears depends upon GYE grizzlies roaming and hunting would preclude that. Because human caused mortality is mostly avoidable and prevention is not stressed enough. Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable. Because sport trophy hunting of grizzly bears would be abhorrent and would reverse recovery. Because tolerant bears that people see around the parks would be the first killed. Because wildlife watchers are ignored by state wildlife agencies and the USFWS. Just look at wolf and bison management. Because tribal interests are ignored by state wildlife agencies. Because wildlife watching brings in far more economically than does hunting in GYE states. Because listing the grizzly as a distinct population segment (DPS) is possibly illegal, because it precludes the bears seeking connectivity. Because the GYE grizzly bear lives on an ecological island. Because politics trumps science every time. We	FWS-R6-ES-2016-0042-0422

Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE.	Distinct Population Segment	firm contention that grizzly bears should not be delisted in the Greater Yellowstone Ecosystem. Actual numbers of grizzly bears are merely estimates as are the numbers required to support a sustainable populations for one of the slowest-reproducing mammals in North America with female grizzlies giving birth only every three years, if conditions are right. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399 would be threatened by the delisting. FWS could well see more than 40 years of recovery efforts squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. By the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range and grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. The management of isolated populations of free-ranging carnivores like grizzly bears and wolves is	FWS-R6-ES-2016-0042-5116
As science has evolved and improved, so has our understanding of the important aspects of grizzly management. Also, based on the best scientific and commercial data available it is clear that the GYE grizzly bear population is discrete from other grizzly bear populations and significant to the remainder of the taxon and meets the definition of a DPS under the act.	Distinct Population Segment	Threatened Wildlife. After a review of document FWS-R6-ES-2016-0042, Proposed Rule; Endangered and Threatened Species, Exports, Imports, Reporting and Recordkeeping Requirements, Transportation, I am convinced we can confidently move ahead with the de-listing. This document thoroughly discusses the history of the grizzly bear species, it's habitat, nutritional needs, and challenges to it's continued survival. It reviews the history of the recovery process and sites volumes of reports and analysis, by experts in the field, of the ongoing status of the grizzly. Recovery criteria were established and indeed met and maintained since 2004. As science has evolved and improved, so has our understanding of the important aspects of grizzly management. Also, based on the best scientific and commercial data available it is clear that the GYE grizzly bear population is discrete from other grizzly bear populations and significant to the remainder of the taxon and meets the definition of a DPS under the act. Regarding the issue of whitebark pine nuts, as part of the grizzly bear diet, I site the Food Synthesis Report (IGBST 2013). Grizzly Bears are extremely omnivorous and display great diet plasticity, shifting and switching food habits according to their availability. There are over 260 species of foods consumed by grizzly bears in the GYE. This ability to eat a wide variety of foods makes them a generalist species. After years of studies, new feeding strategies have continued to appear annually. While whitebark pine seed has been identified as one of the components of a grizzly bear's diet, which can indeed influence reproductive and survival rates. However, it has been revealed through study that there is no correlation between long term survival with a decline in whitebark pine availability. The report found that grizzly bear selection of white bark pine nuts had actually decreased between 2000 and 2011. Movement rates had not changed, as well as body size and condition during times of decreased availability of the nut. There continued to be a consistent litter size following poor white bark pine years. Nearly one third of grizzly bear home ranges in the GYE do not contain any whitebark pine. Grizzly bears have shown themselves to be very resilient and adaptable! Over the years, grizzly bear recovery has been developed, revised and modified according to new scientific studies, data and methods. The grizzly bear recovery story is truly one of success, that represents the hard work of many people, using the best science available. This will not end with	FWS-R6-ES-2016-0042-5171

I disagree with the notion of separating the Greater Yellowstone Population of bears from the other populations in the northern Rockies, and delisting only the GYE bear population. Grizzly recovery goals should be based on a larger ecosystem. Given the ecological disruptions that we know will occur on an increasing basis due to climate change, successful grizzly recovery will depend on connecting existing populations, and managing them as a whole.	Distinct Population Segment	See Attached Attachments Weiner Gary	FWS-R6-ES-2016-0042-1229
FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. But under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE.	Distinct Population Segment	and that's enough to delist them. But no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claims that the shortage of cutthroat trout and whitebark pine nut is one of the grizzly's primary food sources is not a threat to the grizzly's long term survival. But this is not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. But under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. FWS claims that the agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. But when David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the	FWS-R6-ES-2016-0042-1611

I like the idea of classifying these grizzlies as Greater Yellowstone Ecosystem grizzlies because they are completely separate from grizzlies found elsewhere. They are extremely protected in the park and there population is not at risk of declining.	Distinct Population Segment	See attached file(s) Attachments Delist the Grizzly	FWS-R6-ES-2016-0042-1716
Throughout the FWS's report and specifically on page 111 it is stated that the GYE grizzly population has stabilized in growth since 2002, signaling a reach of carrying capacity. In this scenario density-dependent factors influence population growth the most. This indicates the population is recovered and at sustainable levels, a testament to the success of the ESA. The ultimate test for success is removal of a species from the ESA, and it seems that the GYE DPS is ready for this action.	Distinct Population Segment	Service, I fully support delisting the Grizzly Bears of the Greater Yellowstone Ecosystem's distinct population segment. Nothing is so unique as traveling in remote, primeval backcountry inhabited by grizzly bears, and I do not feel that delisting will threaten this experience. Throughout the FWS's report and specifically on page 111 it is stated that the GYE grizzly population has stabilized in growth since 2002, signaling a reach of carrying capacity. In this scenario density-dependent factors influence population growth the most. This indicates the population is recovered and at sustainable levels, a testament to the success of the ESA. The ultimate test for success is removal of a species from the ESA, and it seems that the GYE DPS is ready for this action. I have traveled much in the Thorofare region of the GYE and have had many encounters with grizzlies. I revel in these experiences, and while frightening, it makes one realize his own insignificance in the face of raw wilderness. One is forced to be better prepared, more aware, and more observant. It is a true wilderness experience that is only found in a few special places. However, it also has seemed to me that these encounters are unnaturally high, and the bears have seemed desperate. I have found carcasses where one bear has killed another, and been in situations where many bears flocked to one elk carcass. It seems that the bears are a detriment to each other, and its time for them to be professionally regulated to some degree. The debate of delisting seems to center on the proposal of Wyoming, Montana, and Idaho to implement carefully regulated hunting seasons of grizzly bears. Many critics warn of dramatic declines of numbers caused by "anti-carnivore" state agencies allowing trophy hunting. However, upon reading of the report and Conservation Strategy one will see hunting will be highly regulated based upon population wide numbers and mortality. Females with young will not be hunted, and very specific percentages of population will be available for discretionary mortality. In short, the guidelines for regulated hunting are specific under the report, starting on page 111. Moreover, it is likely that removing some males from the population will result in less inter-killings and therefore higher rates of sub-adult survival. In reality state based management has resulted in robust populations of all game species throughout the country. Revenue generated will help with continued study and management of the grizzlies. There are no indications that hunting will cause grizzly populations to dramatically decline to pre-	FWS-R6-ES-2016-0042-1802

In a modern day society the need does not exist for the hunting of big game animals like bears. It took 41 years for the population of Grizzlies to triple in size. How long do you think it will be before that population size has been tripled down in size due to releasing the hunting measures. The best conservation policy would be one that is beneficial for the citizens of this country, the grizzlies, visitors to the park, and residents of the occupying states. Removing the grizzlies from GYE and replacing them to DPS is one move, but allowing Grizzlies to be hunted again is a horrific idea for all of those that admire the freedom of wildlife.	Distinct Population Segment	We absolutely should keep the door shut on hunting of grizzlies near the Yellowstone region. If we open those doors hunting these bears will be like opening the flood gates of a damn. It will soon be big game and remove any protections for wildlife in the area. This should be looked at for it's possible social ramifications in society as well. We are living in a society where cell phone usage is the highest it has ever been. Children and adults are spending less time outside and more time watching television of browsing the internet. We need to be able to keep the wildlife here in America protected. It's an important aspect of teaching children and adults alike about our past history, ecosystem, preservation of natural habitats. In a modern day society the need does not exist for the hunting of big game animals like bears. It took 41 years for the population of Grizzlies to triple in size. How long do you think it will be before that population size has been tripled down in size due to releasing the hunting measures. The best conservation policy would be one that is beneficial for the citizens of this country, the grizzlies, visitors to the park, and residents of the occupying states. Removing the grizzlies from GYE and replacing them to DPS is one move, but allowing Grizzlies to be hunted again is a horrific idea for all of those that admire the freedom of wildlife. I encourage you to reconsider letting natural habitats of the land be subject to the mercy of guns, bows, traps, and a number of hunting devices that put the bears at a natural disadvantage.	FWS-R6-ES-2016-0042-2133
FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS.	Distinct Population Segment	includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS. HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. In my opinion, HSUS is again correct. Look at the brutal treatment and killing contests involving wolves in these same three states. It is ugly and awful to be a Montanan who treasures wildlife and yet state governments want to use them for "sport" and as a profit center. FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS says, the agency says it looks forward to hearing from the public about delisting. The truth is, the public has already made it's views known; A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to	FWS-R6-ES-2016-0042-2695

While their numbers have risen to more than 600 individuals, the bears are geographically isolated, and threats to their habitat and food supplies are daunting. Most environmental groups, including the Sierra Club and the Natural Resources Defense Council, as well as wildlife biologists, are urging the U.S. Fish and Wildlife Service to abandon the delisting plan as premature.	Distinct Population Segment	protection threaten to reverse a 30-year recovery that has resulted in doubling the bears' population in the greater Yellowstone ecosystem. If left to "management" by the states, trophy hunting of these magnificent animals in places like Wyoming and Montana will likely follow. While their numbers have risen to more than 600 individuals, the bears are geographically isolated, and threats to their habitat and food supplies are daunting. Most environmental groups, including the Sierra Club and the Natural Resources Defense Council, as well as wildlife biologists, are urging the U.S. Fish and Wildlife Service to abandon the delisting plan as premature. The grizzly bear once roamed free throughout the Western states, including 52 of California's 58 counties. Abundant in the Central Valley and North Bay in the 1800s, California grizzlies were also seen feasting on decaying whale carcasses along the shores of Monterey Bay. The last grizzly in California was shot by hunters in the 1920s, although it remains the familiar icon on our state flag. In state after state, ranchers and hunters wiped out local populations, until they were isolated in but a few small ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the greater Yellowstone population was estimated at 300 bears. Due to coordinated efforts by federal and state resources agencies mandated by the ESA, cooperative research, monitoring, habitat protections and regulatory mechanisms, including a strict hunting ban, their numbers have grown over the past 30 years to slightly more than 600 bears today, according to U.S. Fish and Wildlife's bear recovery coordinator, Chris Servheen. This is a success story that must be acknowledged and celebrated. However, there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young,	FWS-R6-ES-2016-0042-3004
2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate grizzlies from other populations into the GYE to improve genetic diversity, but this has not occurred.	Distinct Population Segment	in the GYE for the following reasons: 1. Fact is, no one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services computer generated numbers. But, what we do emphatically know is that at least 60 grizzlies died last year and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest reproductive rate of any mammal in the GYE. The continuation of such high mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work is needed in the GYE to prevent many of unnecessary grizzly deaths before this population can be safely delisted. Such actions as requiring ranchers to relocate their garbage and carcass dumps to secure county facilities, the use of bear-proof garbage cans in communities within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for public land users, and stiffer penalties for illegal killings need to be employed within the GYE prior to grizzlies being delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate grizzlies from other populations into the GYE to improve genetic diversity, but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat and prevent them from colonizing other lands in which they were originally found. This "discouragement" will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of the land grizzlies would be "discouraged" from is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other	FWS-R6-ES-2016-0042-3124

Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups like WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE.	Distinct Population Segment	which include the following: FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted, but they barely survive in 4% of their historic range in the lower 48 states. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups like WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. Also, even with protections, 59 grizzlies were killed in 2015. Another reason the grizzly should not be delisted is the fact that wildlife watchers pay millions of dollars each year to come to Yellowstone to see wolves and bears. I am a part of that statistic. Yellowstone National Park was our first established park and it is a national heritage. I, as a wildlife watcher, have just as much right to see grizzlies in the wild running free and safe as do trophy hunters have to kill them. Only difference is my activity doesn't take away from others. It is a rare treat to see a grizzly in the park while they are protected. I can only imagine the decline in sightings once they are delisted. If grizzlies can't be seen many tourist will find no reason to visit Yellowstone anymore. Tourist dollars will decline. All our favorite bears that we have followed for years and years will be targeted. #399, a 20 year old sow is already lined up in several hunter's scopes. Is it because she would be a great trophy on a wall? NO!! In fact she is targeted because she is loved by thousands of adoring watchers that have watched her raise cubs over the years. They want to kill her just to hurt her admirers. One important thing I want to point out is that there is this misconception that some seem to think that if there is a hunting season for grizzlies then there will be more tolerance towards them. That is so far from the truth. They said that about the wolves, as well, and look at the mass hatred that builds stronger and stronger each	FWS-R6-ES-2016-0042-4218
Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide. Therefore, the grizzly bear cannot be delisted in just the GYE.	Distinct Population Segment	claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. However, David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. In reality, no one really knows how many grizzlies are in the GYE. Furthermore, population growth has stagnated since the early 2000's, and the Yellowstone grizzly population declined by 59 bears in 2015 alone. The USFWS also claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide. Therefore, the grizzly bear cannot be delisted in just the GYE. By USFWS own estimates, around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Furthermore, Yellowstone's Grizzly population has no connectivity with outside populations, and has not for the last 100 years. This means that today's population came from a gene pool of only 136 animals (the population low point in 1975. This lack of genetic diversity threatens the Yellowstone grizzly's survival in the long term. USFWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. Whitebark pine nuts have long been considered to be the single most important food source for grizzlies. In the last 20 years, whitebark pines have been decimated by both blister rust and pine beetles. The pine beetle epidemic has been linked to climate change. According to Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council, "Yellowstone grizzly bears are likely declining in the wake of the loss of whitebark pine, a critically important food source." USFWS claims that Montana, Idaho, and Wyoming will successfully use hunting to manage the recovered grizzly bear population.If GYE grizzly bears are delisted, the three states have already signaled that they will open up trophy hunting seasons for the bears. Wyoming holds the vast majority of grizzlies. I do not believe that Wyoming can be	FWS-R6-ES-2016-0042-4260

Trigger Text	Code(s)	Full Comment Text	Form Letter/Document ID	Annotation Notes
Despite positive demographic trends since ESA listing of the GYE grizzlies, this population remains severely isolated, which will jeopardize the long-term viability of this population until some connectivity can be established with other populations.	Factor A	I am writing to urge you to maintain federal ESA listing for grizzly bears in the Greater Yellowstone Ecosystem (GYE) -- a high-profile population that we as a nation have invested in since 1975. The FWS estimates a GYE grizzly population of about 700 animals, but this is the census size (N). The science of conservation genetics (in which I have some expertise) tell us that the most important number is not N, but rather the "effective population size" (Ne) - basically the number of individuals that successfully reproduce each generation. Depending on the sex ratio and age structure of sexually mature individuals, the number of breeding adults will be LOWER to FAR LOWER than the census size, and in terms of genetic health and long-term viability of a population, THIS IS WHAT COUNTS. (We have learned this the hard way with the Florida Cougar!). Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. - - Despite positive demographic trends since ESA listing of the GYE grizzlies, this population remains severely isolated, which will jeopardize the long-term viability of this population until some connectivity can be established with other populations. Without some assurance that surrounding states can protect bears that attempt to disperse, should ESA restrictions be lifted, this listing should be maintained. Artificially moving GYE bears to other populations (Northern Rockies) and vice-versa may be necessary in the short term, but this amounts to "ecologically baby-sitting" and is not a long term strategy. Corridors must be developed and then maintained long enough to document successful dispersal and reproduction by bears into and out of the GYE, and then delisting would be justified. I hope you will reconsider the delisting proposal and keep the GYE bears protected until they can become part of a larger meta-population group. - - Sincerely,	CBD	
If we don't make the protection of bears a priority, we may not get another chance. Even the most conservative estimates are predicting a 75% loss of animal species within the span of 3 human lifetimes (see US News and World Report, 6/19/15, "75% of Animal Species to be Wiped Out in Sixth Mass Extinction")! The best thing you could do is connect the isolated bears of Yellowstone with corridors to other bear populations.	Factor A	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - If we don't make the protection of bears a priority, we may not get another chance. Even the most conservative estimates are predicting a 75% loss of animal species within the span of 3 human lifetimes (see US News and World Report, 6/19/15, "75% of Animal Species to be Wiped Out in Sixth Mass Extinction")! The best thing you could do is connect the isolated bears of Yellowstone with corridors to other bear populations. It would be a crime against nature and humanity to allow hunters or ranchers to kill any of the magnificent Grizzlies struggling to survive. Every bear is important to maintain a healthy, genetically diverse population. Also, a - small population of bears has little chance to adapt to a quickly changing environment and declines in their traditional food sources. - Sincerely,	CBD	
These bears are facing threats of a lower food supply and being killed should they roam outside the park.	Factor A	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list - - These bears are facing threats of a lower food supply and being killed should they roam outside the park. Please do all you can to preserve these magnificent animals.. - - Sincerely,	CBD	

states do not have regulations in place to protect bears that could connect with bears in other areas.	Factor A	First, I am Wildlife Biologist, former state (Maine and Everglades) and federal. The following is written by Center for Biological Diversity. i have read it and agree wholeheartedly. I will go further by saying that the CBD has become the most effective wildlife conservation entity in America. You are the lead agency responsible for effecting the Endangered Species Act of 1973, and you will be held responsible. - - I know it is not easy and with the Republican interests attacking the ESA more aggressively than ever, it is becoming more difficult. But the right decisions must still be made, regardless of how difficult. - - Following the CBD's words. - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 - and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears.	Factor A	Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities. Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 -- and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears. - - The plan presents a potentially tremendous setback. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - - Yellowstone's bears have also long been isolated from other bear populations, forcing the government to keep them on permanent life support by proposing to truck in bears to avoid health issues caused by inbreeding. This fact further highlights the need for recovering grizzlies in more places. - - I am asking the Service to maintain protections for Yellowstone grizzly bears. If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts - - .I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
Protected corridors are needed for bears to migrate for mates and food. Genetic diversity of the Greater Yellowstone Ecosystem grizzlies is below levels needed to maintain these bears. less bears	Factor A	As a biologist and environmental scientist specializing in ecosystems, I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Bears, especially males, need relatively large territories, especially when searching for mates and food, especially when the seasons change, or if the climate is impacting their food sources. Also, the Greater Yellowstone Ecosystem grizzlies are a genetically isolated group needing access to more territory and other populations of bears. Protected corridors are needed for bears to migrate for mates and food. Genetic diversity of the Greater Yellowstone Ecosystem grizzlies is below levels needed to maintain these bears. less bears. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	

Also, more conservation and preservation of forested, quiet rural buffer zones is needed in SE TN, N GA historic areas such as that of Apison, E. BRainerd, E. Hamilton, Summit, Collegedale, Harrison - Bay State park area and into Ooltewah, McDonald, Lebanon, Flint Springs, Blue Springs, Oak Grove, Red Clay State Historic park area and areas around these such as Cohutta, Cherokee Valley Ga and more, all need to be protected from ongoing forced ex/sub/urbanization and/or rezoning of these lands into other kinds of landuses.	Factor A	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Also, more conservation and preservation of forested, quiet rural buffer zones is needed in SE TN, N GA historic areas such as that of Apison, E. BRainerd, E. Hamilton, Summit, Collegedale, Harrison - Bay State park area and into Ooltewah, McDonald, Lebanon, Flint Springs, Blue Springs, Oak Grove, Red Clay State Historic park area and areas around these such as Cohutta, Cherokee Valley Ga and more, all need to be protected from ongoing forced ex/sub/urbanization and/or rezoning of these lands into other kinds of landuses. These areas are upon a large sinkhole which has not opened up yet, and waters flow through this major drainage basin, providing waters for the Coosa, Conasauga, Tallapoosa, waters and also into the Mighty Mississippi river, and so on, providing waters for the many ecosystems which depend on them, and to sustain the wildlife (some endangered/migratory/threatened) that depends on these waters, as well as the humans that use this as their drinking waters, and to sustain local and other economies. These waters which come through and converge in the SE TN, N GA areas have been said to be subject to sudden widespread contamination and these areas in SE TN, N GA areas should be allowed to remain as sparsely populated rural areas, permanently, so as not to pollute these waterways or bring possible sources of contamination closer to them. These areas listed above, do not need more forced ex/sub/urbanization, or to have their roads enlarged, widened, or made into highways, interstates, or made into layered roadways, etc., adding pollution to these natural resource rich areas, needlessly. - These areas need to remain quiet, peaceful backwoods, natural rural buffer zones, allowing for more landscapes, and forested to be conserved and preserved for many generations to come. - It has also become concerning in and around these above areas, that there is more lightning strikes happening than ever before in and around these areas, which are having more underground utilities, such as water, sewer/gaslines, and highspeed (or highvoltage) EPBhighspeed fiber optic internet being placed in more areas-could any of these things be the cause of the increased lightning strikes, one of which hit so severely that it blew up te road (in another country as reported via the news). This is concerning both for the public health of the people and the wildlife concerned. - We need more public awareness and education related to the above issues, as many people that live rural and/or in higher population areas, need to understand that kind of possible danger, and also, the need to	CBD	
removing protections for Yellowstone grizzlies is premature. These bears must be allowed to roam and reconnect with other populations without being hunted and shot. - This plan presents a potentially tremendous setback for the grizzlies. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems	Factor A	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - removing protections for Yellowstone grizzlies is premature. These bears must be allowed to roam and reconnect with other populations without being hunted and shot. - This plan presents a potentially tremendous setback for the grizzlies. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
We are depending on you to keep our protections in place for one of our most treasured American animals safe. - NO ONE wants to turn our parks or their surrounding areas into dangerous hunting grounds. We are better than that. This park is our prized example of good regulations and management. Please do all you can to keep it that way. - - What is needed is more funding to protect all the visitors and animals in Yellowstone .	Factor A	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. We are depending on you to keep our protections in place for one of our most treasured American animals safe. - NO ONE wants to turn our parks or their surrounding areas into dangerous hunting grounds. We are better than that. This park is our prized example of good regulations and management. Please do all you can to keep it that way. - - What is needed is more funding to protect all the visitors and animals in Yellowstone. - Sincerely,	CBD	

The grizzly is a top predator (except for humans) in that environment and preserving them has been shown to have significant and far-reaching benefits to the ecology of the area, including restoring the meandering nature of rivers, which helps local areas withstand extreme weather patterns better. - -	Factor A	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - The grizzly is a top predator (except for humans) in that environment and preserving them has been shown to have significant and far-reaching benefits to the ecology of the area, including restoring the meandering nature of rivers, which helps local areas withstand extreme weather patterns better. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
It would be a relatively simple solution to the problem of bear (and other migrating species) isolation to provide forested corridors between bear populations to provide access between currently separated groups.	Factor A	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - It would be a relatively simple solution to the problem of bear (and other migrating species) isolation to provide forested corridors between bear populations to provide access between currently separated groups. Given the nature of the terrain of bear habitat selected areas could easily be those seldom traveled by man to avoid conflict between species maintaining the current protected status of the bears would provide further protection for these magnificent animals. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
There should be a corridor that provides them with the ability to roam and breed all the way up to Canada where I live	Factor A	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population your country has invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. There should be a corridor that provides them with the ability to roam and breed all the way up to Canada where I live. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. That is what national parks are for, and why many of us visit them (on both sides of the border). - - Sincerely,	CBD	
It is my understanding, from a PBS special I recently watched, that efforts are underway to develop methods for facilitating the healthy maintenance of isolated wildlife populations -- such as the grizzlies -- by providing safe "corridors" through which they can connect with one another. I urge you to avoid delisting these bears to allow time for wildlife protection groups to determine how the grizzlies may be successfully managed	Factor A	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem. As I am sure you know there have been ongoing efforts since 1975 to protect this population. Recently, however, it has been in decline due to a rise in human-caused mortality of these iconic bears. Allowing surrounding states to manage these bears and to permit trophy hunting will add significant pressure to this animal group. In addition, this population remains severely isolated from other grizzly groups and states do not have regulations in place to protect bears that wander outside an arbitrary boundary in search of food, territory and/or mates. These animals are likely to be killed. - It is my understanding, from a PBS special I recently watched, that efforts are underway to develop methods for facilitating the healthy maintenance of isolated wildlife populations -- such as the grizzlies -- by providing safe "corridors" through which they can connect with one another. I urge you to avoid delisting these bears to allow time for wildlife protection groups to determine how the grizzlies may be successfully managed -- so that their groups will be healthy and robust once federal protections are removed. - It is my firm belief -- a belief that is supported by scientific evidence -- that every species has a unique purpose in maintaining a well-balanced ecosystem. It is only after we humans have facilitated the extinction of certain animals that we have learned what that purpose was. By then it is too late to bring back a lost group. - - Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	

Grizzlies and other species need paths created which will connect all grizzlies (and others) with every grizzly habitat in the western U.S. and Canada to prevent inbreeding and deaths caused when trying to cross highways and other man-made obstacles	Factor A	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope—they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Grizzlies and other species need paths created which will connect all grizzlies (and others) with every grizzly habitat in the western U.S. and Canada to prevent inbreeding and deaths caused when trying to cross highways and other man-made obstacles. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in West—they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely, Michael Tinsley	Endangered Species Coalition	
There are so few left, we killed most of them and continue to encroach on their habitat. Global warming adds to destruction as well	Factor A	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. There are so few left, we killed most of them and continue to encroach on their habitat. Global warming adds to destruction as well First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope—they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in West—they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	
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First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope. They should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears therein.	Factor A	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been an amazing Endangered Species Act success story. However, after reading it today, I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope. They should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears therein. Secondly, please create a delay in the onset of any grizzly bear hunting for several years, post-delisting, to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Especially there, we should definitely treat them as our neighbors, not merely as game animals. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. This should be standard policy in national parks and forests. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in West. I know they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	
Wildlife protection status is not just about a species any longer. Advances in scientific studies, projects, and programs over the past two decades demonstrate the interdependence of species in maintaining diverse ecological systems. More importantly, we need every inch, every foot, every acre of wild lands and our waters to be protected, managed, and sustained in the face of a transforming world and accelerating climate change	Factor A	Dear Director Ashe, In the past few weeks a number of threatened or endangered species, including macaws, have been proposed to be removed from any type of protection status. Wildlife protection status is not just about a species any longer. Advances in scientific studies, projects, and programs over the past two decades demonstrate the interdependence of species in maintaining diverse ecological systems. More importantly, we need every inch, every foot, every acre of wild lands and our waters to be protected, managed, and sustained in the face of a transforming world and accelerating climate change. Intrusions of private entities on public lands is no longer tolerable. Ranchers and farmers receiving federal subsidies—that is taxpayer subsidies, individuals slaughtering wildlife for entertainment should be reined in. Our wild life, including the grizzly bears, require continued protection. These lands and animals and ecologies and environments belong to all Americans. New strategies and new policies are needed for the future. The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope—they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in West—they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	
Plans need to identify the funding to pay for maintaining a healthy grizzly bear population. - Protect core habitat. - Reduce conflicts and maintain stable numbers of bears. - Create connections between bears, and coordinate bear management across the region	Factor A	My comments on the proposed delisting rule. Please put the proposed rule on hold. State grizzly bear management plans are out dated and unfounded. Our nation needs to plan to protect the places where bears live. Habitat has dwindled and needs be protected. The Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming, planning to hunt bears, do not have a sustainable coordinated plan. I oppose grizzly bear hunting. There is no over abundance of bears. Questionably, the challenges for a sustainable may never be overcome due to the current habitat limitations and interactions with humans. Grizzly bears are worth more alive than dead. Especially bear #399 and #610. I would think they would be the first shot since their habits are well know for leaving the park. That would be tragic and possibly trigger more that a government agency would want to, or afford to, deal with. Those bears are beloved by all. Plans need to identify the funding to pay for maintaining a healthy grizzly bear population. - Protect core habitat. - Reduce conflicts and maintain stable numbers of bears. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	

Population growth, along with increased visitor usage, is applying growing pressure to bears in the region	Factor A	I am opposed to plans to delist Grizzly Bear in the Yellowstone Ecosystem. The bear has made a outstanding rebound from the days when numbers were very low, that cannot be denied and many agencies and organizations deserve credit for this impressive turnaround. But I fear that this recovery could be fragile. Population growth, along with increased visitor usage, is applying growing pressure to bears in the region. Environmental factors are also applying pressure to the bears' food sources and they will likely get worse rather than better in the years to come. While I believe delisting is a good goal, I don't think the time is right yet - let's give the great bear time to adjust to these growing pressures before we subject them to delisting and then a possible hunting season. Thank you, John Preston Bozeman, MT	GYC	Human Pressures on habitat.
Improving corridors to connect populations, and other habitat protection measures need to be funded and in place.	Factor A	Please accept my comments on the proposed delisting rule. Please do not delist grizzly bears. There certainly should not be hunting allowed, as there are already many deaths per year. It is better to wait than to jump into this, since we do not know how climate change will affect them, with wildfire destroying habitat, new diseases, heat stresses on water and impacts yet to be seen and understood. Improving corridors to connect populations, and other habitat protection measures need to be funded and in place. Thanks,	GYC	
BEARS MUST BE ALLOWED TO ROAM LARGE AREAS AND MIX WITH DIFFERENT POPULATIONS FOR GENETIC DIVERSITY. LET THEM LIVE .	Factor A	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. GRIZZLY BEARS ARE AN INTEGRAL PART IN ECOSYSTEMS. THEY ARE INTELLIGENT ANIMALS, WHO, WHEN GIVEN THE CHANCE, PREFER TO BE AWAY FROM HUMANS. WE MUST LEARN TO LIVE NEXT TO THEM, AND NOT HUNT THEM AT ALL. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. BEARS MUST BE ALLOWED TO ROAM LARGE AREAS AND MIX WITH DIFFERENT POPULATIONS FOR GENETIC DIVERSITY. LET THEM LIVE. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	

But habitat loss threatens bears and all wildlife that co-resides with them. Protecting grizzly bear habitat requires effective habitat science. Foundations like Vital Ground conserve crucial inter-habitat linkage areas. These safe wildlife corridors are what bears depend on as they move to find each other and reproduce. Critical habitat conservation helps assure grizzly bear survival. Without it, U.S. grizzly bears face extinction in the lower 48 states. Conserving vital habitat protects nature's irreplaceable grizzly bears. Because: Where the Grizzly Bear still walks, the Earth is healthy and whole .	Factor A	Please accept my comments on the proposed delisting rule. America's magnificent grizzly bear is a national treasure. But habitat loss threatens bears and all wildlife that co-resides with them. Protecting grizzly bear habitat requires effective habitat science. Foundations like Vital Ground conserve crucial inter-habitat linkage areas. These safe wildlife corridors are what bears depend on as they move to find each other and reproduce. Critical habitat conservation helps assure grizzly bear survival. Without it, U.S. grizzly bears face extinction in the lower 48 states. Conserving vital habitat protects nature's irreplaceable grizzly bears. Because: Where the Grizzly Bear still walks, the Earth is healthy and whole. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet soup agencies involved. The Service needs to promise all of us who care about the great bear	GYC	
There needs to be a corridor from Yellowstone to the Yukon (the Y to Y project). Please support that so that the grizzly population can become self sustaining, with or without people, with or without special protections, as part of a natural ecosystem. They need to be able to travel to find food and other non-related bears.	Factor A	Please accept my comments on the proposed delisting rule. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. The country's grizzly bears are almost all habituated to humans, with most willing to co-exist and not harm us. They normally do not see people as food or as harmful. Hunting them is taking unfair advantage and needlessly killing creatures that we can live in harmony with. When a bear becomes a danger to people or animals, then it can be removed from the population. Include a campaign to change people's attitudes first. Protect core habitat. There needs to be a corridor from Yellowstone to the Yukon (the Y to Y project). Please support that so that the grizzly population can become self sustaining, with or without people, with or without special protections, as part of a natural ecosystem. They need to be able to travel to find food and other non-related bears. - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. -Maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. Maintaining a stable population will depend on the grizzly's food supply in a human-free habitat, which is in great fluctuation now. Commit to reducing conflicts. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. A campaign and bear-proof garbage containers to start. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other agencies involved. Many volunteers and local groups are ready, willing, and able to help. Please change the proposed plan for the better. Show that we have learned how to manage wildlife better over these past years when we didn't do so well. Take the words 'extermination', 'killing', 'removing', and 'reducing the population' out of your dictionary. It's our country too and many of us love to see grizzly bears.	GYC	

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Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other agencies involved. Many volunteers and local groups are ready, willing, and able to help.	Factor A	Please accept my comments on the proposed delisting rule. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. The country's grizzly bears are almost all habituated to humans, with most willing to co-exist and not harm us. They normally do not see people as food or as harmful. Hunting them is taking unfair advantage and needlessly killing creatures that we can live in harmony with. When a bear becomes a danger to people or animals, then it can be removed from the population. Include a campaign to change people's attitudes first. Protect core habitat. There needs to be a corridor from Yellowstone to the Yukon (the Y to Y project). Please support that so that the grizzly population can become self sustaining, with or without people, with or without special protections, as part of a natural ecosystem. They need to be able to travel to find food and other non-related bears. - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. -Maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. Maintaining a stable population will depend on the grizzly's food supply in a human-free habitat, which is in great fluctuation now. Commit to reducing conflicts. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. A campaign and bear-proof garbage containers to start. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other agencies involved. Many volunteers and local groups are ready, willing, and able to help. Please change the proposed plan for the better. Show that we have learned how to manage wildlife better over these past years when we didn't do so well. Take the words 'extermination', 'killing', 'removing', and 'reducing the population' out of your dictionary. It's our country too and many of us love to see grizzly bears.	GYC	

1) Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities.	Factor A	It is obvious that the grizzly bear delisting proposal is totally unscientific! It is done in a sloppy way, and is far too important to go forward when basic data is not available or not in relevant form. 1) state grizzly bear management plans need to be updated. 2) National forests need to amend their plans to protect the places where bears live. 3) Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Also, delisting means that grizzlies will be hunted and wiped out in Idaho, Montana, and Wyoming. That is completely counter to what we, the American Public want on the public lands we own. We completely oppose grizzly bear hunting - the bears are majestic, awe-inspiring symbols of the wild, not trophies. And from a tourism perspective, bears are worth more alive than dead. Taken together, the states' Bear Management Plans are not coordinated and not updated. 1) Wyoming's Plan violates federal law in proposing to assume authority on private land in-holdings within park boundaries. 2) Montana's plan doesn't commit to allowing separate bear populations to connect with each other. 3) Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Where is the funding for all this? State bear management plans for maintaining a healthy grizzly bear population need to show how the updated plans will be paid for!! To summarize the important points -- 1) Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. 2) Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. 3) Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. Until the Park Service promises to fulfill these basic tools for healthy bear management, we and the American Public cannot support any delisting proposal, period!!	GYC	
3) Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. Until the Park Service promises to fulfill these basic tools for healthy bear management, we and the American Public cannot support any delisting proposal, period!!	Factor A	It is obvious that the grizzly bear delisting proposal is totally unscientific! It is done in a sloppy way, and is far too important to go forward when basic data is not available or not in relevant form. 1) state grizzly bear management plans need to be updated. 2) National forests need to amend their plans to protect the places where bears live. 3) Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Also, delisting means that grizzlies will be hunted and wiped out in Idaho, Montana, and Wyoming. That is completely counter to what we, the American Public want on the public lands we own. We completely oppose grizzly bear hunting - the bears are majestic, awe-inspiring symbols of the wild, not trophies. And from a tourism perspective, bears are worth more alive than dead. Taken together, the states' Bear Management Plans are not coordinated and not updated. 1) Wyoming's Plan violates federal law in proposing to assume authority on private land in-holdings within park boundaries. 2) Montana's plan doesn't commit to allowing separate bear populations to connect with each other. 3) Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Where is the funding for all this? State bear management plans for maintaining a healthy grizzly bear population need to show how the updated plans will be paid for!! To summarize the important points -- 1) Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. 2) Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. 3) Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. Until the Park Service promises to fulfill these basic tools for healthy bear management, we and the American Public cannot support any delisting proposal, period!!	GYC	

Montana's plan doesn't commit to allowing separate bear populations to connect with each other.	Factor A	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	
I am also concerned that there are no buffer zones established around the national parks. This has been a big problem for wolves and bison which stray outside the park boundaries and are then "legally" shot by hunters. Tourists from all over the world visit our western parks specifically to see iconic species, grizzly bears, wolves and bison in their natural habitat; these animals do not recognize artificial borders. Do not be swayed by the vocal hunting and ranching lobby which is motivated by short term goals and profit. Grizzly bears currently inhabit only a tiny fraction of their historic range. Any proposal to delist them from ESA protection is premature.	Factor A	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. I am also concerned that there are no buffer zones established around the national parks. This has been a big problem for wolves and bison which stray outside the park boundaries and are then "legally" shot by hunters. Tourists from all over the world visit our western parks specifically to see iconic species, grizzly bears, wolves and bison in their natural habitat; these animals do not recognize artificial borders. Do not be swayed by the vocal hunting and ranching lobby which is motivated by short term goals and profit. Grizzly bears currently inhabit only a tiny fraction of their historic range. Any proposal to delist them from ESA protection is premature. Further, the current proposal is seriously flawed. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The	GYC	

More thought needs to be given to the effect of climate change on bear numbers and survival	Factor A	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. - More thought needs to be given to the effect of climate change on bear numbers and survival. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	
Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities.	Factor A	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	

Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change.	Factor A	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	
Please accept my comments Delist the grizzly bears. I have seen them in the Lander foothills . There are too many of them and need to be delisted. They affect my hunting, horses, livestock negatively. We have plenty in the Yellowstone environment. I do not want them around the Lander area!	Factor A	Please accept my comments Delist the grizzly bears. I have seen them in the Lander foothills . There are too many of them and need to be delisted. They affect my hunting, horses, livestock negatively. We have plenty in the Yellowstone environment. I do not want them around the Lander area!	GYC	
I support the Yellowstone to Yukon corridors for reuniting and allowing the genetic mixing of various grizzly populations .	Factor A	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal one governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. I support the Yellowstone to Yukon corridors for reuniting and allowing the genetic mixing of various grizzly populations. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	

As for any conflict with livestock, you have to remember that grizzlies are native animals and have been here for thousands of years. Cattle and sheep were imported from Europe and are therefore non-native. Grizzlies belong in the West and cattle and sheep do not.	Factor A	Please accept my comments on the proposed delisting rule. There is absolutely no need to delist grizzlies and then allow them to be hunted. No one can eat a grizzly and killing for the fun of it is just plane stupid. I've spent a lot of time observing grizzlies and they are majestic animals that are a symbol of the wildness still remaining in the West. As for any conflict with livestock, you have to remember that grizzlies are native animals and have been here for thousands of years. Cattle and sheep were imported from Europe and are therefore non-native. Grizzlies belong in the West and cattle and sheep do not. People who come to the West to see and photograph grizzlies bring in millions of tourist dollars. That money is vital to all small businesses in MT, WY and ID. Thank you for reading my comments.	GYC	Livestock conflicts
Removing their protection at this time likely will put us right back where we started. It has been clearly demonstrated that as a top predator, grizzlies are critically important to the health of the eco system----without them the endemic herbivores such as elk caused degradation of the waterways, as they lacked fear and overgrazed on the banks	Factor A	I am writing to ask that you do not delist Yellowstone grizzly bears. Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered. Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. These bears do not reproduce by having large litters, like cats or dogs. Usually there are one to two offspring and of course in the wild not all cubs reach maturity. Removing their protection at this time likely will put us right back where we started. It has been clearly demonstrated that as a top predator, grizzlies are critically important to the health of the eco system----without them the endemic herbivores such as elk caused degradation of the waterways, as they lacked fear and overgrazed on the banks. Please do not delist this isolated population of bears. They have a right to be there and serve a vital function. Thank you for your consideration.	Humane Society	
All apex predators occupy an important niche and provide an important function toward keeping their ecosystem healthy. The truth of this scientific principle has been amply shown by the re-introduction of wolves to Yellowstone. When Grizzly bears have reached their optimal population, it will stop growing and, like the wolves, will stabilize.	Factor A	I am writing to ask that you do not delist Yellowstone grizzly bears. Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered. Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. All apex predators occupy an important niche and provide an important function toward keeping their ecosystem healthy. The truth of this scientific principle has been amply shown by the re-introduction of wolves to Yellowstone. When Grizzly bears have reached their optimal population, it will stop growing and, like the wolves, will stabilize. Yet, their current numbers suggest that Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society	
We need to stay away from their breeding grounds and let them flourish and get back to the levels that are safe. Please take this request seriously .	Factor A	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. Please do not give these hunters a green light to kill these animals. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. we are creating an environment, that hunters are wiping out the natural environment of the animals that they need to kill and hang on their walls. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. We need to stay away from their breeding grounds and let them flourish and get back to the levels that are safe. Please take this request seriously.	Humane Society Petition	
Human encroachment is devastating on all wild species. I urge you to act so that future generations will be able to appreciate this majestic creature -- not just trophy hunters .	Factor A	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. We need to see more progress in the recovery of bear populations, and it may be that the protections can never be removed. Human encroachment is devastating on all wild species. I urge you to act so that future generations will be able to appreciate this majestic creature-- not just trophy hunters.	Humane Society Petition	Anthropogenically disturbed habitat.

the bears are already struggling, threatened by declines in important foods such as white-bark pine and Yellowstone cutthroat trout	Factor A	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. Preserving federal protections for grizzly bears is paramount to species' survival BY GARY CARTER SPECIAL TO THE DAILY CALLAST UPDATED APRIL 1, 2016 Comment 3 In 1805, the explorers Meriwether Lewis and William Clark, making their way across the West, were warned by Native American tribes of grizzly bears' awesome strength. At first, Lewis scoffed at the tribes' advice, writing in his journal that "in the hands of skillful riflemen they are by no means as formidable or dangerous as they have been represented." A few terrifying encounters with the bears, though, changed his mind about that. A little more than a century later, crowds at Yellowstone National Park would gather in delight to watch the bears dine on food scraps. Signs were marked "Lunch Counter ... for Bears Only." Those days are long gone, but crowds still flock to Yellowstone -- nearly 4 million visitors every year -- partly to catch a glimpse of the storied creatures. The grizzly bears that live in and around Yellowstone make up almost half the population in the lower 48 states, and now those bears are at risk. In 2015, their numbers in the Yellowstone area declined by 40, to an estimated 717 from 757 -- a 6 percent drop that represents the highest one-year mortality since grizzlies were given federal protection in 1975. Despite this decline, the U.S. Fish and Wildlife Service is currently preparing to strip the animals of their Endangered Species Act protection. The agency is under pressure from the states around Yellowstone -- Wyoming, Montana and Idaho -- to allow hunting of bears that roam outside the park's boundaries. Now, the proposal to call the bears recovered and remove their protection is imminent. If the rule is finalized, it's likely to allow states to reduce bear numbers by more than 100 practically overnight. But the bears are already struggling, threatened by declines in important foods such as white-bark pine and Yellowstone cutthroat trout, as well as by their isolation from other grizzly populations. Historically, grizzlies ranged from Alaska to Mexico, with at least 50,000 bears living in the western half of the contiguous United States. Today only about 1,500 to 1,700 grizzlies survive outside Alaska, in five isolated populations in the northern Rocky Mountains and the Cascades. Numbers in the Greater Yellowstone area have increased since the animals were first given federal protection, but they continue to be threatened by climate change and food shortages. Over all, grizzly bears still occupy only 2 to 4 percent of their ancient range in the lower 48 states. In June 2014, we filed a "recovery plan petition" asking the Fish and Wildlife Service to recover grizzlies in more of their historic range, including parts of Colorado and Utah; in December, we further petitioned to reintroduce bears into the Selway-Bitterroot Wilderness in Idaho. The Endangered Species Act requires that a species be protected in each "significant portion of its range" -- the law's intent being not only to temporarily stave off extinction, but also to recover species so they can persist into the	Humane Society Petition	
Grizzly bears are an icon of Yellowstone park. One of their few protected habitats, Yellowstone also has notoriety for being the home of one of North America's largest predators. We need the Grizzly bear to keep this fragile ecosystem balanced. Their majestic presence adds enormously to the lure of Yellowstone park to tourists from around the world. Very few places on earth can visitors experience seeing these amazing large bears. Their protection is vital not only to the health of the ecosystem, but to the interest and experience of visitors from the U.S. and around the world.	Factor A	Grizzly bears are an icon of Yellowstone park. One of their few protected habitats, Yellowstone also has notoriety for being the home of one of North America's largest predators. We need the Grizzly bear to keep this fragile ecosystem balanced. Their majestic presence adds enormously to the lure of Yellowstone park to tourists from around the world. Very few places on earth can visitors experience seeing these amazing large bears. Their protection is vital not only to the health of the ecosystem, but to the interest and experience of visitors from the U.S. and around the world. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	
During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably happened. This totals over 90 bears, or in excess of 12% of the population.	Factor A	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. With the lowest reproductive rate of any mammal in North America, grizzly bears cannot sustain many deaths, especially among adults. Most grizzlies die because people kill them, so controlling the rates at which we kill these animals is crucial. In fact, the ESA has been vital to reducing rates of human-caused grizzly bear mortality. Under the ESA, killing grizzly bears is prohibited except in self-defense situations. Hunting is banned. And poachers have been successfully prosecuted under the Act, with some paying hefty fines. Given the ethos of the states, who appear more interested in appeasing ranchers and hunters, claims that the states would exercise caution after delisting sound facile. We can predict what will happen without the curbing effects of the ESA, as pressure mounts from the politically well-connected few who want to kill more bears. The states are likely to unabashedly react to conflicts, not with compassion but with firepower. Grizzly bears should expect anything but a safety net from the states. There is every reason to believe that, over time, state management will reverse the gains made over the last 40 years of endangered species protections. This is especially likely given the crisis that Yellowstone grizzly bears are facing now. During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably happened. This totals over 90 bears, or in excess of 12% of the population. And this with the federal safety net. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	

Already massive development in the areas surrounding the parks is threatening their survival, as well as that of other animals that need large spaces and migratory routes.	Factor A	Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: These bears will struggle to survive climate change. Already massive development in the areas surrounding the parks is threatening their survival, as well as that of other animals that need large spaces and migratory routes. Now is the time for the government to formally purchase and make forever wild vast tracks of the west, before it is lost forever to development. As large ranches close, it is an opportunity for the federal government to preserve and protect the land, rather than letting it fall to subdivisions and second-home owners. * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Thanks again for considering my comments.	NPCA	
Genetic diversity requires the ability of bears to migrate and reach other populations , currently difficult.	Factor A	Predators are an important part of a healthy ecosystem. With climate change bears face decreased nutrition with the decimation of whole forests by the white bark pine beetle, fungal infestation and lack of the nutritious nuts. Prey species that are affected by climate change must be considered. Genetic diversity requires the ability of bears to migrate and reach other populations , currently difficult.i Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Thanks again for considering my comments.	NPCA	
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Grizzlies are endangered by logging, mining, hunting, trapping, roads and urban encroachment...they MUST maintain their endangered status for their protection.	Factor A	Grizzlies are endangered by logging, mining, hunting, trapping, roads and urban encroachment...they MUST maintain their endangered status for their protection.	WELC	
Are the Parks so desperate for money that they'll let the hunters kill these icons of the wild West? The bears are losing more of their territory every day. Let's give them a break and don't let the hunters shoot them .	Factor A	Grizzly bears are part of our heritage. We have bunches of movies about Mama Bear and her 2 or 3 adorable cubs. Books for kids tell about The 3 Bears. They have been "endangered species" for forty years...and are just now nearly up to desired numbers. So is it the smart thing to do...let the hunters have a field day and take the numbers back to where they have been for 40years..endangered?! Sounds like a little stupid to me. Is there some reason for this? Other than money for licenses? Winning ranchers' approval? What's the rush? It's an amazing thrill to be driving your grandchildren to Yellowstone and have one of them see a real live grizzly bear..and then two little cubs frolicking behind her! Are the Parks so desperate for money that they'll let the hunters kill these icons of the wild West? The bears are losing more of their territory every day. Let's give them a break and don't let the hunters shoot them . Keep the grizzlies protected.	WELC	
This is another apex predator that can self regulate its population if ranchers would pay more attention to taking care of their livestock on public and private land with non lethal deterrents. If they truly cared about their livestock and the loss of money when they lose one to predation they would get a livestock guard dog and use fladry, noise deterrents, and range riders, just like they shuld for the wolves. Believe it or not, more people are getting turned off by eating beef and not just for health reasons.	Factor A	Grizzly bears are still under the ESA in Yellowstone Park. They still need protection so don't strip them of this. Their population has not fully recovered and I am tired of having USFWS tell the taxpayers that these bears need management. This is another apex predator that can self regulate its population if ranchers would pay more attention to taking care of their livestock on public and private land with non lethal deterrents. If they truly cared about their livestock and the loss of money when they lose one to predation they would get a livestock guard dog and use fladry, noise deterrents, and range riders, just like they shuld for the wolves. Believe it or not, more people are getting turned off by eating beef and not just for health reasons.	WELC	

People and bears can coexist. We should not let bears slide back towards extinction because of misplaced political hostility towards these magnificent and beloved creatures. The end result of this proposal will be fewer bears limited to less land and with access to fewer resources necessary for survival.	Factor A	I am writing to urge you to postpone delisting of the Yellowstone grizzly bear population. The proposal to remove Yellowstone grizzly bears from the endangered species list fails to preserve the progress made toward bear recovery. In fact, it will reverse it. The Greater Yellowstone grizzly bear is one of the United States' most iconic species. Held sacred by native communities for thousands of years in the west, the majestic grizzly has become a treasured symbol of our wild heritage. Visitors spend millions of dollars in the region every year, a vital part of many local economies, in the hopes of spotting a magnificent grizzly. The loss of the grizzly would be a loss for the entire region, and a disservice to the wildlife professionals, dedicated conservationists and wildlife advocates who have fought to save them. While grizzlies have made a comeback, their recovery is still a delicate and uncertain effort. Grizzly bears occupy less than 2% of their historic range in the lower 48 and reproduce very slowly, at a rate of only 1-2 cubs every few years. In the Yellowstone region, the growth of the population has stalled since the early 2000s, and there was a 6% decline last year. The proposed rule leaves Greater Yellowstone grizzlies in the crosshairs, as states have made clear their plans to reduce the population, including through trophy hunts. Management of grizzly bears outside of the national parks would be left completely up to the states, which have historically been hostile to bears and other large carnivores. The current proposal would allow states to exceed maximum bear deaths for years before any review, allowing for potentially irreversible damage, and would allow complete eradication of bears in some areas. The loss of female grizzlies to trophy hunters who will not be able to tell the difference between a male and female bear could cause a steep, quick decline before emergency action can be taken. Additionally, the Yellowstone grizzly population remains isolated; further limiting their range and numbers could prevent them from ever connecting to other grizzly populations. People and bears can coexist. We should not let bears slide back towards extinction because of misplaced political hostility towards these magnificent and beloved creatures. The end result of this proposal will be fewer bears limited to less land and with access to fewer resources necessary for survival. For too long, human beings have assumed animals are non-sentient, unintelligent and, therefore, ours to disrespect and exploit as we will. Today, often new research is published that denies humankind's previously arrogant assumptions about other species, and our lack of respect and care must change. Money and politics should not have the weight that they do on what is essentially an ethical question.	WELC	
The lack of connectivity between the Yellowstone population and other grizzly populations is also important for the long-term viability for the bears. Delisting the grizzly bear would only compound this problem.	Factor A	I urge the USFWS to withdraw its premature delisting proposal for the grizzly bear. With the decline of favorite food sources such as white bark pine nuts and cutthroat trout and the yet to be fully understood impact of climate change on this fragile species, the grizzly population in the Greater Yellowstone Ecosystem region should continue to receive federal protection for at least another decade. The lack of connectivity between the Yellowstone population and other grizzly populations is also important for the long-term viability for the bears. Delisting the grizzly bear would only compound this problem. I believe this delisting proposal would be a real step backward in grizzly recovery. Thank you for considering my comments.	WELC	
Conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat.	Factor A	Conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat.	WELC	
The grizzly still only occupies a very tiny percentage of its historical habitat. Until sufficient subpopulation connectivity is established, and grizzly can naturally disperse into the western US, no delisting is appropriate.	Factor A	Greater Yellowstone Ecosystem Grizzlies remain isolated from the main population, and delisting with its consequent state public hunting will so further diminish the genetic diversity of that population, that the delisting will effectively slowly extinguish the species. The grizzly still only occupies a very tiny percentage of its historical habitat. Until sufficient subpopulation connectivity is established, and grizzly can naturally disperse into the western US, no delisting is appropriate. State control of predators has proven to be excessively draconian, turning the tiny remnant predator populations of predators not ESA listed into persecuted and very like nonviable over the long-term, unless permanent bans on public hunting can be established. The grizzly has such a slow reproductive capacity, that this small and fragmented US population MUST remain protected for the foreseeable future, as the few states holding populations cannot be trusted to use science to understand the consequences of their already publicized intents to create a public market for the killing of these important apex predators and scavengers.	WELC	

Grizzly bears occupy less than 2% of their historic range in the lower 48	Factor A	I am writing to urge you to postpone delisting of the Yellowstone grizzly bear population. The proposal to remove Yellowstone grizzly bears from the endangered species list fails to preserve the progress made toward bear recovery. In fact, it will reverse it. The Greater Yellowstone grizzly bear is one of the United States' most iconic species. Held sacred by native communities for thousands of years in the west, the majestic grizzly has become a treasured symbol of our wild heritage. Visitors spend millions of dollars in the region every year, a vital part of many local economies, in the hopes of spotting a magnificent grizzly. The loss of the grizzly would be a loss for the entire region, and a disservice to the wildlife professionals, dedicated conservationists and wildlife advocates who have fought to save them. While grizzlies have made a comeback, their recovery is still a delicate and uncertain effort. Grizzly bears occupy less than 2% of their historic range in the lower 48 and reproduce very slowly, at a rate of only 1-2 cubs every few years. In the Yellowstone region, the growth of the population has stalled since the early 2000s, and there was a 6% decline last year. The proposed rule leaves Greater Yellowstone grizzlies in the crosshairs, as states have made clear their plans to reduce the population, including through trophy hunts. Management of grizzly bears outside of the national parks would be left completely up to the states, which have historically been hostile to bears and other large carnivores. The current proposal would allow states to exceed maximum bear deaths for years before any review, allowing for potentially irreversible damage, and would allow complete eradication of bears in some areas. The loss of female grizzlies to trophy hunters who will not be able to tell the difference between a male and female bear could cause a steep, quick decline before emergency action can be taken. Additionally, the Yellowstone grizzly population remains isolated; further limiting their range and numbers could prevent them from ever connecting to other grizzly populations. People and bears can coexist. We should not let bears slide back towards extinction because of misplaced political hostility towards these magnificent and beloved creatures. The end result of this proposal will be fewer bears limited to less land and with access to fewer resources necessary for survival. For too long, human beings have assumed animals are non-sentient, unintelligent and, therefore, ours to disrespect and exploit as we will. Today, often new research is published that denies humankind's previously arrogant assumptions about other species, and our lack of respect and care must change. Money and politics should not have the weight that they do on what is essentially an ethical question.	WELC	
Human behaviour is already responsible for significant Grizzly Bear mortality-----either directly via illegal hunting or via traffic deaths or indirectly due to their ever shrinking habitat.	Factor A	Please do not support the proposal to delist the Grizzly Bear. Human behaviour is already responsible for significant Grizzly Bear mortality-----either directly via illegal hunting or via traffic deaths or indirectly due to their ever shrinking habitat. Please keep in mind if it is money that is driving this decision, that these iconic animals of our West are worth far more alive -----with specific regard to the tourist industry.	WELC	
Why do we have to keep destroying more and more forests . We have so many houses and apartments new ones that no one can afford and we have older homes than need a small amount of work done that people can get at a small price. Werr running our wildlife into public areas were invading them and their being killed for defending there homes. It needs to stop. .	Factor A	Why do we have to keep destroying more and more forests . We have so many houses and apartments new ones that no one can afford and we have older homes than need a small amount of work done that people can get at a small price. Werr running our wildlife into public areas were invading them and their being killed for defending there homes. It needs to stop. .	WELC	
The bear population will only increase whilst there is enough food, nature will make the alterations herself, without any human intervention.	Factor A	Just stop shooting everything in the US, just because you can! We certainly won't spend our hard earned money visiting your part of the world if you start shooting and trapping bears as well as wolves! We killed all the bears in the UK because we thought we didn't need them and the farmers didn't want them. Now we don't have the choice to reintroduce them and our lives are all the poorer for it, so is the ecosystem. What is the point in correcting the wrong that humans have done in the first place, repopulate an area with its natural inhabitants, enjoy the revenue these animals bring with them, marvel at their existence, admire their beauty, tenacity, grace and skills for survival, only to hunt them down years later because they were successful at reclaiming a part of the planet that was theirs in the first place? It's madness. Having stayed in and around Yellowstone National Park for 6 weeks, we didn't meet one resident that thought bears were an issue, but then wolves aren't either but they too get shot for sport. Thank heavens we have grown up here in the UK and have stopped all forms of hunting for sport or pleasure and you know what, we aren't overrun with foxes or sickly rabbits as predicted. The bear population will only increase whilst there is enough food, nature will make the alterations herself, without any human intervention.	FWS-R6-ES-2016-0042-0220	

The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends.	Factor A	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record) and food sources changing for bears, why are we rushing	FWS-R6-ES-2016-0042-0320	
Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. A	Factor A	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record) and food sources changing for bears, why are we rushing	FWS-R6-ES-2016-0042-0320	Deteriorating habitat

Yellowstone's grizzlies have had zero genetic connectivity with outside populations in the last 100 years. This means that every grizzly in the Yellowstone population today came from a gene pool of only 136 animals (the population low point in 1975). A wildlife population will not survive in the long term without genetic connectivity to promote genetic diversity and avoid the damaging effects that inbreeding can have on a wildlife population. Establishing corridors to allow bears to move between populations in Yellowstone and Glacier will require more protection, not less. Genetic connectivity is an absolute necessity if the Yellowstone grizzly is to survive in the long term and this prospect becomes much more difficult in the absence of ESA protections.	Factor A	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive versus on someone's floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re-introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	
The removal of protections for grizzlies also removes many crucial habitat safeguards. Grizzlies are a true wilderness animal and are dependent on large swaths of undeveloped land. When grizzlies were listed under the ESA, many logging, oil/gas, and tourist developments were stopped to protect the bear. Without protections, these habitat safeguards are removed, and many acres of pristine land in the ecosystem could be opened up to development.	Factor A	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive versus on someone's floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re-introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	

I am writing in opposition to Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife because sufficient consideration has not been given to the providing of corridors for Grizzly Bears in order for the genetic health of the species.	Factor A	I am writing in opposition to Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife because sufficient consideration has not been given to the providing of corridors for Grizzly Bears in order for the genetic health of the species. While there has been some mention of importing bears into the GYE for breeding purposes, this is not the correct policy. At present the Grizzly Bear population if the GYE is cut off from traveling for any purpose of finding suitable habitat for breeding from any other population. If a Grizzly bear were to leave either Yellowstone National Park or Grand Teton National Park for any habitat or breeding needs in order to maintain a viable genetic pool they could or would most likely be killed. And you have not taken sufficient information into consideration regarding our changing climate. Unless you proved safe passage for Grizzly Bears in order to reach viable habitat--which includes food sources necessary to their survival, you should not be opening up Grizzly bears to trophy hunting. There has never been proven the necessity for the killing of Grizzly bears for sport. Killing to remove a bear from incidents caused by humans will most likely to continue because of human desires to encroach on bear territory. Bears are never the problem. Humans are. Until you provide safe passage for Grizzly bears from one gene pool area to another you should not delist them. More than one agency (as I am almost certain you are aware) has opposed delisting based on science. Unless you wish for so few bears that their population is not viable in YNP or GTNP and the GYE you should refrain from putting the Grizzly bear in the cross hairs of a trophy hunter's rifle. You should be demonstrating that you understand what you will be causing by delisting Grizzly bears. No hunter's life depends on a dead Grizzly bear. Grizzly bears depend now on humans for their lives. No human male or female has proven the need to chop off a head and paws and skin a bear to keep his family warm.	FWS-R6-ES-2016-0042-0381	
Because connectivity with other bears depends upon GYE grizzlies roaming and hunting would preclude that. Because human caused mortality is mostly avoidable and prevention is not stressed enough.	Factor A	We have lived, worked and recreated in the Greater Yellowstone Ecosystem (GYE) for almost 40 years, meeting working in Yellowstone National Park. We have explored by foot thousands of miles of trails into some of the most breathtaking landscapes on earth, filled with the suite of native wildlife that we so love and respect. We have seen many grizzly bears over the decades and no animal is more powerful in the public's sensibility than the Great Bear. It is our state animal, picked by Montana school children. Our native tribes greatly value the grizzly bear as do all of us who value our wild places and wildlife. The grizzly bear is greater than life; it represents all that we as a people almost lost and what we have preserved. We value our large predators, our carnivores, because they remind us that we share life together in this time and place. They represent the wilderness we almost lost. We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best: Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data. Because the ecosystem is becoming stressed by climate change causing dramatic changes in food supplies needed. Because all foods are not equal. Because grizzlies are being killed at a rate the slowly-reproducing animals cannot tolerate long-term; since 2002 the population has probably declined. Because connectivity with other bears depends upon GYE grizzlies roaming and hunting would preclude that. Because human caused mortality is mostly avoidable and prevention is not stressed enough. Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable. Because sport trophy hunting of grizzly bears would be abhorrent and would reverse recovery. Because tolerant bears that people see around the parks would be the first killed. Because wildlife watchers are ignored by state wildlife agencies and the USFWS. Just look at wolf and bison management. Because tribal interests are ignored by state wildlife agencies. Because wildlife watching brings in far more economically than does hunting in GYE states. Because listing the grizzly as a distinct population segment (DPS) is possibly illegal, because it precludes the bears seeking connectivity. Because the GYE grizzly bear lives on an ecological island. Because politics trumps science every time. We love our grizzly bears and want them protected from nefarious forces bent upon hunting them. USFWS should listen to the public's concerns, listen to opposing scientists and do the right thing. Do not delist the grizzly bear.	FWS-R6-ES-2016-0042-0422	

1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada.	Factor A	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear. No one	FWS-R6-ES-2016-0042-0456	
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The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development.	Factor A	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear. No one	FWS-R6-ES-2016-0042-0452	
To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan.	Factor A	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear. No one	FWS-R6-ES-2016-0042-0456	

6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development.	Factor A	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear. No one	FWS-R6-ES-2016-0042-0456	
THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc.	Factor A	I do not support the delisting of Grizzly Bears in GYE. THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected.	FWS-R6-ES-2016-0042-5651	
Specifically, my concerns about the delisting are as follows: (1) availability of food for the bears,	Factor A	Delisting the grizzly bear is a misguided decision, and one based on politics, not science. Specifically, my concerns about the delisting are as follows: (1) availability of food for the bears, (2) a multi-year (too long) period needed to verify and take action on the grizzly population drop, (3) a primary conservation zone that is far too small, (4) poor grizzly genetic diversity and U.S. Fish and Wildlife Service's failure to improve the bears' genetics by bringing in an outside grizzly like they said they would do, and (5) removing grizzlies from the fringes will have negative impacts inside the primary zone for dispersal and bear cubs when a large boar is killed (new grizzlies move into his vacant territory and try to kill the bear cubs). In no way is the grizzly bear population in a health enough position to be delisted. Please reconsider this poor proposal and maintain the grizzly on the federal list of endangered and threatened wildlife. Thank you!	FWS-R6-ES-2016-0042-5081	
(3) a primary conservation zone that is far too small,	Factor A	Delisting the grizzly bear is a misguided decision, and one based on politics, not science. Specifically, my concerns about the delisting are as follows: (1) availability of food for the bears, (2) a multi-year (too long) period needed to verify and take action on the grizzly population drop, (3) a primary conservation zone that is far too small, (4) poor grizzly genetic diversity and U.S. Fish and Wildlife Service's failure to improve the bears' genetics by bringing in an outside grizzly like they said they would do, and (5) removing grizzlies from the fringes will have negative impacts inside the primary zone for dispersal and bear cubs when a large boar is killed (new grizzlies move into his vacant territory and try to kill the bear cubs). In no way is the grizzly bear population in a health enough position to be delisted. Please reconsider this poor proposal and maintain the grizzly on the federal list of endangered and threatened wildlife. Thank you!	FWS-R6-ES-2016-0042-5081	

Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures.	Factor A	WHY? IS MY QUESTION! Why in the world would you try to eradicate the Grizzly Bear population again? It is so unfortunate that Fish and Wildlife service doesn't seem to exist to protect the wildlife but to destroy it. You always come up with phony reasons to open fire on anything that moves. I get the feeling that you are a bunch of hunters anxious to pull the trigger legally. Just to refresh your memory: The grizzly bear once roamed free throughout the Western states, including 52 of California's 58 counties. Abundant in the Central Valley and North Bay in the 1800s, California grizzlies were also seen feasting on decaying whale carcasses along the shores of Monterey Bay. The last grizzly in California was shot by hunters in the 1920s, although it remains the familiar icon on our state flag. In state after state, ranchers and hunters wiped out local populations, until they were isolated in but a few small ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the greater Yellowstone population was estimated at 300 BEARS. Due to coordinated efforts by federal and state resources agencies mandated by the ESA, cooperative research, monitoring, habitat protections and regulatory mechanisms, including a strict hunting ban, their numbers have grown over the past 30 years to slightly more than 600 BEARS today, according to U.S. Fish and Wildlife's bear recovery coordinator, Chris Servheen. This is a success story that must be acknowledged and celebrated. I do not have to give you the details about why Grizzlies should remain protected, you know them as well as I do. But just in case: While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as a	FWS-R6-ES-2016-0042-5079	
Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival.	Factor A	WHY? IS MY QUESTION! Why in the world would you try to eradicate the Grizzly Bear population again? It is so unfortunate that Fish and Wildlife service doesn't seem to exist to protect the wildlife but to destroy it. You always come up with phony reasons to open fire on anything that moves. I get the feeling that you are a bunch of hunters anxious to pull the trigger legally. Just to refresh your memory: The grizzly bear once roamed free throughout the Western states, including 52 of California's 58 counties. Abundant in the Central Valley and North Bay in the 1800s, California grizzlies were also seen feasting on decaying whale carcasses along the shores of Monterey Bay. The last grizzly in California was shot by hunters in the 1920s, although it remains the familiar icon on our state flag. In state after state, ranchers and hunters wiped out local populations, until they were isolated in but a few small ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the greater Yellowstone population was estimated at 300 BEARS. Due to coordinated efforts by federal and state resources agencies mandated by the ESA, cooperative research, monitoring, habitat protections and regulatory mechanisms, including a strict hunting ban, their numbers have grown over the past 30 years to slightly more than 600 BEARS today, according to U.S. Fish and Wildlife's bear recovery coordinator, Chris Servheen. This is a success story that must be acknowledged and celebrated. I do not have to give you the details about why Grizzlies should remain protected, you know them as well as I do. But just in case: While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as a	FWS-R6-ES-2016-0042-5079	

From the Yellowstone Park website: 'Bear mortality rates aren't the only worry for biologists. There's also the issue of genetic isolation among the bears in the Greater Yellowstone. The Yellowstone population has less genetic variation than is found in any other remnant population in North America. Researcher Lance Craighead and others have found that the Yellowstone grizzlies have lost 15-20 percent of their genetic variability over the past century. This could lead to inbreeding and worsen problems stemming from food loss, habitat loss and conflicts with people. Researchers Lisette Waites and Craig Miller have calculated that the Yellowstone population would need 1,850 grizzlies to maintain long-term genetic viability. Importing all those bears from Canada is not an acceptable option. Dr. Michael Gibeau, the foremost bear expert in Alberta, said the province has only 500 bears. "They're skinny and stressed," he said, from rampant energy and economic development and fragmentation of habitat. Gibeau said a female grizzly in Alberta needs 500 square kilometers of habitat, while a male needs 1,500-6,000 square kilometers, due to highly fragmented and lower quality habitats. Tapping Alberta bears to make up for U.S. losses is unrealistic, he said. "Bears are caught in a giant pinball game, bumping against people and mountain peaks," Gibeau said. In his research, he's found a linear relationship between road density and bear mortality: more roads mean more dead bears, because more roads increase opportunities for bears and people to meet.	Factor A	From the Yellowstone Park website: 'Bear mortality rates aren't the only worry for biologists. There's also the issue of genetic isolation among the bears in the Greater Yellowstone. The Yellowstone population has less genetic variation than is found in any other remnant population in North America. Researcher Lance Craighead and others have found that the Yellowstone grizzlies have lost 15-20 percent of their genetic variability over the past century. This could lead to inbreeding and worsen problems stemming from food loss, habitat loss and conflicts with people. Researchers Lisette Waites and Craig Miller have calculated that the Yellowstone population would need 1,850 grizzlies to maintain long-term genetic viability. Importing all those bears from Canada is not an acceptable option. Dr. Michael Gibeau, the foremost bear expert in Alberta, said the province has only 500 bears. "They're skinny and stressed," he said, from rampant energy and economic development and fragmentation of habitat. Gibeau said a female grizzly in Alberta needs 500 square kilometers of habitat, while a male needs 1,500-6,000 square kilometers, due to highly fragmented and lower quality habitats. Tapping Alberta bears to make up for U.S. losses is unrealistic, he said. "Bears are caught in a giant pinball game, bumping against people and mountain peaks," Gibeau said. In his research, he's found a linear relationship between road density and bear mortality: more roads mean more dead bears, because more roads increase opportunities for bears and people to meet. Yet Servheen maintains that bear numbers in the Greater Yellowstone ecosystem will be closely monitored. If numbers should fall to 500, he told the Los Angeles Times earlier this year, that would trigger a management review, and a review could lead to an emergency relisting of grizzlies under the Endangered Species Act. "That's very discretionary and very fuzzy," countered Willcox. "There are no hard triggers anywhere in the state or federal plans," she said - no single, lower population number for grizzlies that would trigger an automatic relisting under the Endangered Species Act. Willcox's fear is that without a hard trigger, the states and U.S. Fish & Wildlife will use adaptive management to ineffectively tweak this or that aspect of this or that state plan, while habitat continues to be lost to development, foods continue to decline and bears continue to die. And, Willcox noted, the Bush administration has not voluntarily listed a single species in over four years - despite a backlog of thousands of species in danger of extinction. The political opposition to relisting grizzlies would be tremendous. Relisting might never occur, said Willcox, or come too late to do any good.' Please, do not delist these bears.	FWS-R6-ES-2016-0042-5147	
The conservation efforts that have been deployed to encourage the Grizzly Bears recovery have been a great success. However, these efforts should be continued until Grizzly populations are connected over the entire landscape between Yellowstone and the Yukon. Isolated populations do not do well over the long run. Grizzly Bears need to be allowed to roam freely through all areas with suitable habitat. The Yellowstone grizzly bear population is an isolated population. There is very little evidence that Grizzly Bears from Yellowstone travel to other Grizzly Bear populations to the north.	Factor A	To the U.S. Fish and Wildlife Service: I am writing for the board of directors of the North Fork Preservation Association to comment on the proposal to remove Grizzly Bears in the Greater Yellowstone Ecosystem from the Federal List of endangered and threatened wildlife. Our community on the North Fork of the Flathead River in Northwest Montana, sitting just below the U.S./Canadian border next to Glacier National Park is one of the most ecologically diverse regions in North America. We also have the highest population of Grizzly Bears in the lower 48 states. Surrounded by public land and wildlife habitat, we have learned to live peacefully in the Grizzlies country. We value these bears and have enjoyed watching their numbers grow over the last few decades. The conservation efforts that have been deployed to encourage the Grizzly Bears recovery have been a great success. However, these efforts should be continued until Grizzly populations are connected over the entire landscape between Yellowstone and the Yukon. Isolated populations do not do well over the long run. Grizzly Bears need to be allowed to roam freely through all areas with suitable habitat. The Yellowstone grizzly bear population is an isolated population. There is very little evidence that Grizzly Bears from Yellowstone travel to other Grizzly Bear populations to the north. Without this connectivity, genetic diversity cannot remain strong in the Yellowstone population. For this reason, we feel that it is too early to delist Grizzly Bears. We also disagree with trophy hunting grizzly bears. It has taken many decades and millions of our tax dollars to change the trend toward extinction and hunting these iconic creatures seems contrary to everything that we have achieved. In addition, the status of Grizzly Bears in the public mind has risen. Many visitors come to Montana and Wyoming hoping to see a Grizzly Bear. These bears are the heritage of all of the people in the U.S., not just those of us who live in Montana, Wyoming, or Idaho. Just from an economic viewpoint these Bears generate more income for Montana, Wyoming, and Idaho from visitors than will ever be realized from 10-50 annual Trophy Tags. There are many more people who want to see a grizzly bear than shoot one. There also needs to be adequate and continual funding for Bear conservation in place, including bear management personnel to deal with bear-people conflicts, before delisting happens. The loss of federal money for conservation efforts is a major concern regarding delisting. For these reasons, we oppose the delisting of Grizzly Bears at this time.	FWS-R6-ES-2016-0042-5128	

Without this connectivity, genetic diversity cannot remain strong in the Yellowstone population. For this reason, we feel that it is too early to delist Grizzly Bears.	Factor A	To the U.S. Fish and Wildlife Service: I am writing for the board of directors of the North Fork Preservation Association to comment on the proposal to remove Grizzly Bears in the Greater Yellowstone Ecosystem from the Federal List of endangered and threatened wildlife. Our community on the North Fork of the Flathead River in Northwest Montana, sitting just below the U.S./Canadian border next to Glacier National Park is one of the most ecologically diverse regions in North America. We also have the highest population of Grizzly Bears in the lower 48 states. Surrounded by public land and wildlife habitat, we have learned to live peacefully in the Grizzlies country. We value these bears and have enjoyed watching their numbers grow over the last few decades. The conservation efforts that have been deployed to encourage the Grizzly Bears recovery have been a great success. However, these efforts should be continued until Grizzly populations are connected over the entire landscape between Yellowstone and the Yukon. Isolated populations do not do well over the long run. Grizzly Bears need to be allowed to roam freely through all areas with suitable habitat. The Yellowstone grizzly bear population is an isolated population. There is very little evidence that Grizzly Bears from Yellowstone travel to other Grizzly Bear populations to the north. Without this connectivity, genetic diversity cannot remain strong in the Yellowstone population. For this reason, we feel that it is too early to delist Grizzly Bears. We also disagree with trophy hunting grizzly bears. It has taken many decades and millions of our tax dollars to change the trend toward extinction and hunting these iconic creatures seems contrary to everything that we have achieved. In addition, the status of Grizzly Bears in the public mind has risen. Many visitors come to Montana and Wyoming hoping to see a Grizzly Bear. These bears are the heritage of all of the people in the U.S., not just those of us who live in Montana, Wyoming, or Idaho. Just from an economic viewpoint these Bears generate more income for Montana, Wyoming, and Idaho from visitors than will ever be realized from 10-50 annual Trophy Tags. There are many more people who want to see a grizzly bear than shoot one. There also needs to be adequate and continual funding for Bear conservation in place, including bear management personnel to deal with bear-people conflicts, before delisting happens. The loss of federal money for conservation efforts is a major concern regarding delisting. For these reasons, we oppose the delisting of Grizzly Bears at this time.	FWS-R6-ES-2016-0042-5128	
1) Quantity/quality of habitat. Climate change and development pressure continue to impact grizzly bear food sources and habitat. Traditional food sources (whitebark pine, cutworm moths, cutthroat trout) are threatened by climate change and invasive species. Development continues to fragment the edges and connectivity of core grizzly bear range. Management needs to aggressively protect habitat including limiting development and road densities in core areas. USFWS needs to work with states and other land management agencies to ensure long-term habitat protection.	Factor A	I am writing to say I do not support the USFWS plan to delist the grizzly bear. Grizzly bear recovery has been a slowly successful, long-term process for the Interagency Grizzly Bear Study Team; they should be proud of their efforts. But I don't believe there is scientific consensus that the species is beyond the need for protection. And I don't believe there is agreement among all interests that the grizzly population is stable enough to withstand hunting. The USFWS states in a their press release from March 3, 2016 that delisting does not solely rely on numbers but also includes "the quantity and quality of habitat, adequate regulatory mechanisms to maintain a healthy and viable population, and a good balance of male and female bears that are well-distributed throughout the ecosystem." I believe all of these factors are unresolved and continue to place the grizzly bear at risk. 1) Quantity/quality of habitat. Climate change and development pressure continue to impact grizzly bear food sources and habitat. Traditional food sources (whitebark pine, cutworm moths, cutthroat trout) are threatened by climate change and invasive species. Development continues to fragment the edges and connectivity of core grizzly bear range. Management needs to aggressively protect habitat including limiting development and road densities in core areas. USFWS needs to work with states and other land management agencies to ensure long-term habitat protection. 2) Regulatory mechanisms. There are not adequate regulatory mechanisms in place to guarantee grizzly populations are maintained, especially if hunting is allowed. USFWS and states need to set strict caps on grizzly mortality and ensure mechanisms and funding are in place to reduce human-bear conflict. 3) Bear distribution. Scientists and concerned citizens have always maintained that in order to ensure a strong and stable population there must be a genetic connectivity to other grizzly populations in the Northern Rockies. I am concerned that pressure from hunting and other human-bear conflict will continue to isolate the Greater Yellowstone population. On an emotional and intellectual level I just don't believe an iconic animal such as the grizzly bear should be hunted. If they were restored to their historic range and allowed to roam the Rocky Mountains, the Great Plains and the Central Valley I might feel differently, but that is never going to happen. I think there is too much risk of increased mortality to bears if a spring and fall hunting season is opened. Finally, I don't think delisting is an appropriate tool of adaptive management when applied to conservation biology. I'm not sure it works well within the regulatory framework of the Endangered Species Act. It is too coarse, too slow, and does not allow for versatile adaptability. I think it will be much more challenging to relist the grizzly than it is to delist (which is proving challenging enough). The numbers might look good at this moment in time but I'm worried about the long-term trend, with unresolved pressure from climate change and habitat fragmentation, on the stability of the grizzly bear.	FWS-R6-ES-2016-0042-5158	

The E.S.A. does not envision the restoration of endangered and threatened species to geographical "zoos", especially with such historically wide ranging species as the grizzly. It envisions restoration of species to their historic habitat, NOT CURRENTLY OCCUPIED HABITAT. Grizzlies didn't evolve in geographic zoos and until their extermination began in the 17th century, they were spread all over the West. That means that their genetic diversity and long term survival depended upon, and depends upon now, adaptations to different environments and interchange with other populations throughout the West. The intent of the E.S.A. is to replicate, as much as possible, these evolved natural conditions of the species. In other words, we're talking about a species that has an evolutionary biology and ecology that depends upon its being in lots of places at low densities rather than having large populations in a few places which would create serious biological and ecological problems. Grizzlies, being at the top of the food chain, are necessarily limited in number in specific areas by food availability. In short, that means what is natural for grizzlies is low densities in specific areas but widespread distribution of interconnected populations throughout the continent....this is how genetic diversity is maintained.....You maintain genetic diversity by having small stable populations spread widely across the landscape with dispersers moving among populations. It's about density and distribution and interconnectedness, not numbers of bears. I urge you to allow grizzlies to seek out new areas so that the connectedness will continue to spread. This WILL NOT be achieved under state management and under hunting pressure.	Factor A	I wish for the record to show that I am AGAINST the delisting of grizzlies in the Greater Yellowstone Ecosystem. The extirpation of grizzlies and other large carnivores from an ecosystem is a global phenomenon with broad ecological consequences. Grizzlies and other carnivores benefit and shape our North American ecosystems. The Endangered Species Act calls for restoration of threatened and endangered species to a SIGNIFICANT portion of their HISTORIC range, The word "historic" doesn't appear in the law, but "historic" is logically and scientifically inseparable from "significant". When USFWS wrote its first implementing regulation for the E.S.A., it interpreted the law and congressional intent to require restoration to historic ranges. This interpretation remained in place for over thirty years until the Bush Administration ILLEGALLY tried to reinterpret "range" to mean only "currently occupied" range to limit the biologically necessary but politically volatile expansion of such species as the wolf and grizzly bear. This latter day interpretation violates the restorative intent of the E.S.A. and the biological and ecological needs of the previously wide ranging species such as the Grizzly Bear. The E.S.A. does not envision the restoration of endangered and threatened species to geographical "zoos", especially with such historically wide ranging species as the grizzly. It envisions restoration of species to their historic habitat, NOT CURRENTLY OCCUPIED HABITAT. Grizzlies didn't evolve in geographic zoos and until their extermination began in the 17th century, they were spread all over the West. That means that their genetic diversity and long term survival depended upon, and depends upon now, adaptations to different environments and interchange with other populations throughout the West. The intent of the E.S.A. is to replicate, as much as possible, these evolved natural conditions of the species. In other words, we're talking about a species that has an evolutionary biology and ecology that depends upon its being in lots of places at low densities rather than having large populations in a few places which would create serious biological and ecological problems. Grizzlies, being at the top of the food chain, are necessarily limited in number in specific areas by food availability. In short, that means what is natural for grizzlies is low densities in specific areas but widespread distribution of interconnected populations throughout the continent....this is how genetic diversity is maintained.....You maintain genetic diversity by having small stable populations spread widely across the landscape with dispersers moving among populations. It's about density and distribution and interconnectedness, not numbers of bears. I urge you to allow grizzlies to seek out new areas so that the connectedness will continue to spread. This WILL NOT be achieved under state management and under hunting pressure. In summary...the E.S.A. requires grizzly restoration to the species historic range. I ask you to take this into consideration and allow this dispersal to move forward without taking away the protections these bears need. If left to state management, this will not happen and once again grizzlies will persecuted and annihilated from our lands.	FWS-R6-ES-2016-0042-5190	
Grizzly mortality is also increasing. Even if there were an accurate count of grizzlies in the ecosystem, this should be cause for concern. Their range is also merely a fraction of what it was historically-somewhere around 4%. Is that really enough range to be considered recovered to a point where delisting can be an option?	Factor A	I do not support removing the GYE grizzly bear population protections. As a guide and educator in the Greater Yellowstone Ecosystem, I believe that there are some flaws with this proposal. First of all, two main food sources of Yellowstone grizzlies- Whitebark Pine Nuts and Cutthroat Trout- are not stable, and it is unclear what effect their further decline will have on grizzlies who rely heavily on them for food. The Center for Biological Diversity recognizes the threat of climate change on these food sources and therefore on the grizzly. Grizzly mortality is also increasing. Even if there were an accurate count of grizzlies in the ecosystem, this should be cause for concern. Their range is also merely a fraction of what it was historically-somewhere around 4%. Is that really enough range to be considered recovered to a point where delisting can be an option? Also, many Native American tribes oppose the delisting of the grizzly, and I stand by their opposition as the grizzly is culturally and environmentally important to them. Having seen the treatment of wolves in the states of Montana, Idaho, and Wyoming following their delisting, I have little confidence in the ability of the states to manage another large predator with trophy hunts. Wyoming had its control of wolves revoked; and I do not believe they will do any better with their control of grizzlies. The grizzly bear is still a recovering, threatened animal in the Greater Yellowstone Ecosystem.	FWS-R6-ES-2016-0042-5204	

We are going to see a decrease in bears WITHOUT hunting, due to development and an increase in the human population in the Greater Yellowstone Ecosystem (GYE), especially after delisting when so much of their habitat will be opened to fracking, natural gas development, mining and trophy homes. By the time we need to re-list, which will most certainly happen due to a variety of reasons below, we will have lost critical habitat and many other species under the grizzly umbrella.	Factor A	I have spend a significant amount of time in Yellowstone from 1995 to present. I have a deep love for the Greater Yellowstone Ecosystem and want my children to be able to grow up and see this land as I have come to know it -- a large are a of relatively undisturbed habitat. Removing Grizzly Bears will drastically change the dynamics of the ecosystem. We are going to see a decrease in bears WITHOUT hunting, due to development and an increase in the human population in the Greater Yellowstone Ecosystem (GYE), especially after delisting when so much of their habitat will be opened to fracking, natural gas development, mining and trophy homes. By the time we need to re-list, which will most certainly happen due to a variety of reasons below, we will have lost critical habitat and many other species under the grizzly umbrella. Having lived in the GYE for the past 20 years, learning and teaching about this ecosystem, I promise you, this will have major effects. The number one threat to the GYE is climate change. We are currently experiencing an extinction rate 1000x greater than anything on the paleontological record, and it is our fault. Water availability affecting flora and fauna, foods for grizzlies, will be affected. Plants will be migrating up, or north and bears may not be able to follow them. A precarious population with an extremely low growth rate will not fare well under any circumstances, let alone one without utmost protection. Their threatened critical food sources (trout, whitebark pines) that are supposedly being replaced with other sources do not take into account the difference in caloric value, quality of food, seasonal needs, and availability without human interference. There are temporal, spatial, caloric and risk factors that aren't being addressed in the proposal. The "adaptable bear" argument is moot. US FWS must submit their population data for proper peer review (the Interagency Grizzly Bear Study Team doesn't count.) There may well be 700 bears, but it is suspect that the number nearly doubled in 2007 when delisting was on the table. It is suspect that for many yrs the population was 260-600, then all of a sudden it was a solid 700. The methods involve a lot of extrapolation from very few verifiable sightings and that should make us nervous. An independent, unbiased, qualified source can be trusted with the geographic data the IGBST is reticent to release. The fact that the Northern Continental Divide Ecosystem bears are not on the chopping block is odd. There are more bears in that population, yet ours are threatened with less protection. The incredible pressure on this land for development of second (and third) homes, fracking, mining and general development is astonishing, and powerful enough to convince public officials we should throw caution to the wind and see how it goes. There was a 6% decrease in the past 2 years and at least 59 known dead last year (likely higher). This is a trend for the past few years. Actual numbers will rise and fall, but there is not an overall growth trend. Grizzly protection also shelters my sanity. To live and hike in griz country moves me to an equilibrium that's hard to find in an ever more deafening society, and it is irreplaceable. Being face to face with a grizzly leaves with my cells on fire, and a passion for life you cannot buy. Having a daughter later in life is directly tied to me raising her in a place where wilderness reigns.	FWS-R6-ES-2016-0042-5209	
The fact that the Northern Continental Divide Ecosystem bears are not on the chopping block is odd. There are more bears in that population, yet ours are threatened with less protection. The incredible pressure on this land for development of second (and third) homes, fracking, mining and general development is astonishing, and powerful enough to convince public officials we should throw caution to the wind and see how it goes. There was a 6% decrease in the past 2 years and at least 59 known dead last year (likely higher). This is a trend for the past few years. Actual numbers will rise and fall, but there is not an overall growth trend.	Factor A	I have spend a significant amount of time in Yellowstone from 1995 to present. I have a deep love for the Greater Yellowstone Ecosystem and want my children to be able to grow up and see this land as I have come to know it -- a large are a of relatively undisturbed habitat. Removing Grizzly Bears will drastically change the dynamics of the ecosystem. We are going to see a decrease in bears WITHOUT hunting, due to development and an increase in the human population in the Greater Yellowstone Ecosystem (GYE), especially after delisting when so much of their habitat will be opened to fracking, natural gas development, mining and trophy homes. By the time we need to re-list, which will most certainly happen due to a variety of reasons below, we will have lost critical habitat and many other species under the grizzly umbrella. Having lived in the GYE for the past 20 years, learning and teaching about this ecosystem, I promise you, this will have major effects. The number one threat to the GYE is climate change. We are currently experiencing an extinction rate 1000x greater than anything on the paleontological record, and it is our fault. Water availability affecting flora and fauna, foods for grizzlies, will be affected. Plants will be migrating up, or north and bears may not be able to follow them. A precarious population with an extremely low growth rate will not fare well under any circumstances, let alone one without utmost protection. Their threatened critical food sources (trout, whitebark pines) that are supposedly being replaced with other sources do not take into account the difference in caloric value, quality of food, seasonal needs, and availability without human interference. There are temporal, spatial, caloric and risk factors that aren't being addressed in the proposal. The "adaptable bear" argument is moot. US FWS must submit their population data for proper peer review (the Interagency Grizzly Bear Study Team doesn't count.) There may well be 700 bears, but it is suspect that the number nearly doubled in 2007 when delisting was on the table. It is suspect that for many yrs the population was 260-600, then all of a sudden it was a solid 700. The methods involve a lot of extrapolation from very few verifiable sightings and that should make us nervous. An independent, unbiased, qualified source can be trusted with the geographic data the IGBST is reticent to release. The fact that the Northern Continental Divide Ecosystem bears are not on the chopping block is odd. There are more bears in that population, yet ours are threatened with less protection. The incredible pressure on this land for development of second (and third) homes, fracking, mining and general development is astonishing, and powerful enough to convince public officials we should throw caution to the wind and see how it goes. There was a 6% decrease in the past 2 years and at least 59 known dead last year (likely higher). This is a trend for the past few years. Actual numbers will rise and fall, but there is not an overall growth trend. Grizzly protection also shelters my sanity. To live and hike in griz country moves me to an equilibrium that's hard to find in an ever more deafening society, and it is irreplaceable. Being face to face with a grizzly leaves with my cells on fire, and a passion for life you cannot buy. Having a daughter later in life is directly tied to me raising her in a place where wilderness reigns.	FWS-R6-ES-2016-0042-5209	

The Primary Conservation Area... (PCA) does not include all of Grand Teton National Park and areas of the Northern Wind Rivers and Upper Green River where grizzlies have long been established. The PCA should be expanded and updated to include these and all areas where grizzlies are currently found.	Factor A	1) The Primary Conservation Area... (PCA) does not include all of Grand Teton National Park and areas of the Northern Wind Rivers and Upper Green River where grizzlies have long been established. The PCA should be expanded and updated to include these and all areas where grizzlies are currently found. 2) Areas outside the PCA are referred to the Demographic Management Area (DMA). The DMA will be mostly managed by state agencies. Fortunately a good chunk of grizzly habitat falls within tribal lands (in WY) not subject to heavy handed state mismanagement of predators. 3) The entirety of the Wyoming Range, Caribou Range (Idaho), and the Targhee National Forest west of Jackson, WY should be included in the DMA. Grizzly populations currently in the Wyoming Range and other areas that fall outside of the DMA, are subject to extreme management actions and killing by hunters. No incentive to protect bears in suitable habitat outside the DMA. 4) Grizzlies located outside the PCA will be "allowed to expand into biologically suitable and socially acceptable areas". How does a state, hostile to predators, identify what is socially acceptable. A blank check for heavy handed management. Again, areas in the Upper Green, around Teton Park, and the northern Wind River Range with established grizzly populations most likely will see dramatic decreases in numbers. 5) Maintain only 500 grizzlies in the Greater Yellowstone Ecosystem (GYE). With estimates over 700, there is no motivation for the states to maintain grizzly numbers. 6) There is already a lot of human caused mortality outside the PCA, especially in the Upper Green River and Wind River areas. This probably will become worse since the State will have primary management control in these areas. 7) There are still healthy stands of Whitebark Pine outside the PCA in the Northern and Southern Wind Rivers, vital food for grizzlies. These areas will be primarily managed by the states. 8) The Wyoming management of grizzlies in the DMA as stated in their management plan, "significant consideration will be given to humans". We can only assume grizzlies will pay with their lives more often at the hands of state employees. Socially Accepted = Intolerance. 9) Wyoming Plan and handling of nuisance bears; "Grizzlies displaying natural aggression may be removed from the population." Natural aggression is defined as a grizzly defending itself, cubs, or food source. In the DMA, seems like grizzlies will be killed when they simply defend themselves by our intrusions. 10) A grizzly getting into chicken coups (without electric fences or other means to try and deter grizzlies) most likely will be killed by game managers, especially in the DMA. This is an alarming trend in grizzly country with the rise of people wanting to raise their own chickens. Outside of cattle and sheep, chickens are resulting in dead grizzlies. 11) The concern over sport hunting is real. There should be a moratorium on any sport hunting for 10 years to ensure the State is doing all it can to preserve grizzlies. 12) I DO NOT support delisting grizzlies in the Greater Yellowstone Area. It ensures the population will remain an isolated population. Historically hostile views of western states towards predators is proof enough that grizzlies should not be delisted. Wyoming has yet to turn in an acceptable wolf plan. How can it be expected to manage the vast majority of grizzlies within the GYE.	FWS-R6-ES-2016-0042-0533	
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There is scientific uncertainty around the effects of climate change on grizzly bears and their food sources. Connectivity remains a major problem; Yellowstone's grizzlies are isolated from their kin in Glacier, a few hundred miles to the north. Moreover, it is likely the GYE population is no longer growing and most likely declining. The GYE population, along with grizzlies to the north, only represent a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the contiguous U.S. In a range that was formerly 100 times larger	Factor A	See Attached Attachments Sheehy Pike Lisa	FWS-R6-ES-2016-0042-0522	Connectivity
There are still healthy stands of Whitebark Pine outside the PCA in the Northern and Southern Wind Rivers, vital food for grizzlies. These areas will be primarily managed by the states.	Factor A	1) The Primary Conservation Area... (PCA) does not include all of Grand Teton National Park and areas of the Northern Wind Rivers and Upper Green River where grizzlies have long been established. The PCA should be expanded and updated to include these and all areas where grizzlies are currently found. 2) Areas outside the PCA are referred to the Demographic Management Area (DMA). The DMA will be mostly managed by state agencies. Fortunately a good chunk of grizzly habitat falls within tribal lands (in WY) not subject to heavy handed state mismanagement of predators. 3) The entirety of the Wyoming Range, Caribou Range (Idaho), and the Targhee National Forest west of Jackson, WY should be included in the DMA. Grizzly populations currently in the Wyoming Range and other areas that fall outside of the DMA, are subject to extreme management actions and killing by hunters. No incentive to protect bears in suitable habitat outside the DMA. 4) Grizzlies located outside the PCA will be "allowed to expand into biologically suitable and socially acceptable areas". How does a state, hostile to predators, identify what is socially acceptable. A blank check for heavy handed management. Again, areas in the Upper Green, around Teton Park, and the northern Wind River Range with established grizzly populations most likely will see dramatic decreases in numbers. 5) Maintain only 500 grizzlies in the Greater Yellowstone Ecosystem (GYE). With estimates over 700, there is no motivation for the states to maintain grizzly numbers. 6) There is already a lot of human caused mortality outside the PCA, especially in the Upper Green River and Wind River areas. This probably will become worse since the State will have primary management control in these areas. 7) There are still healthy stands of Whitebark Pine outside the PCA in the Northern and Southern Wind Rivers, vital food for grizzlies. These areas will be primarily managed by the states. 8) The Wyoming management of grizzlies in the DMA as stated in their management plan, "significant consideration will be given to humans". We can only assume grizzlies will pay with their lives more often at the hands of state employees. Socially Accepted = Intolerance. 9) Wyoming Plan and handling of nuisance bears; "Grizzlies displaying natural aggression may be removed from the population." Natural aggression is defined as a grizzly defending itself, cubs, or food source. In the DMA, seems like grizzlies will be killed when they simply defend themselves by our intrusions. 10) A grizzly getting into chicken coups (without electric fences or other means to try and deter grizzlies) most likely will be killed by game managers, especially in the DMA. This is an alarming trend in grizzly country with the rise of people wanting to raise their own chickens. Outside of cattle and sheep, chickens are resulting in dead grizzlies. 11) The concern over sport hunting is real. There should be a moratorium on any sport hunting for 10 years to ensure the State is doing all it can to preserve grizzlies. 12) I DO NOT support delisting grizzlies in the Greater Yellowstone Area. It ensures the population will remain an isolated population. Historically hostile views of western states towards predators is proof enough that grizzlies should not be delisted. Wyoming has yet to turn in an acceptable wolf plan. How can it be expected to manage the vast majority of grizzlies within the GYE.	FWS-R6-ES-2016-0042-0533	

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As to habitat, the PCA does its job of being a fertile core refuge for the bear and the DMA, with enlightened management, will do its job as long as we place the ecosystem's health first, like continued road density metrics and limiting consumptive activities. We know the critical issues and after four decades the data is there to guide us.	Factor A	See attached file(s) Attachments Delisting Grizzly Comments 4-12-16	FWS-R6-ES-2016-0042-0673	
3--Shrinking habitat, that is even now far too limited.	Factor A	As a lifelong resident of the Greater Yellowstone Ecosystem, and one who has worked directly with the Inter Agency Recovery Team over a span of many years, I strongly oppose the delisting the the Grizzly bear. I join those who are concerned about: 1--The voracious desire, most notably by surrounding states of Wyoming and Montana, to capitalize financially on trophy hunting. 2--The under-studied repercussions of climate change and the impact on the bear's food supply. 3--Shrinking habitat, that is even now far too limited. 4--The unreasonable reliance of FWS on unreliable bear numbers. 5--The absence of corridors to permit grizzly migration. 6--The inability to forecast human caused bear mortality, that is only going to increase with development and population growth. The Yellowstone Grizzly is a national treasure. Removal from endangered/threatened status is trading that treasure for fool's gold. While it may be provide a boastful feather in the cap for FWS, it will prove to be one of the most ill-conceived proposals ever advanced by FWS.	FWS-R6-ES-2016-0042-0672	
5--The absence of corridors to permit grizzly migration.	Factor A	As a lifelong resident of the Greater Yellowstone Ecosystem, and one who has worked directly with the Inter Agency Recovery Team over a span of many years, I strongly oppose the delisting the the Grizzly bear. I join those who are concerned about: 1--The voracious desire, most notably by surrounding states of Wyoming and Montana, to capitalize financially on trophy hunting. 2--The under-studied repercussions of climate change and the impact on the bear's food supply. 3--Shrinking habitat, that is even now far too limited. 4--The unreasonable reliance of FWS on unreliable bear numbers. 5--The absence of corridors to permit grizzly migration. 6--The inability to forecast human caused bear mortality, that is only going to increase with development and population growth. The Yellowstone Grizzly is a national treasure. Removal from endangered/threatened status is trading that treasure for fool's gold. While it may be provide a boastful feather in the cap for FWS, it will prove to be one of the most ill-conceived proposals ever advanced by FWS.	FWS-R6-ES-2016-0042-0672	

I'm a biologist. What I got out of reading this document is that the USFWS wants to use its failure to recover the Greater Yellowstone Grizzly Bear population to the point where it can properly interact with other grizzly bear populations as an excuse to consider this population in isolation from the rest of the species. I see a population of 500 stated as sufficient to maintain genetic diversity, when what I was taught in school is that anything below 1,000 is at serious genetic risk, and that healthy populations need to be at 10,000 individuals or greater. I see mentions of acceptable mortality which I interpret as giving the go-ahead to hunting. No surprise there, as wildlife agencies at both state and federal level are incredibly spineless about protecting wildlife unless it can be a source of fee revenue. I totally OPPOSE the de-listing, under any of the alternatives. What the USFWS should be doing is working with adjacent public land agencies to remove the land use barriers such as sheep allotments and associated high-danger strips that mean that large amounts of otherwise suitable habitat for grizzlies is classified as uninhabitable.	Factor A	I'm a biologist. What I got out of reading this document is that the USFWS wants to use its failure to recover the Greater Yellowstone Grizzly Bear population to the point where it can properly interact with other grizzly bear populations as an excuse to consider this population in isolation from the rest of the species. I see a population of 500 stated as sufficient to maintain genetic diversity, when what I was taught in school is that anything below 1,000 is at serious genetic risk, and that healthy populations need to be at 10,000 individuals or greater. I see mentions of acceptable mortality which I interpret as giving the go-ahead to hunting. No surprise there, as wildlife agencies at both state and federal level are incredibly spineless about protecting wildlife unless it can be a source of fee revenue. I totally OPPOSE the de-listing, under any of the alternatives. What the USFWS should be doing is working with adjacent public land agencies to remove the land use barriers such as sheep allotments and associated high-danger strips that mean that large amounts of otherwise suitable habitat for grizzlies is classified as uninhabitable.	FWS-R6-ES-2016-0042-0709	
Only the smallest core habitat is in a protected area, the park. The increasing pressure on the remaining wild ecosystem by development on the periphery of the park and elsewhere in the region is not conducive to complacency about the ability of the population to continue to do well, even under the existing protections.	Factor A	I strongly oppose the delisting of the Yellowstone ecosystem grizzly population, for the following reasons: 1. Only the smallest core habitat is in a protected area, the park. The increasing pressure on the remaining wild ecosystem by development on the periphery of the park and elsewhere in the region is not conducive to complacency about the ability of the population to continue to do well, even under the existing protections. 2. The habitat is still marginal for food sources, and the climate crisis is only going to make the situation worse. 3. Idaho and Wyoming are insane as far as wildlife protection, especially predator protection, is concerned. I wouldn't trust them for a minute with the management of an animal as irrationally hated in those states as the grizzly. Please withdraw this proposed regulation and continue to manage grizzly populations as they are managed today.	FWS-R6-ES-2016-0042-0743	
The habitat is still marginal for food sources, and the climate crisis is only going to make the situation worse.	Factor A	I strongly oppose the delisting of the Yellowstone ecosystem grizzly population, for the following reasons: 1. Only the smallest core habitat is in a protected area, the park. The increasing pressure on the remaining wild ecosystem by development on the periphery of the park and elsewhere in the region is not conducive to complacency about the ability of the population to continue to do well, even under the existing protections. 2. The habitat is still marginal for food sources, and the climate crisis is only going to make the situation worse. 3. Idaho and Wyoming are insane as far as wildlife protection, especially predator protection, is concerned. I wouldn't trust them for a minute with the management of an animal as irrationally hated in those states as the grizzly. Please withdraw this proposed regulation and continue to manage grizzly populations as they are managed today.	FWS-R6-ES-2016-0042-0743	
5) There is no protected natural connectivity to the Selway Bitterroot area in Idaho	Factor A	I am against the removal of the Greater Yellowstone Grizzly Bear Population from the Federal List of Endangered and Threatened Species for the following reasons: 1) Climate Change is impacting the ecosystem - reducing white-bark pine nuts available to grizzlies. 2) Climate Change is impacting and altering the ecosystem in ways that we do not foresee. 3) Human population growth and urban development infringes on habitat and connectivity between populations. 4) Disease can spread through a small population and reduce the population significantly and/or cause extinction - such as has occurred with Tasmanian Devil (Devil facial tumor disease). 5) There is no protected natural connectivity to the Selway Bitterroot area in Idaho. 6) There is no nearby grizzly population in the Selway Bitterroot area in Idaho. 6) Delisting will allow trophy hunting of the grizzly bear - which is a thoroughly disgusting and self centered pastime.	FWS-R6-ES-2016-0042-0727	

The areas which border the GYE is becoming more heavily populated. With the encroachment of development the bears have very little space in which to travel from one population to another for breeding. If there are no safe guards for the bears to migrate to other areas the population will be trapped, this again brings them to the point of being endangered.	Factor A	I strongly OPPOSE the delisting of the GYE grizzlies. The grizzly is facing losses of some of their key food sources such as the white bark pine. This has been studied and the concerns of loss of these foods has been supported by the Ninth Circuit Court of Appeals, Federal District Judge Molloy. The cutthroat trout are also diminishing due to the introduction of non native species causing 2 of the grizzlies main food sources to scarce. With these food supplies short they must look elsewhere for new foods to replace these. With no protections outside the park they will not have the habitat needed to establish new food sources. The lack of food sources is what cause the very few and far between encounters with ranchers livestock. The adjoining states have already said and have it in their plans to allow killing of any grizzlies who pose a threat to their livestock. The reproduction rate of the grizzly is slow and without the necessary food sources to make it through hibernation there will be fewer births. If you consider this in conjunction with the amount of bears each state is going to allowed to be hunted, the number of bears that will inevitably be killed because due to ranchers seeing them as a threat to their livestock, the current population of bears will not stand the reduction without grave consequences. The citizens of the united states have paid for the protection of these bears. Your office has been charged with the duty of safe guarding these bears and delisting them without more thought and planning for the delisting will certainly put them back in an endangered state. The areas which border the GYE is becoming more heavily populated. With the encroachment of development the bears have very little space in which to travel from one population to another for breeding. If there are no safe guards for the bears to migrate to other areas the population will be trapped, this again brings them to the point of being endangered. There is no reason for hunting a bear other than sport and the money the states have proposed to charge for the hunting of this prized animal will in no way cover the cost the tax payers have already paid to protect that bear. It just doesn;t make sense. The ranches are compensated by the numerous willing organizations for the loss of any animal killed by a bear. So it is not like the grizzlies are out there destroying herds of cattle. In fact as per your own studies the losses of ranchers has been minimal, and the ranchers do not loss money. At the very least the Primary Conservation area should be increased to include bear corridors, and am ample area around the entire GYE for the bears. Encounters with bears for people are rare, and most of those have proven it was not the bears fault, but the people's; regardless those bears have been killed. If people are going to go into bear country and not be prepared it is their fault and the entire population of bears should not have to pay the price for human stupidity. If you allow the states to openly place and advertise these great bears can be shot for a trophy what are you saying about your plan and your entrusted duty to safe guard the animals of our great parks and country. The states of Wyoming and Idaho allow for baiting of bears. They are saying it will not be allowed for the grizzly but it is not in their plan and when someone baits a black bear and a grizzly shows up that someone will shoot it and claim they thought it was a black bear. The current grizzly population cannot withstand these additional killings. The grizzly was placed on the endangered species list and should remain so. There is no unified plan that	FWS-R6-ES-2016-0042-0739	
The likelihood for corridors to link the GYA bears with bears in other ecosystems is remote and willcontinue to decline.	Factor A	I oppose delisting of the grizzly bear in the GYA, as I anticipate the bear would suffer immediate setbacks. As the human population is only increasing and will continue to increase into the future, the loss of habitat coupled with increased human conflicts and associated mortalities will only increase. The population is minimal at present, particularly when considering genetics and females. The likelihood for corridors to link the GYA bears with bears in other ecosystems is remote and will continue to decline. Increased mortalities will normally result in a greater number of lost females that would no longer contribute offspring. Any of the scientists involved with the IGBST know there is uncertainty in the outcome of delisting the grizzly bear. Why take the chance of screwing something up that has taken so long to establish? I urge USFWS to withdraw from their continued efforts to delist the grizzly bear.	FWS-R6-ES-2016-0042-0744	

At the very least the Primary Conservation area should be increased to include bear corridors, and am ample area around the entire GYE for the bears.	Factor A	I strongly OPPOSE the delisting of the GYE grizzlies. The grizzly is facing losses of some of their key food sources such as the white bark pine. This has been studied and the concerns of loss of these foods has been supported by the Ninth Circuit Court of Appeals, Federal District Judge Molloy. The cutthroat trout are also diminishing due to the introduction of non native species causing 2 of the grizzlies main food sources to scarce. With these food supplies short they must look elsewhere for new foods to replace these. With no protections outside the park they will not have the habitat needed to establish new food sources. The lack of food sources is what cause the very few and far between encounters with ranchers livestock. The adjoining states have already said and have it in their plans to allow killing of any grizzlies who pose a threat to their livestock. The reproduction rate of the grizzly is slow and without the necessary food sources to make it through hibernation there will be fewer births. If you consider this in conjunction with the amount of bears each state is going to allowed to be hunted, the number of bears that will inevitably be killed because due to ranchers seeing them as a threat to their livestock, the current population of bears will not stand the reduction without grave consequences. The citizens of the united states have paid for the protection of these bears. Your office has been charged with the duty of safe guarding these bears and delisting them without more thought and planning for the delisting will certainly put them back in an endangered state. The areas which border the GYE is becoming more heavily populated. With the encroachment of development the bears have very little space in which to travel from one population to another for breeding. If there are no safe guards for the bears to migrate to other areas the population will be trapped, this again brings them to the point of being endangered. There is no reason for hunting a bear other than sport and the money the states have proposed to charge for the hunting of this prized animal will in no way cover the cost the tax payers have already paid to protect that bear. It just doesn;t make sense. The ranches are compensated by the numerous willing organizations for the loss of any animal killed by a bear. So it is not like the grizzlies are out there destroying herds of cattle. In fact as per your own studies the losses of ranchers has been minimal, and the ranchers do not loss money. At the very least the Primary Conservation area should be increased to include bear corridors, and am ample area around the entire GYE for the bears. Encounters with bears for people are rare, and most of those have proven it was not the bears fault, but the people's; regardless those bears have been killed. If people are going to go into bear country and not be prepared it is their fault and the entire population of bears should not have to pay the price for human stupidity. If you allow the states to openly place and advertise these great bears can be shot for a trophy what are you saying about your plan and your entrusted duty to safe guard the animals of our great parks and country. The states of Wyoming and Idaho allow for baiting of bears. They are saying it will not be allowed for the grizzly but it is not in their plan and when someone baits a black bear and a grizzly shows up that someone will shoot it and claim they thought it was a black bear. The current grizzly population cannot withstand the additional killings. The grizzly was placed on the endangered species list and should remain there. There is no significant plan that removing the Grizzly Bear from the endangered species list is a mistake that will ensure the need to exist this magnificent predator.	FWS-R6-ES-2016-0042-0739	
Wildlife managers have not given this fact enough weight in their decision making. After all, Grizzlies are carnivores, living by eating our precious game animals. Well, it is not so easy to replace an essential food source as important as the white bark pine nut is to the Grizzly. Imagine the impact on our food options if corn or wheat production was drastically reduced by some disease. Other important sources of nourishment for the Grizzlies are also experiencing declines putting further pressure on Grizzly survival.	Factor A	I believe that the decision in not based on sound scientific information, but rather on the pressure of political entities. Because it is not defensible to make such important decisions based on political pressure, science is manipulated and misinterpreted to develop convenient findings to support the political decision. Predators play an overwhelmingly important role in the health of our ecosystems. However, throughout the history of the United States, our government and the general public have fostered a deep seated fear and demonization of predators, especially the large predators. This is evidenced by the near eradication of the Grizzly Bear and wolves and the widespread hated of an essential species. Fear of predators has been institutionalized and the elimination of predators sold as a necessary program to protect protect livestock, and the western way of life. However, it doesn't take much effort to see the damage that such programs have on our ecosystems and the other problems that arise when predators are reduced to unsustainable population levels. Wildlife management decisions are too often based on the need to generate revenue and a perceived notion that large predators diminish our enjoyment of hunting big game species such as mule deer, elk. Certainly predators kill these species, but if we would allow the natural cycles of predators and game species to occur, we would find that our hunting would improve over time. We have created a hunger for revenue generated by the marketing of permits to kill large predators such as Grizzlies. What could stoke the prestige and ego more than shooting an evil killing machine as notorious as the Grizzly. Unfortunately, wildlife management decisions regarding the hunting of predators are often made with incomplete knowledge about the numbers of animals, the limiting effects of diminished habitat and the isolation of specie populations. Certainly climate change is having a negative impact on our wildlife but the political nature of this type of environmental deterioration is not taken into account. It is no secret that changing winter conditions in the northern Rockies is having a devastating impact on our forests. I have seen a significant change in the overall health of forests in the Sawtooth Mountains in Idaho. Most people might be surprised that a vital source of nourishment for the carnivorous beast, the Grizzly Bear, are pine nuts. Climate change has led to the rapid decline of the white bark pine and its production of nuts which are essential to the Grizzly. Wildlife managers have not given this fact enough weight in their decision making. After all, Grizzlies are carnivores, living by eating our precious game animals. Well, it is not so easy to replace an essential food source as important as the white bark pine nut is to the Grizzly. Imagine the impact on our food options if corn or wheat production was drastically reduced by some disease. Other important sources of nourishment for the Grizzlies are also experiencing declines putting further pressure on Grizzly survival. There really aren't that many Grizzlies in the Yellowstone area. Certainly many think that there are way too many and that hunting will help keep their populations in check. The resurgence of the Grizzly Bear over the past decades has been significant and credit must be given to the federal government for this. But Grizzly Bear population is currently declining. Maybe this is part of a natural cycle.	FWS-R6-ES-2016-0042-0750	

The Yellowstone ecosystem is in many ways a geographical island. Genetic diversity is essential for the sustainability of healthy species. Because of the relative isolation of large predators such as Grizzlies in Yellowstone, it is difficult to maintain a diverse gene pool. Hunting outside of the Park will make it even more difficult, adding another significant constraint on the sustainability of a healthy Grizzly Bear population.	Factor A	Removing the Grizzly Bear from the endangered species list is a mistake that will ensure the need to relist this magnificent predator. I believe that the decision is not based on sound scientific information, but rather on the pressure of political entities. Because it is not defensible to make such important decisions based on political pressure, science is manipulated and misinterpreted to develop convenient findings to support the political decision. Predators play an overwhelmingly important role in the health of our ecosystems. However, throughout the history of the United States, our government and the general public have fostered a deep seated fear and demonization of predators, especially the large predators. This is evidenced by the near eradication of the Grizzly Bear and wolves and the widespread hatred of an essential species. Fear of predators has been institutionalized and the elimination of predators sold as a necessary program to protect livestock, and the western way of life. However, it doesn't take much effort to see the damage that such programs have on our ecosystems and the other problems that arise when predators are reduced to unsustainable population levels. Wildlife management decisions are too often based on the need to generate revenue and a perceived notion that large predators diminish our enjoyment of hunting big game species such as mule deer, elk. Certainly predators kill these species, but if we would allow the natural cycles of predators and game species to occur, we would find that our hunting would improve over time. We have created a hunger for revenue generated by the marketing of permits to kill large predators such as Grizzlies. What could stoke the prestige and ego more than shooting an evil killing machine as notorious as the Grizzly. Unfortunately, wildlife management decisions regarding the hunting of predators are often made with incomplete knowledge about the numbers of animals, the limiting effects of diminished habitat and the isolation of species populations. Certainly climate change is having a negative impact on our wildlife but the political nature of this type of environmental deterioration is not taken into account. It is no secret that changing winter conditions in the northern Rockies is having a devastating impact on our forests. I have seen a significant change in the overall health of forests in the Sawtooth Mountains in Idaho. Most people might be surprised that a vital source of nourishment for the carnivorous beast, the Grizzly Bear, are pine nuts. Climate change has led to the rapid decline of the white bark pine and its production of nuts which are essential to the Grizzly. Wildlife managers have not given this fact enough weight in their decision making. After all, Grizzlies are carnivores, living by eating our precious game animals. Well, it is not so easy to replace an essential food source as important as the white bark pine nut is to the Grizzly. Imagine the impact on our food options if corn or wheat production was drastically reduced by some disease. Other important sources of nourishment for the Grizzlies are also experiencing declines putting further pressure on Grizzly survival. There really aren't that many Grizzlies in the Yellowstone area. Certainly many think that there are way too many and that hunting will help keep their populations in check. The resurgence of the Grizzly Bear over the past decades has been significant and credit must be given to the federal government for this. But Grizzly Bear population is currently declining. Maybe this is part of a natural cycle.	FWS-R6-ES-2016-0042-0750	
I agree with the Federal Register announcement of March 11; 2016, Grizzly bears in the GYE have reached great enough population numbers to no longer meet the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). Per the announcement, occupied range has more than tripled in size.	Factor A	The Fremont County (Idaho) Farm Bureau (FCFB) strongly supports Grizzly bear delisting under Docket No. FWS-R6-ES-2016-0042. The FCFB is one of 37 county Farm Bureaus comprising the Idaho Farm Bureau Federation, whose combined membership is over 73,400 member families throughout the state. FCFB members live on the eastern edge of the Greater Yellowstone Ecosystem (GYE) and are directly impacted by Grizzly bears and the regulations surrounding them. I agree with the Federal Register announcement of March 11; 2016, Grizzly bears in the GYE have reached great enough population numbers to no longer meet the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). Per the announcement, occupied range has more than tripled in size. Local officials say the range is fully occupied and young or transient bears encounter difficulty in establishing their own home ranges. The states of Wyoming, Idaho and Montana requested delisting the GYE Grizzly bear population and are working on post-delisting management plans. FCFB supports these efforts as well as the delisting of the GYE Grizzly bear population. Thank you for the opportunity to express my support for Docket No. FWS-R6-ES-2016-042.	FWS-R6-ES-2016-0042-1199	
The ESA requires the government to recover not only species, but the "ecosystems upon which they depend," and until we have re-established those functioning ecosystems, individual species should remain listed, perhaps in a "threatened" status.	Factor A	Please do not delist Grizzly bears. It's unfortunate that in our society, there seem to be only two categories of management: "listed under the ESA" or "open season." I do not trust state fish and game agencies to manage these animals responsibly. They only serve hunters, trappers and outfitters, and do not care about conservation biology. We can see what a mess they have made of wolf management in all the states that have delisted wolves. I'm not saying that management is not required, but I am saying that state game agencies are political entities that have demonstrated no interest in these species, other than as targets for hunters. They even hold wildlife "derbies," which is illustrative of their mindset. We need a different kind of management - ecosystem management - and the FWS is the entity best able to carry this out. The ESA requires the government to recover not only species, but the "ecosystems upon which they depend," and until we have re-established those functioning ecosystems, individual species should remain listed, perhaps in a "threatened" status. Call it an upgrade in condition, but please do not open the door to hunting, especially trophy hunting, which is a cruel and despicable waste of life. Bears that come too close to private property and human habitations should be darted and relocated, and killed only on the rare occasions that they come back and cause damage. I would submit that the Greater Yellowstone Ecosystem needs more habitat protection, so that large animals (elk, wolves, bears, bison, etc.) can move freely without being killed by humans. The real answer is not to keep bears to a minimum "viable" population and call that "recovery," but to provide more habitat. I recognize the difficulty in that, but I urge you to work toward establishment of the great Yellowstone-to-Yukon corridor, which is the only lasting hope of survival for these great charismatic species. No good can come of hunting grizzly bears.	FWS-R6-ES-2016-0042-5335	

I would submit that the Greater Yellowstone Ecosystem needs more habitat protection, so that large animals (elk, wolves, bears, bison, etc.) can move freely without being killed by humans. The real answer is not to keep bears to a minimum "viable" population and call that "recovery," but to provide more habitat.	Factor A	Please do not delist Grizzly bears. It's unfortunate that in our society, there seem to be only two categories of management: "listed under the ESA" or "open season." I do not trust state fish and game agencies to manage these animals responsibly. They only serve hunters, trappers and outfitters, and do not care about conservation biology. We can see what a mess they have made of wolf management in all the states that have delisted wolves. I'm not saying that management is not required, but I am saying that state game agencies are political entities that have demonstrated no interest in these species, other than as targets for hunters. They even hold wildlife "derbies," which is illustrative of their mindset. We need a different kind of management - ecosystem management - and the FWS is the entity best able to carry this out. The ESA requires the government to recover not only species, but the "ecosystems upon which they depend," and until we have re-established those functioning ecosystems, individual species should remain listed, perhaps in a "threatened" status. Call it an upgrade in condition, but please do not open the door to hunting, especially trophy hunting, which is a cruel and despicable waste of life. Bears that come too close to private property and human habitations should be darted and relocated, and killed only on the rare occasions that they come back and cause damage. I would submit that the Greater Yellowstone Ecosystem needs more habitat protection, so that large animals (elk, wolves, bears, bison, etc.) can move freely without being killed by humans. The real answer is not to keep bears to a minimum "viable" population and call that "recovery," but to provide more habitat. I recognize the difficulty in that, but I urge you to work toward establishment of the great Yellowstone-to-Yukon corridor, which is the only lasting hope of survival for these great charismatic species. No good can come of hunting grizzly bears.	FWS-R6-ES-2016-0042-5335	
I disagree with the notion of separating the Greater Yellowstone Population of bears from the other populations in the northern Rockies, and delisting only the GYE bear population. Grizzly recovery goals should be based on a larger ecosystem. Given the ecological disruptions that we know will occur on an increasing basis due to climate change, successful grizzly recovery will depend on connecting existing populations, and managing them as a whole.	Factor A	See Attached Attachments Weiner Gary	FWS-R6-ES-2016-0042-1229	
I oppose allowing trophy hunting of bears. This type of hunting has far more to do with economic opportunism than bear management. The states of MT, WY and ID have shown a strong predilection for hunting, almost as a philosophical goal, rather than necessarily the best management option. I do not support managing the GYE bear population for a target population of 674 bears, and encouraging the discretionary harvest (hunting) of independent bears to maintain this population target. Rather, the GYE grizzly population should be allowed to expand, if it can. (And I am not at all convinced that the GYE population will continue to increase, given known disruptions to its primary food sources, and our lack of knowledge about the sustainability of whatever they are currently using as alternatives.) It would be advantageous for recovery to encourage independent males and females to leave the GYE area and connect with adjacent populations, improving genetic diversity and expanding the overall geographic extent of the species.	Factor A	See Attached Attachments Weiner Gary	FWS-R6-ES-2016-0042-1229	
Currently, the Grizzly bear (under review) resides in four states: Idaho, Montana, Washington and Wyoming. Within Yellowstone and Grand Teton national parks, the bears will continue to be managed by the National Park Service. However, as that only represents half of Grizzly bear territory, a large number of the bears are at risk. With delisting, the bears' habitat range will be modified into an unsafe territory. This will cause dispersal, higher levels of bear aggression, and more frequent human- bear encounters.	Factor A	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	

I DO NOT SUPPORT DELISTING the grizzly or the Yellowstone Draft Plan due to the lack of protection offered to the great Grizzly Bear. These bears need to travel to find mates. How can this species not only survive, but thrive, when their gene pool is so isolated? They need to be able to travel to find mates who offer gene diversity without the threat of hunters, habitat loss, or disgruntled ranchers. These bears should be able to expand their territory to sustain their species without human threat.	Factor A	I am a proud American and value what makes this country unique, including our land and wildlife. After hearing of the debate about Grizzly Bear delisting, not only was I disappointed, but angry. Angry because, once again, it seems those who are paid by American citizens to manage and protect our countries treasures are bowing to some wealthy political lobbyists. We have torn down forests, paved over habitat, wiped out entire species, and built our capitalist shrines throughout this nation. It is past time to reign in our greed and arrogance. It is time to take pride in this country's life. Delisting will only bring hunts... And hunts contributed to the grizzly numbers dropping to less than 200 in the 70s. I DO NOT SUPPORT DELISTING the grizzly or the Yellowstone Draft Plan due to the lack of protection offered to the great Grizzly Bear. These bears need to travel to find mates. How can this species not only survive, but thrive, when their gene pool is so isolated? They need to be able to travel to find mates who offer gene diversity without the threat of hunters, habitat loss, or disgruntled ranchers. These bears should be able to expand their territory to sustain their species without human threat. These ranchers need to man up... Stop blaming the bear and wolves for trying to survive on what little land we've left for them. Ranchers are the intruders. They need to take more precautions before taking out their rifles on my land. This is PUBLIC LAND PAID FOR BY TAXPAYERS and most of us want the wildlife to stay in tact. Also, the plan talks about waiting for THREE years of lowered bear population before action is taken. With what I know about the difficult and slow reproductive rates of these bears, I consider THREE years too long without a response by a management team. After all, it took grizzly bears 40 years to raise their numbers to only about 700. While the plan does not mention an intended grizzly hunt, I can only guess it's impending. I do not support a hunt at this time especially in or AROUND Yellowstone. And definitely not in any area that interrupts the bears' passage to find mates. And if you allow hunts, how will hunters differentiate between males and mothers with cubs that depend on her for survival? Or will they even care? Starving, motherless cubs is not acceptable. This plan is no plan without addressing these points. Please consider my words while remembering the dire state of the worlds wildlife. Be part of the solution. With deep concern, Ang Sutton	FWS-R6-ES-2016-0042-1373	
Grizzly bears require a large territory, so the obvious deterrent is human's negligent use of space and inability to interact peacefully with the wildlife in the surrounding areas. If delisted, humans and their use of the land will only provide more of a barrier to grizzly bear movement and population growth.	Factor A	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	
Their population is at risk as it isolated from other grizzly bear populations. There are no plans for connecting the two populations, which is key to long term survival of the species.	Factor A	I oppose the delisting of Greater Yellowstone Ecosystem grizzly bears. Their population is at risk as it isolated from other grizzly bear populations. There are no plans for connecting the two populations, which is key to long term survival of the species. Further, grizzly bears are one of the slowest reproducing mammals in North America. What would happen if a number of bears died due to unforeseen events in a single year? The population would be in jeopardy. Finally, state management of the bears is a risk in and of itself. We have seen what happened when these predator-unfriendly states "managed" the wolves. The populations were decimated. Wyoming's so much so that a federal judge had to re-list Wyoming wolves. There are no assurances that things would be any different with management of grizzlies. Indeed, the discussion between the states so far has indicated that they plan a trophy hunting season and that bears dispersing to connect with other populations would be among those first to be killed. As if that weren't enough, a majority of Americans oppose the delisting of Yellowstone area grizzly bears. These bears are icons of the American wilderness as well as a huge tourism draw to the region. They should be protected, not delisted.	FWS-R6-ES-2016-0042-1455	
Forty years of work and millions of dollars were invested to save Grizzly Bears from extinction. Despite these efforts, the Grizzly bear population is still dangerously low. Removing the protections afforded by the Endangered Species Act will bring the demise of the Grizzlies. Please do not bend to the desires of hunters, the dictates of ranchers or the demands of developers at the expense of Yellowstone's Grizzly bears.	Factor A	The recent announcement of the illegal killing (in November 2015) of beloved Yellowstone Patriarch, Scarface, sent shock waves through the millions of visitors to Yellowstone who knew and loved him. He was a legend-Yellowstone's dignified Ambassador. A 25+ year veteran of Yellowstone he was followed by professional photographers and nature lovers alike. Visitors came to the Park each year to catch a glimpse of this famous bear. Scarface was a model bear who was habituated to humans as are many of Yellowstone's "roadside bears". He was good natured and non aggressive which makes his death all the more tragic. He should have never been killed. One person's irresponsible act, robbed Scarface of his final years and denied me and millions of others who loved him of the privilege and opportunity to observe him in the wild. What happened to Scarface is a cautionary tale of the fate that awaits all of Yellowstone's Grizzly bears. If delisted each bear will have a bounty on its head. These magnificent icons of our heritage will be decimated by Trophy Hunters who have already readied their high powered rifles to take out the most famous roadside bear of them all-Bear 399. We must not allow this tragedy to repeat itself. Forty years of work and millions of dollars were invested to save Grizzly Bears from extinction. Despite these efforts, the Grizzly bear population is still dangerously low. Removing the protections afforded by the Endangered Species Act will bring the demise of the Grizzlies. Please do not bend to the desires of hunters, the dictates of ranchers or the demands of developers at the expense of Yellowstone's Grizzly bears. We owe it to future generations to ensure that Grizzlies will forever roam wild and free in Yellowstone. Please do not delist Yellowstone's Grizzly bears.	FWS-R6-ES-2016-0042-1554	

The whitebark pine is also a victim of the pine beetle, the insect responsible for the destruction of hundreds of thousands of acres of forests across the West. Pine bark larvae have higher survival rates in warmer winters and the infestation, at this stage, seems unstoppable (In 2011 the U.S. Fish and Wildlife Service determined the tree warrants protection under the Endangered Species Act). In the Yellowstone park area the tree is nearly gone: “No amount of science or management will bring the trees back in our lifetime.”	Factor A	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530	
As if we hadn’t learned our lesson from prior grizzly strategies, we find ourselves at the crossroads of further endangering the very existence of our beloved Grizzlies by delisting a species struggling to survive in our ever-changing and warming world. Further complicating the situation (as if it wasn’t bad enough, already) the Yellowstone grizzly bear population suffers from increasingly fragmented and disconnected habitats	Factor A	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530	
Without wildlife corridors, migration routes, and other connected habitat, wildlife like grizzlies cannot continue to reproduce, find food, disperse, and maintain enough diversity in their populations to survive into the future.	Factor A	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530	
The Yellowstone Atlas produced by an ecology team at the U. of Oregon, Eugene highlights the need for spill over areas for animals and plants of Yellowstone. The concept of a "Greater Yellowstone Ecosystem" is established & increasingly serious and necessary due to the natural ebb and flow of population due to climate and natural habitat changes, but is critical due to the spiraling human development issues of which we've seen only the beginning. Increasing fires, temperature changes and habitat changes (water, noise, human intrusion upsetting population, pollution, fish and stream changes, corridor impediment for not only genetic diversity but movement to access habitat and food in times of stress all affect the grizzly bear and its ecosystem.	Factor A	See Attached Attachments Trygstad Ellen	FWS-R6-ES-2016-0042-1607	
A recent Harvard study on stress and population has highlighted that the scientific community has greatly underestimated the needed population numbers and dispersal for large mammal survival, critically important in light of the speed with which climate change is assaulting habitat.	Factor A	See Attached Attachments Trygstad Ellen	FWS-R6-ES-2016-0042-1607	
The Grizzly population might have recovered within the park but what about outside the park? What will happen to these majestic creatures when they travel outside of Yellowstone? Grizzly bears are not stationary animals, meaning that they do not stay in exact same habitat; in fact grizzly bears are migratory animals that are well known to travel at least 100 miles a year in search for food or a mate. Scientist does not fully understand that the range of a fully grown, adult male and female grizzly bear.	Factor A	See attached file(s) Attachments grizzly bears	FWS-R6-ES-2016-0042-1668	
While the grizzly population might have recovered and are protected within Yellowstone, outside bears are facing habitat loss, damage and fragmentation from expanding human settlements, road-building, and other industrial developments.	Factor A	See attached file(s) Attachments grizzly bears	FWS-R6-ES-2016-0042-1668	

But perhaps the problem isn't the population size, but the boundaries themselves. Many people fail to understand or accept the fact that you can't contain nature. You just can't. Human made property boundaries mean absolutely nothing to wildlife. Energy, animals, nutrients, and resources are meant to flow throughout ecosystems and across landscapes, and will continue to (or at least attempt to) flow across our boundaries despite our best efforts to contain them. If connectivity is lost and ecosystems and habitats are cut off from one another, then these systems will slowly weaken and perish. So rather than delisting the grizzly bears, perhaps their protection should instead be extended.	Factor A	I oppose removing the GYE grizzly bear population from the List of Endangered and Threatened Wildlife. While the population has made a significant recovery since 1975 (from about 136 to about 700 today according to the National Park Service website), delisting the species now will only cause more harm than good. Removing protection from the bears will not only harm their own population, but may harm the entire ecosystem as well. It has been shown time and time again that most people are not comfortable with the idea of living next door to wild grizzly bears, or any predator for that matter. Without federal protection, management authority will be given to state and local governments who will almost certainly want to open hunting seasons on the bears. Such trophy hunting could significantly impact the genetic diversity of the population. This is because most hunters would target large, strong, healthy, and attractive bears, so they would be removing these favorable traits from the gene pool. Eventually, the population would grow weaker and would be more vulnerable to the effects of habitat loss, disease, climate change, etc. Aside from hunting, state governments would probably allow their residents more freedom to "remove" any bears that they feel would pose a threat to them. Of course, most people would unfortunately feel threatened by any bear within shooting distance. All these factors combined would certainly cause the GYE grizzly bear population to decline once again. It is important to understand that grizzly bears are an important umbrella species. By removing protection from the bears, you would be removing protection from their entire ecosystem. Because bears are predators, they help to manage the population sizes of many of the herbivores in the area. If the grizzly bear population significantly decreased, the herbivore populations would be allowed to increase. This could cause some overgrazing problems in the ecosystem, which would mean less food for all other species in the GYE, which would mean a decrease in multiple populations and communities, which would mean a decrease in overall biodiversity. This scenario may be a bit exaggerated, but it at least shows the important role the bears play in their ecosystem. In addition, bears, like humans, are omnivores, meaning they can eat almost anything. Berries and other plants make up a good portion of their diet, so every time they forage for food, they can pick up pollen on their fur and can carry countless seeds in their bellies. Because bears travel large distances, the undigested seeds in their droppings will have a whole new location to sprout and grow, away from their parent plants. This in turn, contributes to the overall health and genetic diversity of the vegetation. If the bears are no longer protected, then the vegetation will suffer as well. Thus, as previously stated, delisting the GYE grizzly bear population would only cause more harm than good. In fact, it is very hard to see or understand what good could come out of the situation at all. Many make the argument that they are proposing this new change, because the grizzly bear population has gotten too large to manage within the GYE boundaries. But perhaps the problem isn't the population size, but the boundaries themselves. Many people fail to understand or accept the fact that you can't contain nature. You just can't. Human made property boundaries mean absolutely nothing to wildlife. Energy, animals, nutrients, and resources are meant to flow throughout ecosystems and across landscapes, and will continue to (or at least attempt to) flow across our boundaries despite our best efforts to contain them.	FWS-R6-ES-2016-0042-1664	
Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat in the GYE and prevent them from colonizing other lands in which they were originally found. This will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of this land is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead should be "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations.	Factor A	I am opposed to delisting grizzly bears in the Greater Yellowstone Ecosystem (GYE) for the following reasons: 1. The fact is that no one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services numbers. But what we do know is that at least 60 grizzlies died last year, mostly at the hand of man, and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest, if not the lowest reproductive rate of any mammal in the GYE. The continuation of such mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work needs to be done in the GYE to prevent many of these grizzly deaths before this population can be safely delisted. Such actions as mandating that ranchers remove their garbage and carcass dumps to county facilities, the use of bear-proof garbage cans in communities, camping areas, etc. within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for hunters and other public land users in grizzly habitat need to be implemented within the GYE before grizzlies are delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations, endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate bears from other populations into the GYE to improve genetic diversity but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat in the GYE and prevent them from colonizing other lands in which they were originally found. This will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of this land is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead should be "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout and possibly even army cutworm moths populations have recently been significantly reduced due to a variety of human caused issues. More research is needed to determine how the loss of these food sources will impact the future grizzly population in the GYE. 4. GYE Grizzlies should be managed as an ecosystem population rather than separately by three different states, all of which have stated their desire to significantly reduce the population and limit their occupied habitat. 5. Recent studies have shown that GYE Grizzly Bears are a currently important, and significantly rising economic resource to GYE communities. Yellowstone National Park visitors have listed grizzlies and wolves as the two most important species they want to be able to observe due to their scarcity. Many national park visitors come specifically to see these apex predators. Live bears are much	FWS-R6-ES-2016-0042-1765	

Though bear numbers are stable at the moment, they are faced with habitual vulnerabilities such as fragmentation and poaching. As the country develops, more and more land is urbanized and deforestation is rampant. Since the founding of our country, 90% of virgin forest has been cleared away due to human activities. (UMich) More and more roadways are built to convenience the lives of humans at the cost of roaming species. Habitat fragmentation is a somber issue often overlooked; fragmentation often leads to reduction of species richness, inbreeding, and loss of sustainability of the habitat for the animal itself.	Factor A	Keep Grizzly Bears on the Endangered and Threatened Species List As well as the Grizzly Bear population has recuperated within the past few years, these numbers alone cannot guarantee aggregate protection of the species. Although many factors were taken into consideration in the proposal, two main aspects of conservation biology were forgotten: 1) the ecosystem is a synchronized whole; protecting bears would protect other species as well, especially because bears are an umbrella species to their habitats and 2) all conservation methods, though pragmatic, have no definite outcome. Grizzly Bear conservation has been dynamic and many goals were reached including raising population numbers. However, just because the population has reached a certain set number does not mean they lack vulnerabilities. One such vulnerability is climate change. The issue of climate change is addressed in the proposal with the conclusion of having little impact on the bears. Grizzly Bears used to range from Northern Canada to Northern Mexico, a vast expanse of land known to many as the "Spine of the Continent." However, Grizzly bears are also creatures of the cold and with the rise in global temperature, their comfortable habitat range will continually be expurgated Northward. Climate change has also decline snowfall in certain areas; snowfall is important to Grizzlies as they inhabit dens where snow is unlikely to melt in warmer temperatures. As noted in the proposal, many Grizzly Bear biologists within this region do not believe climate change will affect the species. Though resilient and hardy creatures, by taking them off the Endangered and Threatened Species list, we are asking them to adapt to climate change as a whole species. As noted before, Grizzly Bears are known as a keystone and umbrella species of their systematic habitats. (Berger et al 2001) Just like the Grey Wolves in Yellowstone, even their presence affects many more species including both animal and plant life forms. Using the wolves as an example in Yellowstone, when the wolves were eliminated the whole ecosystem seemed to be dying alongside. Without wolves to control the Elk populations, the Elk overpopulated and ate or trampled many plant species. Without plant species, all the other mini-ecosystems such as the riverbanks were affected negatively as well. Though bear numbers are stable at the moment, they are faced with habitual vulnerabilities such as fragmentation and poaching. As the country develops, more and more land is urbanized and deforestation is rampant. Since the founding of our country, 90% of virgin forest has been cleared away due to human activities. (UMich) More and more roadways are built to convenience the lives of humans at the cost of roaming species. Habitat fragmentation is a somber issue often overlooked; fragmentation often leads to reduction of species richness, inbreeding, and loss of sustainability of the habitat for the animal itself. (Fahrig 2003) The concept of limited poaching is introduced especially if for self defense. However, bears are not harmful creatures and many methods can be implemented to prevent these creatures from attacking the population or the properties. The Habitat Based Recovery Criteria listed within the recovery planning are not backed with much scientific evidence; instead the bears are described as "opportunistic creatures" (USF&W) As well as the bears are doing, they are not at the same level as historic numbers. Though I understand the change within the country over time due to large scale development such as the building of more roads, it must be understood the bears have too many factors affecting their recovery and a simple population number cannot be enough to gauge their elasticity.	FWS-R6-ES-2016-0042-1670	
As well as the bears are doing, they are not at the same level as historic numbers. Though I understand the change within the country over time due to large scale development such as the building of more roads, it must be understood the bears have too many factors affecting their recovery and a simple population number cannot be enough to gauge their elasticity.	Factor A	Keep Grizzly Bears on the Endangered and Threatened Species List As well as the Grizzly Bear population has recuperated within the past few years, these numbers alone cannot guarantee aggregate protection of the species. Although many factors were taken into consideration in the proposal, two main aspects of conservation biology were forgotten: 1) the ecosystem is a synchronized whole; protecting bears would protect other species as well, especially because bears are an umbrella species to their habitats and 2) all conservation methods, though pragmatic, have no definite outcome. Grizzly Bear conservation has been dynamic and many goals were reached including raising population numbers. However, just because the population has reached a certain set number does not mean they lack vulnerabilities. One such vulnerability is climate change. The issue of climate change is addressed in the proposal with the conclusion of having little impact on the bears. Grizzly Bears used to range from Northern Canada to Northern Mexico, a vast expanse of land known to many as the "Spine of the Continent." However, Grizzly bears are also creatures of the cold and with the rise in global temperature, their comfortable habitat range will continually be expurgated Northward. Climate change has also decline snowfall in certain areas; snowfall is important to Grizzlies as they inhabit dens where snow is unlikely to melt in warmer temperatures. As noted in the proposal, many Grizzly Bear biologists within this region do not believe climate change will affect the species. Though resilient and hardy creatures, by taking them off the Endangered and Threatened Species list, we are asking them to adapt to climate change as a whole species. As noted before, Grizzly Bears are known as a keystone and umbrella species of their systematic habitats. (Berger et al 2001) Just like the Grey Wolves in Yellowstone, even their presence affects many more species including both animal and plant life forms. Using the wolves as an example in Yellowstone, when the wolves were eliminated the whole ecosystem seemed to be dying alongside. Without wolves to control the Elk populations, the Elk overpopulated and ate or trampled many plant species. Without plant species, all the other mini-ecosystems such as the riverbanks were affected negatively as well. Though bear numbers are stable at the moment, they are faced with habitual vulnerabilities such as fragmentation and poaching. As the country develops, more and more land is urbanized and deforestation is rampant. Since the founding of our country, 90% of virgin forest has been cleared away due to human activities. (UMich) More and more roadways are built to convenience the lives of humans at the cost of roaming species. Habitat fragmentation is a somber issue often overlooked; fragmentation often leads to reduction of species richness, inbreeding, and loss of sustainability of the habitat for the animal itself. (Fahrig 2003) The concept of limited poaching is introduced especially if for self defense. However, bears are not harmful creatures and many methods can be implemented to prevent these creatures from attacking the population or the properties. The Habitat Based Recovery Criteria listed within the recovery planning are not backed with much scientific evidence; instead the bears are described as "opportunistic creatures" (USF&W) As well as the bears are doing, they are not at the same level as historic numbers. Though I understand the change within the country over time due to large scale development such as the building of more roads, it must be understood the bears have too many factors affecting their recovery and a simple population number cannot be enough to gauge their elasticity.	FWS-R6-ES-2016-0042-1670	

In addition, these animals are still struggling to keep their population at healthy levels, and the recent changes in our climate cycles include such as the persistence of insects through the winter months that would have died off in the past and the migration into the area of invasive species. The food chain that sustains the grizzlies is being affected.	Factor A	Caving in to the trophy hunters will likely result in fewer visits to our great national parks, as visitors who want to see the iconic grizzly bear might just as well go somewhere else if the grizzly population of wilderness areas in Western states is threatened. Take into consideration all the businesses that rely on this tourism - the camping and boating concessions, the hotel industry. In addition, these animals are still struggling to keep their population at healthy levels, and the recent changes in our climate cycles include such as the persistence of insects through the winter months that would have died off in the past and the migration into the area of invasive species. The food chain that sustains the grizzlies is being affected. Opening up a season on grizzly kills is not in the best interests of this nation.	FWS-R6-ES-2016-0042-1794	
State planning review should precede the federal plan for delisting of GYE bears. The most favorable thing we can do is to reestablish the migration connection between the No Continental Divide ecosystem with the GYE ecosystem.	Factor A	See Attached Attachments Gutkoski Joe	FWS-R6-ES-2016-0042-1797	
The delisting of the Yelloestone grizzlies would be a devastating mistake for many reasons. To preserve and enhance this isolated gene pool good science should provide guidance to implement a plan to provide interaction with other bear populations. This would also allow for a greater range for food forage. Grizzlies have a slow rate of reproduction and any females lost would tip the scales unfavorably. A certain elements in some Western States is all too eager to decimate their bear and wolf populations. This hostility displaces scientific studies and any respect for their wildlife and the will of the people throughout the United States.	Factor A	The delisting of the Yelloestone grizzlies would be a devastating mistake for many reasons. To preserve and enhance this isolated gene pool good science should provide guidance to implement a plan to provide interaction with other bear populations. This would also allow for a greater range for food forage. Grizzlies have a slow rate of reproduction and any females lost would tip the scales unfavorably. A certain elements in some Western States is all too eager to decimate their bear and wolf populations. This hostility displaces scientific studies and any respect for their wildlife and the will of the people throughout the United States.	FWS-R6-ES-2016-0042-1926	
There has not been enough preparation to secure adequate habitat protection for them, and I am appalled that FWS continually caves in to pressure from ranching interests and adjacent State governments to facilitate hunting and culling of wildlife populations.	Factor A	Delisting Yellowstone Grizzlies in 2016 is an ill-advised and premature proposal. There has not been enough preparation to secure adequate habitat protection for them, and I am appalled that FWS continually caves in to pressure from ranching interests and adjacent State governments to facilitate hunting and culling of wildlife populations. Given the demonstrable and growing adverse effects of global warming on food sources bears rely upon, there is no justification for concluding that grizzly numbers have recovered sufficiently to remove this ecosystem's population from the protections of the ESA. Grizzlies in the lower forty-eight states have a special significance for millions of American citizens. Their continued existence (along with wolves and cougars) as the apex predators of the increasingly constricted natural wildlife areas is extraordinarily important to most of us. Given the fact that FWS has already screwed up the reintroduction of buffalo and wolves to the Yellowstone ecosystem, this proposed delisting should be postponed for at least another five years.	FWS-R6-ES-2016-0042-2400	
De-listing x will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. A	Factor A	De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, seasonable resilience, and availability throughout the habitat. The Greater Yellowstone Ecosystem (GYE) population is much smaller than the Northern Range bears, but the Northern population is not being considered for de-listing. The GYE population is being threatened because industrial, energy, and development companies have been applying tremendous political pressure through lobbying and heavy-handed public relations campaigns (promising jobs, dismissing science; the usual stuff). The GYE grizzlies are an "island population". This means that they are adapted to live and thrive within a specific geographic range. Substantial threats or changes to that habitat would likely pressure the bears to try and relocate, but they cannot successfully do so. The Greater Yellowstone Ecosystem is the environment to which they have adapted over eons. There is not another environment to which they could relocate and remain a viable species. Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability. US Fish and Wildlife data regarding the GYE grizzly population is suspect at best. For years, most counts of the population were in the 200 to 400 range. When de-listing was first proposed in 2007, the number suddenly shot up to 700. The methods used to arrive at that number involve a great deal of extrapolation from an extremely small sample of verified sightings. Rather than relying on US FWS data (pressured by lobbyists and hostile legislators), the public should demand research by independent organizations like The Ecological Society of America or the National Research Council. Current population estimates are untrustworthy, and the field needs good peer-reviewed analysis by objective scientists. If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it.	FWS-R6-ES-2016-0042-2542	

The Greater Yellowstone Ecosystem (GYE) population is much smaller than the Northern Range bears, but the Northern population is not being considered for de-listing. The GYE population is being threatened because industrial, energy, and development companies have been applying tremendous political pressure through lobbying and heavy-handed public relations campaigns (promising jobs, dismissing science; the usual stuff). Å	Factor A	De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, seasonable resilience, and availability throughout the habitat. The Greater Yellowstone Ecosystem (GYE) population is much smaller than the Northern Range bears, but the Northern population is not being considered for de-listing. The GYE population is being threatened because industrial, energy, and development companies have been applying tremendous political pressure through lobbying and heavy-handed public relations campaigns (promising jobs, dismissing science; the usual stuff). The GYE grizzlies are an "island population". This means that they are adapted to live and thrive within a specific geographic range. Substantial threats or changes to that habitat would likely pressure the bears to try and relocate, but they cannot successfully do so. The Greater Yellowstone Ecosystem is the environment to which they have adapted over eons. There is not another environment to which they could relocate and remain a viable species. Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability. US Fish and Wildlife data regarding the GYE grizzly population is suspect at best. For years, most counts of the population were in the 200 to 400 range. When de-listing was first proposed in 2007, the number suddenly shot up to 700. The methods used to arrive at that number involve a great deal of extrapolation from an extremely small sample of verified sightings. Rather than relying on US FWS data (pressured by lobbyists and hostile legislators), the public should demand research by independent organizations like The Ecological Society of America or the National Research Council. Current population estimates are untrustworthy, and the field needs good peer-reviewed analysis by objective scientists. If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it.	FWS-R6-ES-2016-0042-2542	
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Delisting the grizzly will also re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions.	Factor A	There are many compelling reasons why removing ESA protections of the grizzly is premature at best and potentially devastating to the bears recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. Delisting the grizzly will also re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival.	FWS-R6-ES-2016-0042-2744	
Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging.	Factor A	quoting Larry Fahn, " . . . there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. end quote I look forward to your response,	FWS-R6-ES-2016-0042-2750	
De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining.	Factor A	De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. Please do not De-list the grizzly bear and continue to protect our American wildlife heritage.	FWS-R6-ES-2016-0042-2832	

In 2015, record number of Yellowstone area grizzly bears were killed despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years.	Factor A	I object to delisting the grizzly bear from the Endangered Species Act. Barring that, the delisting does not need to be accompanied by the legalization of trophy hunting for the following reasons: AS WE SAW WITH SCARFACE, BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. In 2015, record number of Yellowstone area grizzly bears were killed despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. Additionally, there are ranchers right outside of Yellowstone (in MT) who are practicing wildlife sustainable ranching. Rather than give ranchers a license to kill, can't we first ask that they try these methods? The economic impact of grizzlies being road friendly in Yellowstone is huge. Once they start being hunted, they will become less road friendly and there will be fewer visitors to Yellowstone. IF HUNTING IS ALLOWED, THERE MUST BE BUFFER ZONES around national parks and a no-hunt zone in between Yellowstone and Grand Teton National Park, minimally, and up through the Tom Miner Basin area in Montana. CLIMATE CHANGE NEEDS TO BE CONSIDERED. Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated at least one food source. USFWS needs to consider how climate change will impact bears' food sources and behavior. USFWS failed to do this with wolverines and had to have a court order USFWS to consider climate change in wolverine listing. Additionally, we can't say that we are being environmentally responsible and kill off apex predators. The environment does not stop with the flora but is equally impacted by the fauna, particularly apex predators. MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The outcry over the killing of Cecil the Lion by many Americans will be repeated here. We cannot object to the killing of Cecil and then less than a year later sanctify the right of hunters to do the exact same thing in the U.S. STATE CONFLICTS OF INTEREST. The states have not shown that they can work together to manage their apex predator populations, and several officials of the surrounding states have indicated that they wish to eradicate apex predators from their areas. These creatures don't know where state lines begin and end, and some of the most natural habitats for grizzlies are in decidedly unfriendly states. I am disappointed that under a Democratic president that U.S. Fish & Wildlife would even consider delisting which is the equivalent of unprotected our wildlife. While I appreciate that delisting shows that there has been some success in restoring the grizzly population in the lower 48, the sad fact is that it comes with a license to trophy hunt which is unfair after years of protection, and to a barely sustainable population of animals. It is one thing to hunt elk or deer which thrive in abundance, and which are then consumed but trophy hunting is ultimately about the act of killing an apex predator for bragging rights that it can be done. The meat is not eaten, the body is dismembered or stuffed and becomes a	FWS-R6-ES-2016-0042-2859	
the unknown implications of climate change to this particular, isolated population of Grizzlies and, well, the inability for them to maintain a healthy genetic diversity due to their isolation and lack of connectivity to other populations up north. These two challenges are only going to get harder as land and food sources diminish in this region in the coming years.	Factor A	Although the hard work of many government agencies, scientists and conservationist has proven successful in the recovery of the Great Grizzly Bear, I am opposed to the proposed 2016 delisting of the iconic Greater Yellowstone Ecosystem Grizzly. Two main reasons, of a host of many, are the unknown implications of climate change to this particular, isolated population of Grizzlies and, well, the inability for them to maintain a healthy genetic diversity due to their isolation and lack of connectivity to other populations up north. These two challenges are only going to get harder as land and food sources diminish in this region in the coming years. I ask you to please consider my comment along with the thousands of others who oppose the delisting of the GYE Grizzly Bear.	FWS-R6-ES-2016-0042-2932	
First, the bears in this region are finding it increasingly difficult to find decent food resources throughout the year, on account of the effects of climate change, including phenological effects in high-elevation ecosystems, and the alarming growth in the numbers of the mountain pine beetle. Secondly, the genetic diversity of these bears is not great, so the sustainability of the population as a whole is unusually insecure; in light of that, so far from their having to deal with being left with fewer protections, their population should be strengthened by finding increased protections for reliable migration corridors connecting their region to regions to the north where other grizzlies are thriving. Thirdly, the bears' human environment was never good: human neighbors mistrust them at best, or actively go about seeking their removal; hunters covet collecting their body-parts as trophies; and local and state governments lack the political will to protect them, if they're even aware that they need protecting, and are at all sympathetic to that cause.	Factor A	The proposal to remove the Yellowstone population of grizzly bears from status as endangered or threatened should not be recommended. The criteria that the agency have been using to make that recommendation are too narrow, so that the predicament of those bears is not fully appreciated. Three considerations seem to be outstanding. First, the bears in this region are finding it increasingly difficult to find decent food resources throughout the year, on account of the effects of climate change, including phenological effects in high-elevation ecosystems, and the alarming growth in the numbers of the mountain pine beetle. Secondly, the genetic diversity of these bears is not great, so the sustainability of the population as a whole is unusually insecure; in light of that, so far from their having to deal with being left with fewer protections, their population should be strengthened by finding increased protections for reliable migration corridors connecting their region to regions to the north where other grizzlies are thriving. Thirdly, the bears' human environment was never good: human neighbors mistrust them at best, or actively go about seeking their removal; hunters covet collecting their body-parts as trophies; and local and state governments lack the political will to protect them, if they're even aware that they need protecting, and are at all sympathetic to that cause. With regard to that third consideration more generally, it is not clear that the agency take full account of the human environment of wild animals when they assign them a regulatory survival status. It's very fair for us to think of the situation of another species of mistrusted predator in the midst of hostile human neighbors, the re-introduced "Mexican" gray wolves of southern Arizona and New Mexico, a situation that has been poorly regulated and maintained and as a result remains highly insecure, especially because of failures to appreciate the behavior of human beings. Those of us who hope for a strong and resilient population of grizzlies in the Yellowstone region, secure in their home and well-connected to other populations of their kind, dread the thought that they may be left in a predicament not unlike that of the Mexican wolves, with no human friends to help them secure their future, but rather having to rely on the tender mercies of neighbors who neither understand them nor sympathize with them nor even so much as like them.	FWS-R6-ES-2016-0042-2964	

The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. A	Factor A	Please do NOT delist the grizzlies. -Trophy hunting of the grizzly is not sound management of the species. There should be a three to five year moratorium on even considering hunting as a management tool. -- GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. -The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. - MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it.	FWS-R6-ES-2016-0042-3011	
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This includes changes in land use as a result of the delisting including: hunting, change sin land uses, logging, increased accidental and poaching of bears, reduced penalties for illegal kills that could lead to greater bear deaths, reduced breeding due to bear removal, greater stress on the bears that reduces reproduction, killing of sows and rleated reduction in reproduction and cumulative effects of climate change and increased resource extraction as a result of a decision to deliast.	Factor A	Please, do not delist the Greater Yellowstone population of grizzlies from the Edangered Species list. The affects of this decision need to be analyzed for all likely forseeable direct, indirect and cumulative effects on the species. This inclludes changes in land use as a result of the delisting including: hunting, change sin land uses, logging, increased accidental and poaching of bears, reduced penalties for illegal kills that could lead to greater bear deaths, reduced breeding due to bear removal, greater stress on the bears that reduces reproduction, killing of sows and rleated reduction in reproduction and cumulative effects of climate change and increased resource extraction as a result of a decision to deliast. There needs to be a complete analysis of all effects as a result of the delisting. I urge you to no delist at this time, as there are many effects that need to evaluated and in the case of climate chage it is a likely forseeable effec taht will result in reduced habitat quality and quanity, changes in habitat spatial arrangement that could affect the speices and reduced habitat quality due to greater resource extraction in areas that are now critical habitat for bear recovery. I will talk to you in any format, you can call me at 509 6303594 ir wrute ne at 200 S. kent Place East Wenatchee, Wa. 98802. Sincerely Kevin Kane	FWS-R6-ES-2016-0042-3036	
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Two of their primary food sources, cutthroat trout and pine nuts are in serious decline. Housing and grazing encroachments continue to increase in the greater Yellowstone ecosystem which further stresses and displaces the grizzlies.	Factor A	Delisting grizzly bears at this time is a bad idea. Two of their primary food sources, cutthroat trout and pine nuts are in serious decline. Housing and grazing encroachments continue to increase in the greater Yellowstone ecosystem which further stresses and displaces the grizzlies. I live in Park County, Montana and know this area and have been around grizzly bears for over 20 years. I understand that the goal of the Endangered Species Act is to protect a species and restore it's numbers and then delist the species. Now is not the time to do this with grizzly bears.	FWS-R6-ES-2016-0042-3176	

In the past, we have removed other species from Endangered Species Act protection without the need for a subsequent hunting season. This includes the American bald eagle. In 2007, nobody was calling for a bald eagle hunting season, because shooting a bald eagle would be a disgustingly disrespectful act towards an icon of our country. But for sovereign native nations like the Apsaalooke', the Piegan, the Nee-Me-Poo, and others, the grizzly bear is more than just an icon, it is kin. These people deserve greater respect than to allow sport hunting of their kin.	Factor A	I am against the U.S. Fish and Wildlife Service's (USFWS) proposal to remove the Greater Yellowstone Ecosystem's (GYE) population of grizzly bears from U.S. Endangered Species Act (ESA) protection. I believe that the USFWS failed to comply with executive and secretarial orders that effects on Native American religious or cultural tradition be considered when proposing changes to the ESA, and that the trophy hunts proposed in the state management plans that are necessary for federal delisting would be a violation of the American Indian Religious Freedom Act. The USFWS did not seek input from all of the 31 tribes recognized for historical ties to the GYE when drafting its latest delisting proposal, nor did it consider those tribes unanimous opposition to state management plans that include trophy hunting when they sought out the USFWS. By ignoring these comments and going forward with a delisting proposal contingent on state management plans that include trophy hunting, the USFWS has disrespected these native people and cultures, to say nothing of federal law. In the past, we have removed other species from Endangered Species Act protection without the need for a subsequent hunting season. This includes the American bald eagle. In 2007, nobody was calling for a bald eagle hunting season, because shooting a bald eagle would be a disgustingly disrespectful act towards an icon of our country. But for sovereign native nations like the Apsaalooke', the Piegan, the Nee-Me-Poo, and others, the grizzly bear is more than just an icon, it is kin. These people deserve greater respect than to allow sport hunting of their kin. There are many other reasons to be against delisting, but this one is good enough for me.	FWS-R6-ES-2016-0042-5405	
Please do not de-list the grizzlies from the Endangered List. They are barely recovering after their numbers dropped to just over 100 in 1975. Their population is still growing back to a healthy level. Opening them up to trophy hunting will decimate their fragile numbers. Instead, wildlife corridors should be protected to the wilderness north into Canada. Except for the Yellowstone area, they are all but disappeared from the Continental United States.	Factor A	Please do not de-list the grizzlies from the Endangered List. They are barely recovering after their numbers dropped to just over 100 in 1975. Their population is still growing back to a healthy level. Opening them up to trophy hunting will decimate their fragile numbers. Instead, wildlife corridors should be protected to the wilderness north into Canada. Except for the Yellowstone area, they are all but disappeared from the Continental United States. When will the Fish and Wildlife Service view their overseeing of animals as an issue of stewardship and protection of wildlife, rather than just us dumb animals to be managed for hunting? This is all wrong and against nature, humane values, and respect for living sentient creatures.	FWS-R6-ES-2016-0042-3306	
Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures.	Factor A	The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, digging for grubs and hunting prey. Seeing a grizzly bear in the wild is usually an experience that remains with you for life. The Endangered Species Act has helped bring the grizzly bear back from the brink of extinction. The bears in the greater Yellowstone ecosystem need its help, and yours, to continue on their road to recovery. There are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival.	FWS-R6-ES-2016-0042-3349	
It is premature to take protection away from the grizzly bear and delist them from the Endangered Species List. The Greater Yellowstone Ecosystem spans the states of Idaho, Montana, and Wyoming. Grizzly bears know no boundaries and will not receive the protection the National Parks afford.	Factor A	See Attached Attachments Lefferts Edward	FWS-R6-ES-2016-0042-3333	

I also read that the author of the report that led to the delisting proposal, Dr. Christopher Servheen, grizzly bear recovery coordinator, U.S. Fish and Wildlife Service, admits private land development is the greatest threat to the nation's grizzlies, as further development could cut off connectivity among populations and disrupt vital habitat. A	Factor A	We must immediately stop the U.S. Fish and Wildlife Service (USFWS) from removing the grizzly bear in the Greater Yellowstone Ecosystem Montana, Idaho and Wyoming from the Federal Lists of Endangered and Threatened Wildlife. They must not delist the Yellowstone grizzly bear.. Critics of the USFWS proposal say that lifting protections for the bear could endanger a growing population, and a lot of the US Public believe that also. The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to an estimated 700 or more today. But grizzly bears have all but disappeared from almost all of the continental United States, except for Yellowstone and Glacier National Park and a few other slivers of habitat, the New York Times reported May 3. After all I have read I wonder if the delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that I sternly oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. We cannot let humans jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. I also read that the author of the report that led to the delisting proposal, Dr. Christopher Servheen, grizzly bear recovery coordinator, U.S. Fish and Wildlife Service, admits private land development is the greatest threat to the nation's grizzlies, as further development could cut off connectivity among populations and disrupt vital habitat. Please do what is right and scientifically backed and don't delist the grizzly bear because it would be the beginning of the end for them. Thank you for your time and consideration on this very important issue.	FWS-R6-ES-2016-0042-3441	
Human encroachment on the grizzly' habitat also makes its potential habitat less available and likely in the future. Wyoming for instance, has counties that have passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without federal ESA protections, these Bears will be killed without hesitation.	Factor A	I'm writing to show my disapproval of this proposal, the grizzly bear should not be removed from the federal list of endangered and threatened wildlife. Grizzlies have not rebounded in their historical range throughout the western US and have a limited gene pool in Yellowstone, making their current numbers fragile and susceptible to future growth. Additionally, their major food source of seeds and nuts from the whitebark pine is under siege from the fungus that has been decimating that the species, making it harder for the bears to survive through other food sources. Human encroachment on the grizzly' habitat also makes its potential habitat less available and likely in the future. Wyoming for instance, has counties that have passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without federal ESA protections, these Bears will be killed without hesitation. Please keep these reasons and other scientific evidence in mind when making your decision. Keep the grizzly bear on the federal endangered species list!	FWS-R6-ES-2016-0042-3597	
Although their population has increased they are still susceptible to the threats of habitat loss, climate change, and issues with reproduction based on a small population. We need to do everything we can to protect the wild lands that remain in north america, and by helping the species that live there thrive, we keep these parts as they should be - wild and untouched by humans.	Factor A	Please do not delist the grizzlies from the Federal Endangered Species Act protection. Although their population has increased they are still susceptible to the threats of habitat loss, climate change, and issues with reproduction based on a small population. We need to do everything we can to protect the wild lands that remain in north america, and by helping the species that live there thrive, we keep these parts as they should be - wild and untouched by humans.	FWS-R6-ES-2016-0042-3863	
The proposed rule does not address the genetic isolation of the bears, the issues that are caused by declining food sources, and the fact that grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. This problem is exacerbated by the poaching of bears that occurs even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. This will lead them into most populated areas and make them more vulnerable to being killed. Therefore it is necessary for them to remain protected and allowed to exist in an area that keeps them safe and does not encourage them to seek food and shelter elsewhere.	Factor A	The proposed rule does not address the genetic isolation of the bears, the issues that are caused by declining food sources, and the fact that grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. This problem is exacerbated by the poaching of bears that occurs even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. This will lead them into most populated areas and make them more vulnerable to being killed. Therefore it is necessary for them to remain protected and allowed to exist in an area that keeps them safe and does not encourage them to seek food and shelter elsewhere.	FWS-R6-ES-2016-0042-3889	

FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely.	Factor A	I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters. Yellowstone was almost destroyed with this insane and uneducated war on wolves and now (do we learn nothing??) the same is happening with the Grizzly Bears. It is mind boggling. Please consider that: Everything in your power should be done to protect this amazing mammal. FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Declining food sources pose a threat to Grizzlies and this delisting will be devastating to the Grizzly's chance of survival.. Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Another natural curb in their number. Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains Grizzlies occupy only 1% of their historic range. AND PLEASE TAKE NOTE: Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years, caused by ignorant planning by humans, by the way.. Hoping for some forward thinking and moral courage here! Thank you Anne K	FWS-R6-ES-2016-0042-3905	
Declining food sources pose a threat to Grizzlies and this delisting will be devastating to the Grizzly's chance of survival..	Factor A	I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters. Yellowstone was almost destroyed with this insane and uneducated war on wolves and now (do we learn nothing??) the same is happening with the Grizzly Bears. It is mind boggling. Please consider that: Everything in your power should be done to protect this amazing mammal. FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Declining food sources pose a threat to Grizzlies and this delisting will be devastating to the Grizzly's chance of survival.. Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Another natural curb in their number. Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains Grizzlies occupy only 1% of their historic range. AND PLEASE TAKE NOTE: Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years, caused by ignorant planning by humans, by the way.. Hoping for some forward thinking and moral courage here! Thank you Anne K	FWS-R6-ES-2016-0042-3905	

Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains	Factor A	I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters. Yellowstone was almost destroyed with this insane and uneducated war on wolves and now (do we learn nothing??) the same is happening with the Grizzly Bears. It is mind boggling. Please consider that: Everything in your power should be done to protect this amazing mammal. FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Declining food sources pose a threat to Grizzlies and this delisting will be devastating to the Grizzly's chance of survival.. Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Another natural curb in their number. Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains Grizzlies occupy only 1% of their historic range. AND PLEASE TAKE NOTE: Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years, caused by ignorant planning by humans, by the way.. Hoping for some forward thinking and moral courage here! Thank you Anne K	FWS-R6-ES-2016-0042-3905	
I have heard from a number of highly reputable scientists who argue that there is insufficient genetic variation in this isolated pocket of bears to maintain a healthy population. This situation could contribute to a precipitous crash in the population and in fact is a good argument for efforts to expand the range of these bears to include corridors to other know Grizzly populations to facilitate greater genetic diversity.	Factor A	I urge your agency to reconsider your intention to remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I have heard from a number of highly reputable scientists who argue that there is insufficient genetic variation in this isolated pocket of bears to maintain a healthy population. This situation could contribute to a precipitous crash in the population and in fact is a good argument for efforts to expand the range of these bears to include corridors to other know Grizzly populations to facilitate greater genetic diversity. The actual number of bears inhabiting the Greater Yellowstone Ecosystem is subject to methodology in inventory and may well be an indication of a stable population that would be adversely affected by removal from the endangered species list. There is absolutely no question that major food sources such as Whitebark pine nuts and Cutthroat trout are suffering rapid declines, and the early onset of spring has accelerated the emergence of hungry bears from their winter dens. We don't yet know how the radical and ongoing changes attributable to climate change will affect Grizzly bears, and I strongly argue for retaining the species on the Federal List of Endangered and Threatened Wildlife.	FWS-R6-ES-2016-0042-3953	
Please the Bears of yellowstone are genetically isolated just the same as if they were on their own island. If you delist it will lead to more in breeding and the failure of the species.	Factor A	Please the Bears of yellowstone are genetically isolated just the same as if they were on their own island. If you delist it will lead to more in breeding and the failure of the species.	FWS-R6-ES-2016-0042-4112	

The x bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine which is a critically important food source." x Climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing.	Factor A	No one really knows how many grizzlies are in the GYE. The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foods, are a threat to the grizzly's long term survival. The bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine which is a critically important food source." Climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting.The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear	FWS-R6-ES-2016-0042-4226	
Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America.	Factor A	No one really knows how many grizzlies are in the GYE. The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foods, are a threat to the grizzly's long term survival. The bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine which is a critically important food source." Climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting.The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear	FWS-R6-ES-2016-0042-4226	

By USFWS own estimates, around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Furthermore, Yellowstone's Grizzly population has no connectivity with outside populations, and has not for the last 100 years. This means that today's population came from a gene pool of only 136 animals (the population low point in 1975. This lack of genetic diversity threatens the Yellowstone grizzly's survival in the long term.	Factor A	I am asking you to NOT delist grizzly bears in the Greater Yellowstone Ecosystem. The USFWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. However, David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. In reality, no one really knows how many grizzlies are in the GYE. Furthermore, population growth has stagnated since the early 2000's, and the Yellowstone grizzly population declined by 59 bears in 2015 alone. The USFWS also claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide. Therefore, the grizzly bear cannot be delisted in just the GYE. By USFWS own estimates, around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Furthermore, Yellowstone's Grizzly population has no connectivity with outside populations, and has not for the last 100 years. This means that today's population came from a gene pool of only 136 animals (the population low point in 1975. This lack of genetic diversity threatens the Yellowstone grizzly's survival in the long term. USFWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. Whitebark pine nuts have long been considered to be the single most important food source for grizzlies. In the last 20 years, whitebark pines have been decimated by both blister rust and pine beetles. The pine beetle epidemic has been linked to climate change. According to Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council, "Yellowstone grizzly bears are likely declining in the wake of the loss of whitebark pine, a critically important food source." USFWS claims that Montana, Idaho, and Wyoming will successfully use hunting to manage the recovered grizzly bear population.If GYE grizzly bears are delisted, the three states have already signaled that they will open up trophy hunting seasons for the bears. Wyoming holds the vast majority of grizzlies. I do not believe that Wyoming can be considered capable of maintaining populations of any large carnivore in a scientific manner, considering its dismal record of "managing" wolf populations. Its wolf management is so bad that it has had to be struck down in federal court twice. Only now that the wolf has been relisted in Wyoming are we finally seeing wolves again in Grand Teton National Park, which will prove to increase visitation to that park and consequently tourist revenue. Montana has released its management plan and is proposing a spring hunting season to run between March 15 and April 20. Yet we have already seen grizzly sows with cubs in Yellowstone National Park as early as April 16th. With warming temperatures in the future, emergence could occur even earlier than that. This means grizzly sows with new cubs could be killed and these tiny helpless bears left motherless. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as	FWS-R6-ES-2016-0042-4260	
Grizzlies may be "generalists" when it comes to food supplies, but it is difficult to understand how you can dismiss the major dropoff in two of the GYE grizzly food sources, whitebark pine nuts and cutthroat trout, with a third major food source, cutworm moths, at high risk from the prospective drop in their availability with the introduction of GMO crops tailored to kill them in the fields where they spend most of their time. Only meat is left to the bears, along with minor food sources like forbs and grubs. And we all know the connection between meat carcasses and human interaction - whether with hunters, crossing roads or around ranchlands. It does not bode well for grizzlies. At a minimum, it seems that the diminishment of major food sources in the GYE should lead to a fuller consideration that the carrying capacity of the land has been reduced and the bears are ranging farther from their traditional territories in search of adequate diet replacements and this has not been fully evaluated in the Rule. It also does not appear to be "best science" as required by law to dismiss predictions of habitat changes that will directly affect grizzly bears without a fuller exploration of this issue than is contained in the proposed Rule. I understand that taxpayer funded data that you use has not been made available to the greater scientific community or independent scientists for review before a decision is made final on an action that is still open to much disagreement. I live in the Paradise Valley north of YNP and listen and talk to scientists who are working on these issues and it does appear that, in fact, there is hard evidence available showing that the isolated grizzly bear population growth rate is flat, if not declining, for more than 10 years. For an animal in recovery with the slowest reproductive rate of any North American mammal, still today occupying only 2% of their historic habitat (and are you allowed under case law to delist isolated segments of a population listed as a single entity under the ESA? I do not think so!), and with a mortality rate of 10% in 2015, it appears to me that the Rule now open to comment is sorely lacking the kind of high level and THOROUGH analysis addressing these issues and more that is deserved by this iconic creature. Too much is at stake. Please consider re-opening your review and include a panel of independent, qualified scientists who are working separately from current grizzly research in the GYE.	Factor A	Grizzlies may be "generalists" when it comes to food supplies, but it is difficult to understand how you can dismiss the major dropoff in two of the GYE grizzly food sources, whitebark pine nuts and cutthroat trout, with a third major food source, cutworm moths, at high risk from the prospective drop in their availability with the introduction of GMO crops tailored to kill them in the fields where they spend most of their time. Only meat is left to the bears, along with minor food sources like forbs and grubs. And we all know the connection between meat carcasses and human interaction - whether with hunters, crossing roads or around ranchlands. It does not bode well for grizzlies. At a minimum, it seems that the diminishment of major food sources in the GYE should lead to a fuller consideration that the carrying capacity of the land has been reduced and the bears are ranging farther from their traditional territories in search of adequate diet replacements and this has not been fully evaluated in the Rule. I understand that taxpayer funded data that you use has not been made available to the greater scientific community or independent scientists for review before a decision is made final on an action that is still open to much disagreement. I live in the Paradise Valley north of YNP and listen and talk to scientists who are working on these issues and it does appear that, in fact, there is hard evidence available showing that the isolated grizzly bear population growth rate is flat, if not declining, for more than 10 years. For an animal in recovery with the slowest reproductive rate of any North American mammal, still today occupying only 2% of their historic habitat (and are you allowed under case law to delist isolated segments of a population listed as a single entity under the ESA? I do not think so!), and with a mortality rate of 10% in 2015, it appears to me that the Rule now open to comment is sorely lacking the kind of high level and THOROUGH analysis addressing these issues and more that is deserved by this iconic creature. Too much is at stake. Please consider re-opening your review and include a panel of independent, qualified scientists who are working separately from current grizzly research in the GYE.	FWS-R6-ES-2016-0042-4277	
Proposal did not address the problem of genetic isolation if grizzlies are not allowed to roam outside of the conservation area.	Factor A	Do not delist Grizzly Bears. 1. The proposed rule does not address protecting grizzly habit outside the conservation area when in fact more than half spend their time in this area. 2. Proposal does not reflect that there is a direct correlation between loss of pine bark as a food source and that bears will not find another alternative. 3. Proposal does address the far reaching effects of climate change on the bear's denning habits. 4. Trophy hunting will take prime grizzlies from their latest offspring causing a devastating effect on future generations. 5. Proposal did not address the problem of genetic isolation if grizzlies are not allowed to roam outside of the conservation area.	FWS-R6-ES-2016-0042-4363	

the shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foodsis not a threat to x the grizzly's long term survival. Å YET THE REALITY IS: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Å	Factor A	I would like to enter the following comments about the proposed delisting of the Yellowstone Grizzly: YOUR CLAIM IS THAT there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. YET IN REALITY: no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." YOUR CLAIM IS THAT the shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. YET THE REALITY IS: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. YOUR CLAIM IS THAT your agency will stay involved with protecting the grizzly population after delisting. YET THE REALITY IS: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. YOUR CLAIM IS THAT: Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. YET THE REALITY IS THAT: This approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. ===== SPECIAL OBJECTIONS!!! ===== YOUR CLAIM IS THAT: your agency looks forward to hearing from the public about delisting. YET THE REALITY IS: A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 23 percent do not support the moratorium. YOU CLAIM THAT your agency claims to look forward to consulting	FWS-R6-ES-2016-0042-4382	
By the Service's own admission "Grizzly bears are currently found approximately halfway between the NCDE and GYE areas and it is likely that these populations will connect in the near future through natural dispersal and movements." (https://www.fws.gov/mountain-prairie/es/GYE%20Grizzly-FAQs.pdf) However, the habitat connectivity required to allow for continued levels of gene flow that would allow these subpopulations to function as a metapopulation will require continued federal coordination to achieve, and without the ESA listing, strong protections will not be in place for dispersing bears outside the PCA. Designating the GYE population as a DPS, while it may be technically acceptable according to the Service's policy, is short-sighted with respect to the current status of the GYE and NCDE populations, and the central importance of future connectivity between them. Shafer (2015) stated "Although heroic efforts have been underway to facilitate corridor creation, the opportunity to allow for a more permeable landscape so the GYE grizzly bear population can disperse to the NCDE or the Bitterroot-Selway-Frank Church River of No Return wilderness complex, or vice versa, will not last indefinitely." It is not enough that " Approaches for increasing the likelihood of natural movement of grizzly bears and genetic interchange between the GYE and the NCDE populations, have been outlined in the Conservation Strategy." The Service needs to stay the course and continue to protect the GYE population (and most critically, dispersing bears from both populations) under the ESA until they can be reconnected.	Factor A	I am writing to strongly oppose the delisting of the Greater Yellowstone Ecosystem population of grizzly bear (<i>Ursus arctos horribilis</i>) under the Endangered Species Act (ESA). The delisting proposal is based on recovery goals for the GYE population that do not consider the necessary reconnection of the GYE population with the NCDE population to the north. Without establishing this connection before delisting, critical opportunities to ensure the long-term genetic health of the species will be lost. By the Service's own admission "Grizzly bears are currently found approximately halfway between the NCDE and GYE areas and it is likely that these populations will connect in the near future through natural dispersal and movements." (https://www.fws.gov/mountain-prairie/es/GYE%20Grizzly-FAQs.pdf) However, the habitat connectivity required to allow for continued levels of gene flow that would allow these subpopulations to function as a metapopulation will require continued federal coordination to achieve, and without the ESA listing, strong protections will not be in place for dispersing bears outside the PCA. Designating the GYE population as a DPS, while it may be technically acceptable according to the Service's policy, is short-sighted with respect to the current status of the GYE and NCDE populations, and the central importance of future connectivity between them. Shafer (2015) stated "Although heroic efforts have been underway to facilitate corridor creation, the opportunity to allow for a more permeable landscape so the GYE grizzly bear population can disperse to the NCDE or the Bitterroot-Selway-Frank Church River of No Return wilderness complex, or vice versa, will not last indefinitely." It is not enough that " Approaches for increasing the likelihood of natural movement of grizzly bears and genetic interchange between the GYE and the NCDE populations, have been outlined in the Conservation Strategy." The Service needs to stay the course and continue to protect the GYE population (and most critically, dispersing bears from both populations) under the ESA until they can be reconnected.	FWS-R6-ES-2016-0042-5488	
Removing Grizzly bears in the Yellowstone area is a really, really bad idea. It has taken years to build up the population to the point that it may be self sustaining, even with all the threats that these important contributors to the ecological health of the Yellowstone system face, and will continue to face with the fact that the Yellowstone ecosystem is incomplete, having been established before there was an understanding of what constitutes an ecosystem. Just don't do it!	Factor A	Removing Grizzly bears in the Yellowstone area is a really, really bad idea. It has taken years to build up the population to the point that it may be self sustaining, even with all the threats that these important contributors to the ecological health of the Yellowstone system face, and will continue to face with the fact that the Yellowstone ecosystem is incomplete, having been established before there was an understanding of what constitutes an ecosystem. Just don't do it!	FWS-R6-ES-2016-0042-0153	

These plans often involve target population numbers based on federal recovery goals, which should be considered minimums, and in no state is the plan to increase grizzly population numbers or increase habitat quality and acreage or decrease habitat fragmentation. Including areas of continued recovery (e.g., increasing grizzly habitat and population numbers) should be required for each state management plan in order for the federal government to consider delisting. One only has to consider the delisting of the gray wolf in these states to realize the strange partnership between the state agencies and the hunting and ranching communities.	Factor A	The real issue in this situation is that the public does not trust state agencies to manage grizzly bear populations with regard to all stakeholders. With a reputation for bowing to the hunting and ranching communities, the state agencies of MT, WY, and ID have not proven that they can manage wildlife in any manner other than establishing trophy hunting seasons immediately upon delisting in order to satisfy a small proportion of the state's citizens. These plans often involve target population numbers based on federal recovery goals, which should be considered minimums, and in no state is the plan to increase grizzly population numbers or increase habitat quality and acreage or decrease habitat fragmentation. Including areas of continued recovery (e.g., increasing grizzly habitat and population numbers) should be required for each state management plan in order for the federal government to consider delisting. One only has to consider the delisting of the gray wolf in these states to realize the strange partnership between the state agencies and the hunting and ranching communities. Many stakeholders are involved and concerned with state wildlife management and currently state agencies do not seem to realize this in any way. Delisting grizzly bears seems to be based on sound science. However, habitat loss, conflicts with humans, and climate change remain concerns for grizzly bear populations into the future. The state agencies dismiss these concerns by proposing hunting seasons immediately upon a delisting ruling and the states have not acknowledged that recovery of any species occurs along a gradient. A conservative state management approach would consider future impacts to a long-lived species with slow reproduction and also consider the values of the non-hunting and ranching stakeholders. Unless state agencies can prove to the public that the opinions of all of their citizens are being considered, issues related to the Endangered Species Act, both listing and delisting will persist. The only way this can be mitigated for the grizzly bear is to deny delisting until the state management plans are written in a way that promotes grizzly populations while considering future human-caused changes to the ecosystem and also the opinions and values of all stakeholders weighted to their prevalence in their home state.	FWS-R6-ES-2016-0042-5015	
The population is just a rough estimate and still incredibly low and stagnant in growth at this point. Conditions will likely only get worse for the bears with natural environmental issues and with more and more encroachment by man taking away habitat and food sources	Factor A	Please do not delist grizzly bears from the endangered and threatened species list. The population is just a rough estimate and still incredibly low and stagnant in growth at this point. Conditions will likely only get worse for the bears with natural environmental issues and with more and more encroachment by man taking away habitat and food sources. Please do not let farming interest groups continue to dictate protection of our remaining grizzlies. Thank you for your consideration.	FWS-R6-ES-2016-0042-0020	
. It is not clear whether the reason the bear population has remained flat since 2002 is because, as some scientists claim, bear habitat is full in the GYE or, as other scientists say, the main food sources of the bears is drying up and they are moving out to find new food sources. Bears in the GYE are unique in their food sources--pine nuts, moths, cutthroat trout. Especially the pine nuts for fattening up for hibernation is the most important food source. 90% of our whitebark pine trees are functionally dead in the ecosystem. The impact on the bears is still not clear and so delisting is premature.	Factor A	I do not support delisting grizzlies at this time because: 1. Genetic connectivity has not been assured. Bears outside the DMA will not be counted toward the total amount. These are the bears that will be the ones moving north to ensure connectivity. These will be the bears easiest for hunters to kill. 2. The delisting rules do not require livestock owners to take any responsibility for preventative measures. Certain areas of the DMA, in particular the Green River, have seen a lot of livestock problems with bears. This is because there are too many cattle and sheep on public lands in the main corridor for grizzlies traveling south into the Wind River range which is excellent habitat. This issue is not addressed in your delisting mandate and will just result in additional dead bears. 3. It is not clear whether the reason the bear population has remained flat since 2002 is because, as some scientists claim, bear habitat is full in the GYE or, as other scientists say, the main food sources of the bears is drying up and they are moving out to find new food sources. Bears in the GYE are unique in their food sources--pine nuts, moths, cutthroat trout. Especially the pine nuts for fattening up for hibernation is the most important food source. 90% of our whitebark pine trees are functionally dead in the ecosystem. The impact on the bears is still not clear and so delisting is premature. 4. Given the unknown impacts of climate change and changing food sources, and given that we've spent 40 years restoring the grizzly to the GYE, why rush now into delisting just to shoot bears. Why not wait another 5 or 10 years to see the impacts of changing foods and why the population has remained flat? 5. Referring to #4, this year over 50 bears died in the ecosystem, more than 1/2 from human conflicts. Bears are one of the slowest reproducing mammals in North America. With delisting comes hunting and more bears killed, indiscriminately. A female bear will at best in 10 years just duplicate herself. We cannot afford to have female bears hunted. A female without cubs in tow will just look like a male to a hunter. 6. There needs to be more responsibility in the delisting mandate placed on protecting human food sources. I live in bear country and at one time the WG&F had some funds to subsidize bear garbage cans so they were only \$50. That money ran out years ago and a bear proof garbage can for a homeowner is \$150. No one would buy that. Also there are many rough campgrounds without any bear boxes on FS lands. And dispersed camping is allowed and many of those campsites people burn their trash, which leaves odors. People are not educated about their bird feeders, nor protecting their grain. There needs to be a requirement that the states subsidize these protections, and also federal funding on federal campgrounds for bear boxes and/or bear proof garbage cans. 7. I think the DMA should be treated like the PCA. I am thinking especially of the Wind Rivers and Fitzpatrick Wilderness areas. In the entire GYE, these mountains still have good White Bark Pines--where probably only about 40% are dead. It is excellent habitat, including berries. The same rules should apply there 650 bears in the ecosystem is really not many at all. I highly doubt any scientist can know the carrying capacity of the GYE and therefore say "the ecosystem is full". That works out to 1 bear every 30 miles!	FWS-R6-ES-2016-0042-0029	

The population/gene-pool is too small and disjointed, for example Yellowstone NP and Glacier NP populations are not even connected by any viable corridor.	Factor A	I oppose the delisting of Grizzly Bears. The population/gene-pool is too small and disjointed, for example Yellowstone NP and Glacier NP populations are not even connected by any viable corridor. There are too many unknowns in climate/food source/habitat right now. The applicable states have proven themselves to be incapable of, and even resistant to managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. It is even highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. These bears should not become victims of politics, as the wolves have. I predict that if we delist the bears, the applicable states will begin selling tags to hunt them the next season.	FWS-R6-ES-2016-0042-0066	
The Grizzly is long overdue for delisting. It is crucial that Grizzlies re-learn to fear man, to minimize man-bear contact, and limited hunting will accomplish this. Bear populations are also outgrowing habitat, and conflicting with wolves and other large predators. The Grizzly has been left on the ESL far too long, under the illusion of protection, but the result is actually hurting the overall health of Griz populations.	Factor A	The Grizzly is long overdue for delisting. It is crucial that Grizzlies re-learn to fear man, to minimize man-bear contact, and limited hunting will accomplish this. Bear populations are also outgrowing habitat, and conflicting with wolves and other large predators. The Grizzly has been left on the ESL far too long, under the illusion of protection, but the result is actually hurting the overall health of Griz populations.	FWS-R6-ES-2016-0042-0072	
There are many Grizzlies on the plains of the eastern slope of the Rockies for a reason. There are too many Grizzly Bears for the available habitat, so the only place for the excess grizzlies to go are on the plains. I don't care what the friend of the animals or any other group says the younger Grizzlies get run out of the mountains by the dominant Grizzlies. The only place to go is the plains and it is getting dangerous to fish and hunt in some of those areas.	Factor A	I have bow hunted black bears my whole life. I have bow hunted grizzlies in British Columbia for many years. I have bow hunted Brown Bears in Russia. I understand bears and nature. There are many Grizzlies on the plains of the eastern slope of the Rockies for a reason. There are too many Grizzly Bears for the available habitat, so the only place for the excess grizzlies to go are on the plains. I don't care what the friend of the animals or any other group says the younger Grizzlies get run out of the mountains by the dominant Grizzlies. The only place to go is the plains and it is getting dangerous to fish and hunt in some of those areas. I was hunting pheasants and fishing with my grandson on the Teton river and ran into grizzlies 3 different times. I was really worried about my grandson when he would get out of site. These Grizzlies are not afraid of man because they have never been hunted. They might just stare at you and walk slowly away or not move and make you back up and get out of the way. It's way too scary to try and get to your tree stand in the dark before the sun comes up because the Grizzlies are there and they are not afraid of man. In British Columbia the Grizzlies are completely different. They have been hunted by man so they still have a fear of man. When you run into a Grizzly while you are steelhead fishing or recreating they take off running because they still fear man. Our Montana Grizzly bears are real dangerous because they have no fear of man. How many more people do we have to get mauled or killed before we start hunting them so they will start fearing man again. It is time to hunt the Montana Grizzly----it is just common sense!!!!	FWS-R6-ES-2016-0042-0121	
The more this species grows in habitat range the more conflict and issues we'll see. Also with less natural habitat as younger bears will be pushed out or killed by older bears due to lack of habitat. An ecosystem can only hold so many bears before we see a collapse of the system. We only have so much habitat that the Grizzly will never return to the number of black bears purely based on less habitat.	Factor A	I fully support delisting Grizzlies in the lower 48. A healthy manageable population needs to be maintained. Let science and common sense management provide for the best healthiest management over emotion and irrational fears. The more this species grows in habitat range the more conflict and issues we'll see. Also with less natural habitat as younger bears will be pushed out or killed by older bears due to lack of habitat. An ecosystem can only hold so many bears before we see a collapse of the system. We only have so much habitat that the Grizzly will never return to the number of black bears purely based on less habitat. Please delist and provide sound management so that they can thrive in the little remaining habitat left.	FWS-R6-ES-2016-0042-0157	

The Brown Bear currently occupies about 1% of their historic range prior to Europeans settling the United States. While there is available habitat suitable for Brown Bears that could be used to connect the few remaining populations in the lower 48 states, the current plan calls for flying or driving male brown bears to Yellowstone in order to mate and improve their genetic diversity.	Factor A	To Secretary of the Interior Mrs. Sally Jewell, I am writing to you about the issue of the U.S. Fish and Game Department's decision to remove the Yellowstone Grizzly Bear aka Brown Bear off the Federal Endangered Species Protection list. This is a complex issue as are the consequences of this amazing animal losing their endangered protection. The final answer as to why the Yellowstone Grizzly should not be removed is clearly because the species is not recovered. Instead of delisting, with all the time, money, and effort spent to bring back the bear from extinction, more money and time needs to be spent educating the growing human population on living in bear territory. Currently, the #1 cause of bear mortality still stems from conflicts with people. A secondary unforeseen problem that has reared its ugly head in recent years is the misinformation campaign of certain US agencies as well as one sided mainstream media stories. For example, government agencies and U.S. newspaper articles have claimed that the Yellowstone Bear population has increased and even doubled since the last time the US Fish and Game tried to remove the bear in 2006. In dissent of this opinion, a recent annual report compiled by Dr. David Mattson from the Interagency Grizzly Bear Study Team concludes that the Yellowstone Grizzly population has not only not grown since 2002, it has actually declined since 2007. This effort to misinform the public is both disturbing and problematic because the American people are not getting the truth. Let it be known that I wish to only focus on a few important points in this letter as opposed to the many reasons as to why delisting the Yellowstone Bear is the wrong move at this time. Female bears if healthy only have litters about every 3 years and do not reproduce easily. The Yellowstone Bear population has been isolated for over 100 years and some evidence suggests that the population is suffering from the effects of inbreeding. The Brown Bear currently occupies about 1% of their historic range prior to Europeans settling the United States. While there is available habitat suitable for Brown Bears that could be used to connect the few remaining populations in the lower 48 states, the current plan calls for flying or driving male brown bears to Yellowstone in order to mate and improve their genetic diversity. Again, this is a wrong-headed move unless given no other choice to sustain a healthy population. Currently, ranchers and farmers are compensated for the loss of domesticated animals by Yellowstone Bears. While some ranchers are working out their differences peaceably with grizzly bears, others are not. For that reason, federal oversight is still necessary. The issue of climate change as it relates to the loss of the bear's food sources must also be addressed. U.S. Fish and Wildlife Service has claimed that it's OK to delist the Grizzly now, even though it has lost 2 of their 4 major food sources because of climate change and invasive species. Warming temperatures are expected to remove the summer alpine haunts of one of the other remaining key foods: army cutworm moths. In the face of an unraveling ecosystem, bears have been turning to the dangerous practice of eating more meat. Unsustainable numbers of bears are being killed as result of conflicts with incautious big game hunters and ranchers. More needs to be done to reduce conflicts, not less. Lastly, another consequence of delisting the brown bear is that they will once again be hunted. State or commercial hunters have already removed the bear will population be hunted. Hunting the bear is exactly what I suppose the delisting of Grizzly Bears on the following grounds: - The population/gene pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstones population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the ecosystem is full or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. Population could be reduced to 600 bears (500 bears in Wyoming) before discretionary (hunting, management removals etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. Population will no longer be allowed to grow population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the states current management plan) i.e. Wyoming Range, southern Winds, Salt River Range TO CONCLUDE: - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources	FWS-R6-ES-2016-0042-0008	
The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor.	Factor A	I suppose the delisting of Grizzly Bears on the following grounds: - The population/gene pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstones population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the ecosystem is full or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. Population could be reduced to 600 bears (500 bears in Wyoming) before discretionary (hunting, management removals etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. Population will no longer be allowed to grow population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the states current management plan) i.e. Wyoming Range, southern Winds, Salt River Range TO CONCLUDE: - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources	FWS-R6-ES-2016-0042-0286	

The species deserves to live and reproduce in numbers adequate that they find others with whom to mate that are unrelated. In Montana, this means they need to travel north/south along the Bitterroot and Gallatin mountains toward the national forests in and around Glacier Nat'l Park.	Factor A	Docket FWS-R6-ES-2016-0042-0001 Hello-I want to see bears in the Greater Yellowstone Ecosystem, where I live. They deserve to be here, I don't. Don't let them be hunted or destroyed. They are smart as is proven by the research quoted on your website. I have bearily (pun intended!) seen 2 in the park, walking away or grazing, and minding their own business. This is as it should be. If these animals become de-listed, please make sure there is a strict short and long term plan created by each state where grizzlies are known to live or travel through. We don't want them to become hunters' targets. The species deserves to live and reproduce in numbers adequate that they find others with whom to mate that are unrelated. In Montana, this means they need to travel north/south along the Bitterroot and Gallatin mountains toward the national forests in and around Glacier Nat'l Park. Also, has anyone from USFWS consulted with the Canadians and what they are doing across the border to protect this keystone species? There are daily extinctions of species. Don't let this happen to this valued resource. Jerry Ladewig Emigrant, MT	FWS-R6-ES-2016-0042-0279	
Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions.	Factor A	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstones population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the ecosystem is full or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before discretionary (hunting, management removals etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the states current management plan) i.e. Wyoming Range, southern Winds, Salt River Range TO CONCLUDE: - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!) With the climate changing so fast (this is the warmest winter on record) and food sources	FWS-R6-ES-2016-0042-0286	

My conclusion that there is on biological evidence to support the belief that they should be delisted. Here's why:1) They need biological diversity. With hunting, they will be unable to reach other grizzly bear populations. 2) Some of their primary food sources are in decline due to global warming. This is an indisputable fact. 3) They have the lowest reproduction rate of any North American animal. If hunted, their numbers could be driven down past the point of recovery, because there is no reliable way to count them, especially by gender. Sows will be killed and cubs left to starve or be killed by predators or hunters. 4) They are an important factor in the Yellowstone ecosystem. To remove any of them would be a disservice!Additionally, grizzly bears bring thousands, if not millions, of people to Yellowstone each year. There is no reason why we can't live with the grizzly bears. People need to be responsible, so bears don't have to be killed or removed from the Greater Yellowstone Ecosystem. Over 50 were removed in 2015, mostly due to human negligence, even with protection. Without protection it would be a fiasco. Greed and the desire to mount a grizzly bear head on the wall is what I believe, is driving this decision to delist them. It has nothing to do with conservation. Turning the fate of the grizzly bear over to anti-carnivore states would be a disaster that could result in the demise of the grizzly bear. Many of these bears, especially sows with cubs have grown accustomed to humans and would be easy targets for hunters. Allowing hunting in areas close to Yellowstone and Grand Teton parks would be a complete disaster and some of the states are even talking about allowing that. Some hunters are already targeting particular bears as soon as they are delisted. Please withdraw your request to delist the grizzly bears. These bears are an important part of the ecosystem and are loved by people who come to visit the area We live in Montana and I know we can find a way to live with the grizzlies. We don't need to kill them.	Factor A	I have read numerous opinions on the subject of delisting the grizzly bears. My conclusion that there is on biological evidence to support the belief that they should be delisted. Here's why: 1) They need biological diversity. With hunting, they will be unable to reach other grizzly bear populations. 2) Some of their primary food sources are in decline due to global warming. This is an indisputable fact. 3) They have the lowest reproduction rate of any North American animal. If hunted, their numbers could be driven down past the point of recovery, because there is no reliable way to count them, especially by gender. Sows will be killed and cubs left to starve or be killed by predators or hunters. 4) They are an important factor in the Yellowstone ecosystem. To remove any of them would be a disservice! Additionally, grizzly bears bring thousands, if not millions, of people to Yellowstone each year. There is no reason why we can't live with the grizzly bears. People need to be responsible, so bears don't have to be killed or removed from the Greater Yellowstone Ecosystem. Over 50 were removed in 2015, mostly due to human negligence, even with protection. Without protection it would be a fiasco. Greed and the desire to mount a grizzly bear head on the wall is what I believe, is driving this decision to delist them. It has nothing to do with conservation. Turning the fate of the grizzly bear over to anti-carnivore states would be a disaster that could result in the demise of the grizzly bear. Many of these bears, especially sows with cubs have grown accustomed to humans and would be easy targets for hunters. Allowing hunting in areas close to Yellowstone and Grand Teton parks would be a complete disaster and some of the states are even talking about allowing that. Some hunters are already targeting particular bears as soon as they are delisted. Please withdraw your request to delist the grizzly bears. These bears are an important part of the ecosystem and are loved by people who come to visit the area We live in Montana and I know we can find a way to live with the grizzlies. We don't need to kill them.	FWS-R6-ES-2016-0042-0306		
Once a sustainable population exists, which based on numbers and comments from Wildlife Managers I believe it does, hunt them. Large predators needs to be hunted in general to make them fear humans, and many people enjoy hiking, fishing and spending time in Grizzly country. A hunted population should run from humans. When bears don't run, there is too much risk of human interaction, which leads to maulings.	Factor A	Use science based wildlife management. Once a sustainable population exists, which based on numbers and comments from Wildlife Managers I believe it does, hunt them. Large predators needs to be hunted in general to make them fear humans, and many people enjoy hiking, fishing and spending time in Grizzly country. A hunted population should run from humans. When bears don't run, there is too much risk of human interaction, which leads to maulings. In summary, trust the scientists to determine sustainable populations, not politicians or the public, and hunt them to keep sustainable populations in check and behaved.	FWS-R6-ES-2016-0042-0303		
Without federal protections, grizzlies would not be able to reach further vital food sources in Wyoming.	Factor A	I OPPOSE the delisting of Grizzly Bears on the following grounds: 1) The current populations are being managed for stability, not growth. There is no significant increase in grizzly populations. Reinstating any kind of hunt prematurely on this species risks a decline in numbers that most likely will exceed reproduction rates. 2) Questionable science as to "Carrying Capacity". Rather than reaching carrying capacity, the decline in primary food sources due to climate change, non native fish, and heavy pesticide use; are forcing bears to search further for their food including cutthroat trout, especially Whitebark Pine nuts and army cutworm moths. 3) Without federal protections, grizzlies would not be able to reach further vital food sources in Wyoming. 4) The Grizzly bear species are the slowest reproducing mammals in North America. Reproducing every 3 years and at best, will duplicate herself in a 10-year period 5) Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions. 6) The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray wolves) 7) Genetic Connectivity is vital to the long term survival of the species. The population/gene-pool is too isolated prohibiting genetic diversity within the species. For long term survival the grizzly needs protected corridors to reach other regions to expand the gene pool. 8) Even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. 9) It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. 10) The Yellowstone grizzly population faces enormous threats from increasing regional human populations, energy development, climate change, decline in food sources caused by climate change, habitat degradation caused by climate warming, problematic livestock husbandry practices, hostile state management, and unreliable methods for monitoring status and trends. 11) Compared to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of aggressive state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. 12) And, without doubt, colonization of new ranges will be the first casualty of state management. Populations will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range. I come to Yellowstone every year to view the wildlife. I don't understand with all the scientific evidence NOT TO DELIST, that you have to put a so called "management plan" in effect just to allow the grizzlies to be trophy hunted. Taking them off the Endangered Species Act has nothing to do with allowing the states to hunt and kill them to be made into rugs or head mounts.		FWS-R6-ES-2016-0042-0332	

The Yellowstone grizzly population faces enormous threats from increasing regional human populations, energy development, climate change, decline in food sources caused by climate change, habitat degradation caused by climate warming, problematic livestock husbandry practices, hostile state management, and unreliable methods for monitoring status and trends.	Factor A	I OPPOSE the delisting of Grizzly Bears on the following grounds: 1) The current populations are being managed for stability, not growth. There is no significant increase in grizzly populations. Reinstating any kind of hunt prematurely on this species risks a decline in numbers that most likely will exceed reproduction rates. 2) Questionable science as to "Carrying Capacity". Rather than reaching carrying capacity, the decline in primary food sources due to climate change, non native fish, and heavy pesticide use; are forcing bears to search further for their food including cutthroat trout, especially Whitebark Pine nuts and army cutworm moths. 3) Without federal protections, grizzlies would not be able to reach further vital food sources in Wyoming. 4) The Grizzly bear species are the slowest reproducing mammals in North America. Reproducing every 3 years and at best, will duplicate herself in a 10-year period 5) Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions. 6) The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray wolves) 7) Genetic Connectivity is vital to the long term survival of the species. The population/gene-pool is too isolated prohibiting genetic diversity within the species. For long term survival the grizzly needs protected corridors to reach other regions to expand the gene pool. 8) Even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. 9) It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. 10) The Yellowstone grizzly population faces enormous threats from increasing regional human populations, energy development, climate change, decline in food sources caused by climate change, habitat degradation caused by climate warming, problematic livestock husbandry practices, hostile state management, and unreliable methods for monitoring status and trends. 11) Compared to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of aggressive state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. 12) And, without doubt, colonization of new ranges will be the first casualty of state management. Populations will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range. I come to Yellowstone every year to view the wildlife. I don't understand with all the scientific evidence NOT TO DELIST, that you have to put a so called "management plan" in effect just to allow the grizzlies to be trophy hunted. Taking them off the Endangered Species Act has nothing to do with allowing the states to hunt and kill them to be made into rugs or head mounts.	FWS-R6-ES-2016-0042-0332	
Please do not delist the grizzlies. Their habitat has not been recovered to eliminate isolation pockets of bears. They still need all the help they can get to join the bears of the Glacier area. If the food sources are poor for just a couple of years the population easily suffers and less cubs will be born putting them right back in danger. Keep these beautiful creatures in the wild living without fear of hunters. They aren't ready for us to intervene!	Factor A	Please do not delist the grizzlies. Their habitat has not been recovered to eliminate isolation pockets of bears. They still need all the help they can get to join the bears of the Glacier area. If the food sources are poor for just a couple of years the population easily suffers and less cubs will be born putting them right back in danger. Keep these beautiful creatures in the wild living without fear of hunters. They aren't ready for us to intervene!	FWS-R6-ES-2016-0042-0382	
Please do not de-list these animals at a federal level. Their numbers may be increasing slightly, but de-listing them will lead to them being the responsibility of individual states - which ALWAYS seems to result in species being increasingly hunted, and their numbers then decline. Protect them at the highest level and as well as protecting a sentient species, and keeping an ecological balance. you will reap economic rewards from wildlife tourism, (something which does not exist in many other countries).	Factor A	Please do not de-list these animals at a federal level. Their numbers may be increasing slightly, but de-listing them will lead to them being the responsibility of individual states - which ALWAYS seems to result in species being increasingly hunted, and their numbers then decline. Protect them at the highest level and as well as protecting a sentient species, and keeping an ecological balance. you will reap economic rewards from wildlife tourism, (something which does not exist in many other countries).	FWS-R6-ES-2016-0042-0411	
The park grizzlies have a narrow gene pool within the park, to avoid inbreeding they must travel, as grizzlies do, to other areas for their own genetic diversity, such as to the Tetons. With protections they have been able to do this, without protection and the additional threat of the trophy hunts, they will be reduced to their own gene pool within the park. The species needs the connectivity to provide genetic diversity within the species in order for long term survival. This is an absolute necessity. And, without doubt, colonization of new ranges will be the first casualty of state management. Populations will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range	Factor A	Please don't delist the Grizzlies. The park grizzlies have a narrow gene pool within the park, to avoid inbreeding they must travel, as grizzlies do, to other areas for their own genetic diversity, such as to the Tetons. With protections they have been able to do this, without protection and the additional threat of the trophy hunts, they will be reduced to their own gene pool within the park. The species needs the connectivity to provide genetic diversity within the species in order for long term survival. This is an absolute necessity. And, without doubt, colonization of new ranges will be the first casualty of state management. Populations will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range .	FWS-R6-ES-2016-0042-0431	

I am writing to OPPOSE the delisting of the grizzly bears of the Greater Yellowstone ecosystem. While I am pleased that grizzly numbers have reached a threshold that they are safer from extinction, we have learned all too well that delisting is "code" for "now we can hunt them for fun".The managed hunting of deer, elk and other prey animals is appropriate and within the context of natural ecosystems. The hunting of carnivores, especially apex carnivores like the grizzly bear is not. It is aberrant, and inappropriate and damages wild places.FWS data on Grizzlies do not show increasing populations, they have only just maintained their numbers for the past 15 years. Declining food sources (white pine bark tree nuts, cutthroat trout, army cutworm moths) result in bears travelling outside the safety of the park, where they would be hunted. These declining food sources also may threaten the recovery of the bears.We are still at a time in Grizzly recovery where every bear is important. There are still too many concerns about their future well being to delist them.	Factor A	I am writing to OPPOSE the delisting of the grizzly bears of the Greater Yellowstone ecosystem. While I am pleased that grizzly numbers have reached a threshold that they are safer from extinction, we have learned all too well that delisting is "code" for "now we can hunt them for fun". The managed hunting of deer, elk and other prey animals is appropriate and within the context of natural ecosystems. The hunting of carnivores, especially apex carnivores like the grizzly bear is not. It is aberrant, and inappropriate and damages wild places. FWS data on Grizzlies do not show increasing populations, they have only just maintained their numbers for the past 15 years. Declining food sources (white pine bark tree nuts, cutthroat trout, army cutworm moths) result in bears travelling outside the safety of the park, where they would be hunted. These declining food sources also may threaten the recovery of the bears. We are still at a time in Grizzly recovery where every bear is important. There are still too many concerns about their future well being to delist them.	FWS-R6-ES-2016-0042-0426	
The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. A	Factor A	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear. No one	FWS-R6-ES-2016-0042-0452	
While their numbers have been slowly increasing, they are not yet a stable population. Being, in effect, cut off from bears in other management and refuge areas by not having protected wildlife corridors between these places, you limit the genetic pool, which contribute to their decline.	Factor A	I am against the delisting of the Grizzlies. As a top tier predator, their presence is necessary to keeping their environment in check. While their numbers have been slowly increasing, they are not yet a stable population. Being, in effect, cut off from bears in other management and refuge areas by not having protected wildlife corridors between these places, you limit the genetic pool, which contribute to their decline. Instead of delisting, we need to not only protect the bears, but people who live in bear country need to learn to coexist with the bears and protected wildlife corridors need to be designated allowing bears to roam safely between the parks, refuges, and reserves. As for making profits from bears, photo safari's tend to make more money than trophy hunting because they can be taken almost all year round, and it doesn't end in death for the animals. Despite "training" and rules against killing female bears with cubs, it still happens because the females may leave their cubs in a tree to go forage for themselves. I have yet to get to visit the Yellowstone area, but I pray that when I do make it there, that the grizzly will be there and thriving.	FWS-R6-ES-2016-0042-0441	

The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so.	Factor A	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear. No one	FWS-R6-ES-2016-0042-0452	
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In fact, the bear seems to be in decline from stable growth, due to food source depletion and habitat deterioration, human interaction mortality, both accidental and illegal, and scarcity of cub success due to the above human and environmental interactions.	Factor A	I have reviewed information concerning the delisting of Yellowstone's grizzly bears, and have reached the conclusion that there is not proof that the population of bears has grown to stable numbers. In fact, the bear seems to be in decline from stable growth, due to food source depletion and habitat deterioration, human interaction mortality, both accidental and illegal, and scarcity of cub success due to the above human and environmental interactions. The USFWS own recovery plan does not demonstrate that the YEP of Grizzly bears is stable and has reached a point that release from the ESA is warranted. Release of the bears from protection would undoubtedly cause very high trophy hunting mortality in the surrounding states of Wyoming, Idaho, and Montana, as YEP bears forage in wider ranges, not knowing park protection boundaries. Please do not remove grizzly bears from the federal list of endangered species. I am not a young tree hugger, but a grandfather, life NRA member, and an environmental hunter. I want my great-grandchildren to be able to see grizzly's in the wild.	FWS-R6-ES-2016-0042-0460	
Grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary.	Factor A	I completely OPPOSE delisting Yellowstone Grizzlies There is a irrational cultural hostility toward grizzlies in Wyoming, a state where public officials want to suppress recovery, even preventing bears from inhabiting remote federal public lands in the Yellowstone region because priority is given to non-native, taxpayer-subsidized private cattle. Grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary.	FWS-R6-ES-2016-0042-5032	

Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species.	Factor A	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife, primarily grizzlies and wolves. Allowing a "trophy" hunt, targeting the park grizzlies is not only an easy hunt, but not a hunt at all, no less an ambush of the species. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, even resistant to managing a species of high importance to the non-hunting public and/or the federal government (i.e. - Gray wolves). In addition, even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under	FWS-R6-ES-2016-0042-0463	
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Several environmental changes are also having harsh impacts on the bears food supplies which will undoubtedly add extra pressures on the population.	Factor A	I strongly oppose the de-listing of the grizzly bear from Federal protections. While the recovery of the grizzly is a great success story there are several factors that make this recovery potentially unstable. This year alone there was 62 grizzly deaths with the vast majority being human related. That is close to 7% of the population that they claim lives in the greater Yellowstone area. Out of those deaths where information is provided 15 were listed as females. Bears reproduce at extremely slow rates with female bears reaching sexual maturity around 7 years old. This means the loss of female bears and often times their cubs can dramatically impact the future of the population moving forward. Several environmental changes are also having harsh impacts on the bears food supplies which will undoubtedly add extra pressures on the population. Grizzlies are the last of the great apex predators living in the lower 48 and we all should do what we can to preserve their legacy.	FWS-R6-ES-2016-0042-0485	
FWS claim: The shortage of cutthroat trout and white bark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. Å The reality: Not so, says Sylvia Fallon. x She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Å	Factor A	The U.S. Fish and Wildlife Service (FWS) wants to strip Endangered Species Act protection from the Greater Yellowstone Ecosystem grizzly bear. We have only until May 10 to comment on the FWS proposal. FWS claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattsonf, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claim: The shortage of cutthroat trout and white bark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. FWS claim: Their agency will stay involved with protecting the grizzly population after delisting. The reality: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. FWS claim: The agency will monitor grizzly	FWS-R6-ES-2016-0042-5043	

The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. A	Factor A	The U.S. Fish and Wildlife Service (FWS) wants to strip Endangered Species Act protection from the Greater Yellowstone Ecosystem grizzly bear. We have only until May 10 to comment on the FWS proposal. FWS claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claim: The shortage of cutthroat trout and white bark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. FWS claim: Their agency will stay involved with protecting the grizzly population after delisting. The reality: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the national push for delisting. FWS claim: The agency will monitor grizzly	FWS-R6-ES-2016-0042-5043	
Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources.	Factor A	As a wildlife biologist and a very frequent visitor to the national park system, especially of Yellowstone, Grand teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife, primarily grizzlies and wolves. Allowing a "trophy" hunt, targeting the park grizzlies is not only an easy hunt, but not a hunt at all, no less an ambush of the species. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, even resistant to managing a species of high importance to the non-hunting public and/or the federal government (i.e. - Gray wolves). In addition, even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under	FWS-R6-ES-2016-0042-0463	

3- GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected.4- DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes.	Factor A	Please consider the following as valid reasons NOT to remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. 1- EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. 2- DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. 3- GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected. 4- DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. 5- THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Please consider these issues closely before making a final decision. My hope is that the Grizzlies remain on the ESA for many years to come, as this is not the time to delist. But, if the final decision is to delist, I would certainly hope you would consider expanding the boundaries of protection for the Grizzlies around the GYE 20-50 miles. These Grizzlies do wander outside of the park boundaries in search of food and for hibernation, which would subject them to being hunted.	FWS-R6-ES-2016-0042-5055	
Grizzly bear food sources (including the whitebark pine) are collapsing and mortality rates are already increasing.	Factor A	Please do not delist Grizzly Bears. Now is not the time to take away protections for this at-risk native species. In a time when climate change and habitat loss are challenging all wildlife to adapt and survive, the only reasonable and responsible action will be to rule that Grizzly Bears should not be delisted at this time. Grizzly bear food sources (including the whitebark pine) are collapsing and mortality rates are already increasing. Yellowstone Grizzly bears are experiencing a high level of conflict with humans and delisting would mean that any hungry bear who steps outside Yellowstone National Park will be killed by waiting hunters. Bears do not recognize park boundaries and bears just need to eat. The Greater Yellowstone Ecosystem is their home, and that includes the park and areas outside its boundaries. It is a fact that a prime motivation for the states of Idaho, Montana and Wyoming in pushing for delisting of Grizzly bears is trophy hunting and the perceived economic gain this 'sport' will bring. While the USFWS estimates there are more than 700 grizzlies in the Greater Yellowstone Ecosystem, no one really knows how many bears there are and this number could well be an over-estimation of true populations. Until it is known exactly how many grizzly bears exist in the Greater Yellowstone Ecosystem, it would be irresponsible to delist them and allow the states to open up their trophy hunt programs. Sport hunting is unnecessary for managing a stable bear population. At minimum, there should be a delay in the onset of hunting until Idaho, Montana and Wyoming have demonstrated their commitment to a responsible management plan and maintaining a stable population, particularly given the record high number (59) of bears killed in 2015. The leading cause of bear mortality is conflicts with humans. In remembrance of Scarface, the 25-year old Grizzly bear who was a park visitor favorite, and the first Grizzly bear I ever saw. Yet he was recently killed by a hunter outside park boundaries when he wandered, likely in search of food. A park icon gone, because he didn't read the park boundary signs and someone was waiting to kill him. This is what will happen to many more Grizzly bears if they are delisted now. Please do not delist Grizzly bears at this time. They must remain protected until Idaho, Montana and Wyoming have reasonable and science-based management plans in place, plans that do not consist of trophy hunting. Thank you for your consideration.	FWS-R6-ES-2016-0042-5074	

Yellowstone Grizzly bears are experiencing a high level of conflict with humans and delisting would mean that any hungry bear who steps outside Yellowstone National Park will be killed by waiting hunters. Bears do not recognize park boundaries and bears just need to eat.	Factor A	Please do not delist Grizzly Bears. Now is not the time to take away protections for this at-risk native species. In a time when climate change and habitat loss are challenging all wildlife to adapt and survive, the only reasonable and responsible action will be to rule that Grizzly Bears should not be delisted at this time. Grizzly bear food sources (including the whitebark pine) are collapsing and mortality rates are already increasing. Yellowstone Grizzly bears are experiencing a high level of conflict with humans and delisting would mean that any hungry bear who steps outside Yellowstone National Park will be killed by waiting hunters. Bears do not recognize park boundaries and bears just need to eat. The Greater Yellowstone Ecosystem is their home, and that includes the park and areas outside its boundaries. It is a fact that a prime motivation for the states of Idaho, Montana and Wyoming in pushing for delisting of Grizzly bears is trophy hunting and the perceived economic gain this 'sport' will bring. While the USFWS estimates there are more than 700 grizzlies in the Greater Yellowstone Ecosystem, no one really knows how many bears there are and this number could well be an over-estimation of true populations. Until it is known exactly how many grizzly bears exist in the Greater Yellowstone Ecosystem, it would be irresponsible to delist them and allow the states to open up their trophy hunt programs. Sport hunting is unnecessary for managing a stable bear population. At minimum, there should be a delay in the onset of hunting until Idaho, Montana and Wyoming have demonstrated their commitment to a responsible management plan and maintaining a stable population, particularly given the record high number (59) of bears killed in 2015. The leading cause of bear mortality is conflicts with humans. In remembrance of Scarface, the 25-year old Grizzly bear who was a park visitor favorite, and the first Grizzly bear I ever saw. Yet he was recently killed by a hunter outside park boundaries when he wandered, likely in search of food. A park icon gone, because he didn't read the park boundary signs and someone was waiting to kill him. This is what will happen to many more Grizzly bears if they are delisted now. Please do not delist Grizzly bears at this time. They must remain protected until Idaho, Montana and Wyoming have reasonable and science-based management plans in place, plans that do not consist of trophy hunting. Thank you for your consideration.	FWS-R6-ES-2016-0042-5074	
Grizzly bears are not recovered across their historic range.	Factor A	The USFWS is pushing to delist the Yellowstone grizzly bears. It's obvious why they're doing this. Trophy hunters are itching for a grizzly bear hunt to satisfy their blood lust and ego's and the USFWS is perfectly happy to make their dreams come true. Please don't allow this to happen. They're not just after grizzlies in the Yellowstone ecosystem but Montana is already pushing for the delisting of all grizzly bears, specifically the great bear population in Northwest Montana. Please take a moment and speak out for this iconic species. They are voiceless, we must speak for them! Follow the link to the USFWS comment page and stand up for the grizzly bear. Points to make: 1. Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population. 2. Grizzly bears are not recovered across their historic range. 3. Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399, would be threatened by the delisting. === The Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife	FWS-R6-ES-2016-0042-5087	

During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably are dead. This totals over 90 bears, or more than 12% of the population.	Factor A	We are adamantly against delisting the Greater Yellowstone Grizzly Bears from the Endangered and an Threatened Wildlife Species Act. An example as to why delisting of protected wildlife can be detrimental to a species has occurred with State management of the wolf population in Wyoming, Montana, and Idaho. Contest killings in both Montana and Idaho have occurred, which reflect the hatred that people have for "predator" species, and have been ignored by the States' FWS. The only certain outcome of delisting the Yellowstone grizzly bears is that it will result in trophy hunting. With delisting, the federal government will turn over grizzly management decisions outside of the park's boundaries to three states that will show no restraint in killing grizzlies. (Peacock, 2016) The Service has fiercely maintained that even if problems arise [under state management], it will not relist the population. Despite some laudatory language about co-existence with grizzly bears, the state grizzly bear management plans lack any binding commitments to do anything other than hunt bears. (Willcox, 2016) The growth of the grizzly population has leveled off; the current population estimate is down six percent from 2014. Mortality from all causes, as reported by the government, was 59 grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the bears that will be shot in the trophy hunt and you could easily approach 200 dead grizzlies in a single year. Even a population of 700 grizzly bears would be doomed to extinction by such heavy mortality. (Peacock, 2016) Even though the states may be somewhat cautious during the first five years of federal oversight that follows delisting, there is every reason to believe that, over time, state management will reverse the gains made over the last 40 years of endangered species protections. This is especially likely given the crisis that Yellowstone grizzly bears are facing now. During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably are dead. This totals over 90 bears, or more than 12% of the population. The primary factor affecting grizzly bears at both the individual and population level is excessive human-caused mortality. Regulating human-caused mortality through habitat management is an effective approach, as evidenced by increasing grizzly bear populations in the lower 48 States where motorized access standards exist (e.g., GYE and Northern Continental Divide Ecosystem). This requires ongoing monitoring of the grizzly bear population to understand if it is sufficiently resilient to allow for a conservative level of human-caused mortality without causing population decline. We must allow adequate protections for these magnificent animals, so they are not another species destroyed by humans and management policies that are centered around a financial gain and political pressure.	FWS-R6-ES-2016-0042-5103	
There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc.	Factor A	THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain listed. Thank you	FWS-R6-ES-2016-0042-5148	

The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001).USFWS's proposal also does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat.Due to all of these unknowns regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population, I believe the better suited and pragmatic approach of waiting five years to see how the population is responding to these threats should be taken instead.	Factor A	Grizzlies in the GYE are facing catastrophic losses to several of their key food sources, such as whitebark pine and cutthroat trout. The service's recent research on whitebark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy whitebark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals. Moreover, grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary. Furthermore, the USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. Additionally, the USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). USFWS's proposal also does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. Due to all of these unknowns regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population, I believe the better suited and pragmatic approach of waiting five years to see how the population is responding to these threats should be taken instead.	FWS-R6-ES-2016-0042-5093	
Regarding the issue of whitebark pine nuts, as part of the grizzly bear diet, I site the Food Synthesis Report (IGBST 2013). Grizzly Bears are extremely omnivorous and display great diet plasticity, shifting and switching food habits according to their availability. There are over 260 species of foods consumed by grizzly bears in the GYE. This ability to eat a wide variety of foods makes them a generalist species. After years of studies, new feeding strategies have continued to appear annually. While whitebark pine seed has been identified as one of the components of a grizzly bear's diet, which can indeed influence reproductive and survival rates. However, it has been revealed through study that there is no correlation between long term survival with a decline in whitebark pine availability. The report found that grizzly bear selection of white bark pine nuts had actually decreased between 2000 and 2011. Movement rates had not changed, as well as body size and condition during times of decreased availability of the nut. There continued to be a consistent litter size following poor white bark pine years. Nearly one third of grizzly bear home ranges in the GYE do not contain any whitebark pine. Grizzly bears have shown themselves to be very resilient and adaptable!	Factor A	I support delisting the GYE population of grizzly bears from the Federal List of Endangered and Threatened Wildlife. After a review of document FWS-R6-ES-2016-0042, Proposed Rule; Endangered and Threatened Species, Exports, Imports, Reporting and Recordkeeping Requirements, Transportation, I am convinced we can confidently move ahead with the de-listing. This document thoroughly discusses the history of the grizzly bear species, it's habitat, nutritional needs, and challenges to it's continued survival. It reviews the history of the recovery process and sites volumes of reports and analysis, by experts in the field, of the ongoing status of the grizzly. Recovery criteria were established and indeed met and maintained since 2004. As science has evolved and improved, so has our understanding of the important aspects of grizzly management. Also, based on the best scientific and commercial data available it is clear that the GYE grizzly bear population is discrete from other grizzly bear populations and significant to the remainder of the taxon and meets the definition of a DPS under the act. Regarding the issue of whitebark pine nuts, as part of the grizzly bear diet, I site the Food Synthesis Report (IGBST 2013). Grizzly Bears are extremely omnivorous and display great diet plasticity, shifting and switching food habits according to their availability. There are over 260 species of foods consumed by grizzly bears in the GYE. This ability to eat a wide variety of foods makes them a generalist species. After years of studies, new feeding strategies have continued to appear annually. While whitebark pine seed has been identified as one of the components of a grizzly bear's diet, which can indeed influence reproductive and survival rates. However, it has been revealed through study that there is no correlation between long term survival with a decline in whitebark pine availability. The report found that grizzly bear selection of white bark pine nuts had actually decreased between 2000 and 2011. Movement rates had not changed, as well as body size and condition during times of decreased availability of the nut. There continued to be a consistent litter size following poor white bark pine years. Nearly one third of grizzly bear home ranges in the GYE do not contain any whitebark pine. Grizzly bears have shown themselves to be very resilient and adaptable! Over the years, grizzly bear recovery has been developed, revised and modified according to new scientific studies, data and methods. The grizzly bear recovery story is truly one of success, that represents the hard work of many people, using the best science available. This will not end with the de-listing! In this proposed rule, if finalized, there is ongoing biological review of the status of the grizzly bears and detailed rules and parameters allowing for emergency re-listing if necessary. The 2016 Conservation Strategy identifies and provides an ongoing framework for managing habitat and demographic parameters. A very detailed plan is put forth in this document for implementation and funding. Furthermore this document examines the five different factors that threaten a species and, given the rigorous scientific monitoring protocols established for the GYE grizzly bear population, we can expect to fully protect them in the future.	FWS-R6-ES-2016-0042-5171	

I oppose this because based on the scientific data I have reviewed. Specifically, in Yellowstone Ecosystem, there are several critical issues that adversely affect the availability of food sources upon which the grizzly bear relies. These uncertainties are primarily the result of ongoing climate change in the ecosystem.	Factor A	I am writing to express my opposition to the delisting of the grizzly bear from protection under the the Endangered Species Act. I oppose this because based on the scientific data I have reviewed. Specifically, in Yellowstone Ecosystem, there are several critical issues that adversely affect the availability of food sources upon which the grizzly bear relies. These uncertainties are primarily the result of ongoing climate change in the ecosystem. I am currently associated with Montana State University where I study ecosystem responses to climate. There is no certainty that the food sources currently available to the grizzly will continue to be available in the near future. In fact, it is highly likely that the food sources currently available to the grizzly will decline over the very near future. Further, there is an ever-increasing threat to the bear's habitat where development is encroaching into wild places causing conflict between bears and humans. For example, when bears are unable to access the food sources that have become scarce, specifically white bark pine nuts in fall, during the hunting season, we have seen a notable increase in bear/human conflicts. Should bears be removed from the ESA, they will be vulnerable as they feed on the army cutworm moth in late summer making large numbers of them. I find the proposal to designate the bears of the GYE as a distinct population segment to be arbitrary and capricious. The GYE population will most certainly decline as their genetic diversity stagnates. It is irresponsible not to encourage continuity between the bears of the GYE and those of the Northern Continental Divide population and Cabinet Yak populations. The problem remains that there is not a population of grizzlies in the Central Idaho Wilderness. In addition to my academic career, I own a small tour business in Gardiner, Montana, Wild Bear Adventures. One of the facts that our clients always find interesting is that the grizzly bear is the slowest reproducing mammal in North America. When there are conflicts between humans and bears and a female bear is removed from the ecosystem, her future reproductive potential is an exponential loss. Further, the success of my business relies on a healthy bear population, one that has not been impacted by hunting which, as the data show is the case with wolves, they are comfortable occupying all of their habitat, increasing the chances of being viewed by visitors and increasing our opportunity to share information with the public. Therefore, for these and many other reasons too numerous for me to mention here, do not remove the grizzly bear from protection under the Endangered Species Act.	FWS-R6-ES-2016-0042-5217	
Also very familiar with the on-going development in and around Yellowstone, which shows no signs of slowing, let alone reversing the trend of putting ever more humans into the remnants of grizzly habitat and the predictable unfortunate outcome of bear-human interactions, which almost always end in grizzly mortality.	Factor A	I want to go on record as strongly OPPOSING delisting for GYA grizzly bears from Endangered Species Act protections. As a 46-year resident of Montana I am very familiar with the Greater Yellowstone Area, its fish and wildlife. Also very familiar with the on-going development in and around Yellowstone, which shows no signs of slowing, let alone reversing the trend of putting ever more humans into the remnants of grizzly habitat and the predictable unfortunate outcome of bear-human interactions, which almost always end in grizzly mortality. I have personally backpacked into and camped out in every wilderness area in Montana, including into the Bob Marshall's famous Chinese Wall, all through Glacier as well as significant time in Yellowstone's backcountry. Truth is, I've seen exactly ONE grizzly bear during all those decades in the wild -- and that was in Glacier National Park. We do not hike with bear bells or other noise-makers on, so I'm quite sure we didn't "spook" any bears away on the hundreds of miles of trails hiked. I also skied across the entire length of both the Anaconda-Pintlar Wilderness (1983) and the Tobacco Root range (1997) and, despite it being early spring when the bears should have been coming out of hibernation, saw not one bear. Consequently, I'm finding it a little hard to believe we now have a "recovered" grizzly population in the Greater Yellowstone area -- or Montana, for that matter. The grizzlies in the Cabinet-Yaak area have been struggling for decades, despite "recovery" attempts and are primarily impacted by habitat loss due to logging and development, with the primary problem being human-caused mortality. It's worth considering the Cabinet-Yaak example because there is currently political pressure to increase logging throughout Montana, including in the GYA (Hebgen Lake area, specifically). Moreover, climate change has already severely impacted traditional food sources for GYA bears with the massive die off of white bark pines. Add to that the illegal introduction of lake trout into Y-stone Lake and the subsequent reduction in historic cutthroat trout spawning runs and the future food supplies for grizzlies in the GYA will probably lead to even more conflicts since both cattle and sheep graze public and private lands in the GYA -- and the Forest Service shows no signs of significantly reducing livestock grazing to protect grizzlies. Likewise, climate change is driving wildfires due to lower snowpack, shorter, warmer winters, earlier springs, drought, and much higher summer temperatures. While the wildfires do not "destroy" forests as some claim, they certainly do affect grizzly habitat. Given the incredibly small "secure zones" for grizzlies, losing the forest cover in those areas to wildfire forces grizzlies into other areas and, again, more conflict with humans and livestock. Put it all together -- along with the predictions for increasing, not decreasing, temperatures -- and it should be obvious that grizzly bears do not have a smooth ride into the future. Toss in the already proposed hunting seasons in WY, MT and ID -- and the certainty that more bears will be killed if delisted -- and the conclusion should be inescapable that it is not yet the time to remove grizzlies from Endangered Species Act protections. Thanks for the opportunity to comment and I hope you're listening to the public on this issue. It doesn't take long to go back through the comments online to see that virtually all of them are against delisting at this time. As someone who actually lives in Montana and knows its wilderness, wildlife and fish very well, I can only hope that you'll take my	FWS-R6-ES-2016-0042-5223	

There is no certainty that the food sources currently available to the grizzly will continue to be available in the near future. In fact, it is highly likely that the food sources currently available to the grizzly will decline over the very near future. Further, there is an ever-increasing threat to the bear's habitat where development is encroaching into wild places causing conflict between bears and humans. For example, when bears are unable to access the food sources that have become scarce, specifically white bark pine nuts in fall, during the hunting season, we have seen a notable increase in bear/human conflicts. Should bears be removed from the ESA, they will be vulnerable as they feed on the army cutworm moth in late summer making large numbers of them.	Factor A	I am writing to express my opposition to the delisting of the grizzly bear from protection under the the Endangered Species Act. I oppose this because based on the scientific data I have reviewed. Specifically, in Yellowstone Ecosystem, there are several critical issues that adversely affect the availability of food sources upon which the grizzly bear relies. These uncertainties are primarily the result of ongoing climate change in the ecosystem. I am currently associated with Montana State University where I study ecosystem responses to climate. There is no certainty that the food sources currently available to the grizzly will continue to be available in the near future. In fact, it is highly likely that the food sources currently available to the grizzly will decline over the very near future. Further, there is an ever-increasing threat to the bear's habitat where development is encroaching into wild places causing conflict between bears and humans. For example, when bears are unable to access the food sources that have become scarce, specifically white bark pine nuts in fall, during the hunting season, we have seen a notable increase in bear/human conflicts. Should bears be removed from the ESA, they will be vulnerable as they feed on the army cutworm moth in late summer making large numbers of them. I find the proposal to designate the bears of the GYE as a distinct population segment to be arbitrary and capricious. The GYE population will most certainly decline as their genetic diversity stagnates. It is irresponsible not to encourage continuity between the bears of the GYE and those of the Northern Continental Divide population and Cabinet Yak populations. The problem remains that there is not a population of grizzlies in the Central Idaho Wilderness. In addition to my academic career, I own a small tour business in Gardiner, Montana, Wild Bear Adventures. One of the facts that our clients always find interesting is that the grizzly bear is the slowest reproducing mammal in North America. When there are conflicts between humans and bears and a female bear is removed from the ecosystem, her future reproductive potential is an exponential loss. Further, the success of my business relies on a healthy bear population, one that has not been impacted by hunting which, as the data show is the case with wolves, they are comfortable occupying all of their habitat, increasing the chances of being viewed by visitors and increasing our opportunity to share information with the public. Therefore, for these and many other reasons too numerous for me to mention here, do not remove the grizzly bear from protection under the Endangered Species Act.	FWS-R6-ES-2016-0042-5217	
The number one threat to the GYE is climate change. We are currently experiencing an extinction rate 1000x greater than anything on the paleontological record, and it is our fault. Water availability affecting flora and fauna, foods for grizzlies, will be affected. Plants will be migrating up, or north and bears may not be able to follow them. A precarious population with an extremely low growth rate will not fare well under any circumstances, let alone one without utmost protection. Their threatened critical food sources (trout, whitebark pines) that are supposedly being replaced with other sources do not take into account the difference in caloric value, quality of food, seasonal needs, and availability without human interference. There are temporal, spatial, caloric and risk factors that aren't being addressed in the proposal. The "adaptable bear" argument is moot.	Factor A	I have spend a significant amount of time in Yellowstone from 1995 to present. I have a deep love for the Greater Yellowstone Ecosystem and want my children to be able to grow up and see this land as I have come to know it -- a large are a of relatively undisturbed habitat. Removing Grizzly Bears will drastically change the dynamics of the ecosystem. We are going to see a decrease in bears WITHOUT hunting, due to development and an increase in the human population in the Greater Yellowstone Ecosystem (GYE), especially after delisting when so much of their habitat will be opened to fracking, natural gas development, mining and trophy homes. By the time we need to re-list, which will most certainly happen due to a variety of reasons below, we will have lost critical habitat and many other species under the grizzly umbrella. Having lived in the GYE for the past 20 years, learning and teaching about this ecosystem, I promise you, this will have major effects. The number one threat to the GYE is climate change. We are currently experiencing an extinction rate 1000x greater than anything on the paleontological record, and it is our fault. Water availability affecting flora and fauna, foods for grizzlies, will be affected. Plants will be migrating up, or north and bears may not be able to follow them. A precarious population with an extremely low growth rate will not fare well under any circumstances, let alone one without utmost protection. Their threatened critical food sources (trout, whitebark pines) that are supposedly being replaced with other sources do not take into account the difference in caloric value, quality of food, seasonal needs, and availability without human interference. There are temporal, spatial, caloric and risk factors that aren't being addressed in the proposal. The "adaptable bear" argument is moot. US FWS must submit their population data for proper peer review (the Interagency Grizzly Bear Study Team doesn't count.) There may well be 700 bears, but it is suspect that the number nearly doubled in 2007 when delisting was on the table. It is suspect that for many yrs the population was 260-600, then all of a sudden it was a solid 700. The methods involve a lot of extrapolation from very few verifiable sightings and that should make us nervous. An independent, unbiased, qualified source can be trusted with the geographic data the IGBST is reticent to release. The fact that the Northern Continental Divide Ecosystem bears are not on the chopping block is odd. There are more bears in that population, yet ours are threatened with less protection. The incredible pressure on this land for development of second (and third) homes, fracking, mining and general development is astonishing, and powerful enough to convince public officials we should throw caution to the wind and see how it goes. There was a 6% decrease in the past 2 years and at least 59 known dead last year (likely higher). This is a trend for the past few years. Actual numbers will rise and fall, but there is not an overall growth trend. Grizzly protection also shelters my sanity. To live and hike in griz country moves me to an equilibrium that's hard to find in an ever more deafening society, and it is irreplaceable. Being face to face with a grizzly leaves with my cells on fire, and a passion for life you cannot buy. Having a daughter later in life is directly tied to me raising her in a place where wilderness reigns.	FWS-R6-ES-2016-0042-5209	

De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected.	Factor A	Greetings, I wish to offer the following comment regarding the intended rule change to remove the Greater Yellowstone Ecosystem population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I am against this proposed de-listing. De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. The theory that bears can adapt to development and the resulting changes in food sources is not supported by the evidence. Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, seasonable resilience, and availability throughout the habitat. The GYE grizzlies are an "island population". This means that they are adapted to live and thrive within a specific geographic range. Substantial threats or changes to that habitat would likely pressure the bears to try and relocate, but they cannot successfully do so. The Greater Yellowstone Ecosystem is the environment to which they have adapted over eons. There is not another environment to which they could relocate and remain a viable species. Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability. If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it. Please do not de-list this special population of bear.	FWS-R6-ES-2016-0042-5241	
One of the facts that our clients always find interesting is that the grizzly bear is the slowest reproducing mammal in North America. When there are conflicts between humans and bears and a female bear is removed from the ecosystem, her future reproductive potential is an exponential loss.	Factor A	I am writing to express my opposition to the delisting of the grizzly bear from protection under the the Endangered Species Act. I oppose this because based on the scientific data I have reviewed. Specifically, in Yellowstone Ecosystem, there are several critical issues that adversely affect the availability of food sources upon which the grizzly bear relies. These uncertainties are primarily the result of ongoing climate change in the ecosystem. I am currently associated with Montana State University where I study ecosystem responses to climate. There is no certainty that the food sources currently available to the grizzly will continue to be available in the near future. In fact, it is highly likely that the food sources currently available to the grizzly will decline over the very near future. Further, there is an ever-increasing threat to the bear's habitat where development is encroaching into wild places causing conflict between bears and humans. For example, when bears are unable to access the food sources that have become scarce, specifically white bark pine nuts in fall, during the hunting season, we have seen a notable increase in bear/human conflicts. Should bears be removed from the ESA, they will be vulnerable as they feed on the army cutworm moth in late summer making large numbers of them. I find the proposal to designate the bears of the GYE as a distinct population segment to be arbitrary and capricious. The GYE population will most certainly decline as their genetic diversity stagnates. It is irresponsible not to encourage continuity between the bears of the GYE and those of the Northern Continental Divide population and Cabinet Yak populations. The problem remains that there is not a population of grizzlies in the Central Idaho Wilderness. In addition to my academic career, I own a small tour business in Gardiner, Montana, Wild Bear Adventures. One of the facts that our clients always find interesting is that the grizzly bear is the slowest reproducing mammal in North America. When there are conflicts between humans and bears and a female bear is removed from the ecosystem, her future reproductive potential is an exponential loss. Further, the success of my business relies on a healthy bear population, one that has not been impacted by hunting which, as the data show is the case with wolves, they are comfortable occupying all of their habitat, increasing the chances of being viewed by visitors and increasing our opportunity to share information with the public. Therefore, for these and many other reasons too numerous for me to mention here, do not remove the grizzly bear from protection under the Endangered Species Act.	FWS-R6-ES-2016-0042-5217	
The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so.	Factor A	The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population. Research has also shown threshold population effects, which could mean that by the time the problem is detected, it is too late to fix the problem. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Indeed, at the recent announcement of the delisting proposal, Senator Larry Craig used the opportunity to call for weakening the Endangered Species Act. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources. The delisting plan lacks binding motorized access management standards to protect habitat. The 1993 Grizzly Bear Recovery Plan and scientific research have demonstrated that roads kill bears.	FWS-R6-ES-2016-0042-5224	

#NAME?	Factor A	#NAME?	FWS-R6-ES-2016-0042-5249	
Bear now forage at lower altitudes, at greater dangers of human conflict. Agriculture has reduced the moths of the cutworm moth. This food, up to 72% fat, has been called a "bear superfood", by internationally known expert David Mattson, PhD. But this food source has dropped precipitously as result of insecticides used by farmers. Introduction of piscivorous non-native fish into Yellowstone lake has resulted in drastic reduction of cutthroat trout - yet another of the main 3 or 4 high-fat and protein sources that support bear reproductivity, which in the best of times, is still remarkably slow.	Factor A	delisting of Yellowstone grizzlies is very premature as there has been no specific study of the impacts upon the grizzlies of Yellowstone that has occurred as the result of reduction of specialized foods primarily contributing to the success of their recovery. Four specific foods have been particularly noted: seeds of the white bark pine. The seeds of this pine represent a high-fat high diet for the bears, growing at high altitudes is also kept bears from human contact to a great degree. But only 20% of the white bark pine that existed 20 years ago still exists today. Bear now forage at lower altitudes, at greater dangers of human conflict. Agriculture has reduced the moths of the cutworm moth. This food, up to 72% fat, has been called a "bear superfood", by internationally known expert David Mattson, PhD. But this food source has dropped precipitously as result of insecticides used by farmers. Introduction of piscivorous non-native fish into Yellowstone lake has resulted in drastic reduction of cutthroat trout - yet another of the main 3 or 4 high-fat and protein sources that support bear reproductivity, which in the best of times, is still remarkably slow. The USFWS should listen to the best science rather than wishful thinking, greed, and hand-waving, touchy-feely estimates and wild-ass guesses. The USFWS is about to precipitate another catastrophic collapse of Yellowstone's grizzlies, and those who bring it about will go down in history.... literally, they will go down...	FWS-R6-ES-2016-0042-5279	
- Grizzlies occupy only 1% of their historic range.	Factor A	#NAME?	FWS-R6-ES-2016-0042-5249	
The delisting plan lacks binding motorized access management standards to protect habitat. The 1993 Grizzly Bear Recovery Plan and scientific research have demonstrated that roads kill bears.	Factor A	The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population. Research has also shown threshold population effects, which could mean that by the time the problem is detected, it is too late to fix the problem. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Indeed, at the recent announcement of the delisting proposal, Senator Larry Craig used the opportunity to call for weakening the Endangered Species Act. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources. The delisting plan lacks binding motorized access management standards to protect habitat. The 1993 Grizzly Bear Recovery Plan and scientific research have demonstrated that roads kill bears.	FWS-R6-ES-2016-0042-5224	

Ensuring that robust protections remain in place for the Yellowstone grizzly bear core population including strict limits on mortality and strong habitat protections within the Primary Conservation Area (PCA), the area identified to remain the most protective for grizzly bears after delisting;- Giving Yellowstone grizzly bears the opportunity to continue to expand their range and reconnect with other grizzly bear populations to the north as wells as allow for Yellowstone grizzly bears to expand into the Bitterroot Recovery Zone, currently absent of a grizzly bear population;- Expanding and strengthening habitat protections currently only allocated to the PCA into the larger Demographic Monitoring Area and further into areas identified as important to linkage between grizzly bear populations;	Factor A	Thank you for the opportunity to comment on potential Yellowstone Grizzly de-listing. Prairie Hills Audubon Society wants to be assured that the states and federal land management agencies, including the U.S. Forest Service, will manage bears and their habitat in a way that ensures a healthy and expanding grizzly bear population into the future. Prairie Hills Audubon Society is seriously concerned that the U.S. Fish and Wildlife Service (FWS) does not have all the required information and assurances finalized to make an informed decision. Specifically, the Endangered Species Act requires that, before delisting can occur, among other things, there are adequate regulatory mechanisms in place to ensure that the grizzly bear does not slip back towards extinction. These regulatory mechanisms are the responsibility of the states of Wyoming, Montana and Idaho and the appropriate federal land management agencies. However, the necessary management plans that provide these commitments have not been finalized and provided to us by the FWS for review with the proposal. Wyoming has yet to finalize a revised grizzly bear state management plan, and the recently completed draft is not consistent with statements made in the delisting proposal. It is unclear if, let alone when, Idaho or Montana will update their management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the adequate regulatory mechanisms that are required. With development increasing in the Northern Rockies region, public lands are critical for providing essential secure habitat for grizzly bears into the future. The agencies in charge of our public lands have an obligation to ensure that an iconic species like the grizzly bear can continue to thrive. However, the U.S. Forest Service has not revealed when it will amend the management plans of the six national forests surrounding Yellowstone to provide for adequate habitat protections for grizzly bears post-delisting or when this process would be available for public review. Prairie Hills Audubon Society encourages the FWS to continue to work with the state grizzly bear management agencies, tribal agencies and state and federal land management agencies that will be responsible for grizzly bears post delisting on: - Ensuring that robust protections remain in place for the Yellowstone grizzly bear core population including strict limits on mortality and strong habitat protections within the Primary Conservation Area (PCA), the area identified to remain the most protective for grizzly bears after delisting; - Giving Yellowstone grizzly bears the opportunity to continue to expand their range and reconnect with other grizzly bear populations to the north as wells as allow for Yellowstone grizzly bears to expand into the Bitterroot Recovery Zone, currently absent of a grizzly bear population; - Expanding and strengthening habitat protections currently only allocated to the PCA into the larger Demographic Monitoring Area and further into areas identified as important to linkage between grizzly bear populations; - Continuing and strengthening programs that proactively minimize conflicts between bears and people thereby improving social tolerance and public acceptance for the bears throughout their range; and, - Working together to broaden partnerships and secure long term adequate funding for grizzly bear conservation and recovery into the future. It is strongly oppose the US FWS proposal to delist the Yellowstone grizzly bear and strip the species ESA protections. I am a third generation Wyomingite, and a US citizen. I am concerned that Wyoming sees the delisting proposal as an invitation to begin hunting the bears as trophies. The grizzly bears have the greatest value to Americans, and all the public, alive. The US FWS holds wildlife in the public trust for the enjoyment of all, and if hunters are killing grizzlies for trophies, instead of me being able to enjoy seeing living bears, hunters will be hanging bear skins on their wall. Bears do not belong on walls, they belong in the ecosystem. Wyoming has already started a public comment period, which ends of April 14, 2016, to begin a trophy hunt of grizzly bears. This does not show an intent to protect the bears and ensure their continued survival. Wyoming's management plan is just a road map to killing bears, and a copy of it it attached hereto. This management plan demonstrates how important it is to leave grizzlies on the endangered species list. The USFWS conclusions that climate change is not a threat to the bears, and will not be in the future, overlooks the scientific facts regarding the grizzly's food sources. All the grizzly bears' major food sources are in decline: the whitebark pine due to pine beetle infestation, an infestation caused by our warming world, the cutworm moth, and the cutthroat trout which are under threat from the invasive lake trout. The US FWS argues that there are alternate sources of food available to the grizzly bears, but has not shown any scientific data that would even begin to establish that those purported alternative sources of food have the necessary nutrition to meet the grizzly bears' dietary needs. In 2011 grizzly bears were placed back on the endangered species list because this agency failed to consider threats to the grizzly bears food sources, and that scientific uncertainty was not a sufficient rationale for failing to evaluate possible risks to a species the FWS proposed to delist and remove See, from ESA protections. See, Greater Yellowstone Coalition, Inc v. Servheen, 665 F.3d 1015, (9th Cir. 2011), a copy of which is also attached hereto. This holding of Greater Yellowstone Coalition, Inc. v. Servheen is still applicable today, as we continue to face the increased effects of global warming, and the grizzly bears' food sources continue to fall under that threat. The US FWS would be wise to review the Court's decision, and the scientific resources cited therein, before taking the rash action of delisting the grizzly bear. Instead of delisting the grizzly bear, the US FWS should be seeking areas to reestablish the grizzly populations, which is a goal that the US FWS cited in its 2011 status review of grizzly bears. Additionally, the US FWS cited in that same review, an expectation that the Continental Dive bears and the Yellowstone bears would naturally connect "in the near future", however, that will not come to pass if trophy hunters are allowed to kill bears that leave the national parks systems. The US FWS has these expectations based on outdated research, and without taking into consideration the massive detrimental effects a delisting will have on the grizzly bear population. If the delisting happens, bears that strike out in order to seek new ecosystems will leave the protections of the national parks, and be subject to hunting, ensuring that these brave bears cannot aid in the continued survival of the species. There are resources for the bears, and ecosystems to support them, but the bears will never get there if we allow hunters to kill the bears once they leave the national parks. There is no evidence that the current grizzly population in the Greater Yellowstone ecosystem is diverse enough to provide the required genetic diversity to support the continued survival of the species. The Yellowstone grizzly population has not connected with the Northern Continental Divide grizzly population, or the Cabinet-Yaak region grizzly bears. The current bear separate populations need the opportunity to reach each other in order to ensure continued genetic diversity, and if hunters are allowed to kill grizzly bears then the moment grizzlies step outside the national parks they will be subject to trophy hunting, making it even more difficult, if not impossible, for the different bear groups to reach each other. The reasons not to delist the grizzly bear are legion, and the US FWS should not proceed with this rule. Please keep the grizzly bear's protected status under the ESA. The continued survival of the grizzly depends on it.	FWS-R6-ES-2016-0042-5311	
Instead of delisting the grizzly bear, the US FWS should be seeking areas to reestablish the grizzly populations, which is a goal that the US FWS cited in its 2011 status review of grizzly bears. Additionally, the US FWS cited in that same review, an expectation that the Continental Dive bears and the Yellowstone bears would naturally connect "in the near future", however, that will not come to pass if trophy hunters are allowed to kill bears that leave the national parks systems. The US FWS has these expectations based on outdated research, and without taking into consideration the massive detrimental effects a delisting will have on the grizzly bear population. If the delisting happens, bears that strike out in order to seek new ecosystems will leave the protections of the national parks, and be subject to hunting, ensuring that these brave bears cannot aid in the continued survival of the species. 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The reasons not to delist the grizzly bear are legion, and the US FWS should not proceed with this rule. Please keep the grizzly bear's protected status under the ESA. The continued survival of the grizzly depends on it.	Factor A	It is strongly oppose the US FWS proposal to delist the Yellowstone grizzly bear and strip the species ESA protections. I am a third generation Wyomingite, and a US citizen. I am concerned that Wyoming sees the delisting proposal as an invitation to begin hunting the bears as trophies. The grizzly bears have the greatest value to Americans, and all the public, alive. The US FWS holds wildlife in the public trust for the enjoyment of all, and if hunters are killing grizzlies for trophies, instead of me being able to enjoy seeing living bears, hunters will be hanging bear skins on their wall. Bears do not belong on walls, they belong in the ecosystem. Wyoming has already started a public comment period, which ends of April 14, 2016, to begin a trophy hunt of grizzly bears. This does not show an intent to protect the bears and ensure their continued survival. Wyoming's management plan is just a road map to killing bears, and a copy of it it attached hereto. This management plan demonstrates how important it is to leave grizzlies on the endangered species list. The USFWS conclusions that climate change is not a threat to the bears, and will not be in the future, overlooks the scientific facts regarding the grizzly's food sources. All the grizzly bears' major food sources are in decline: the whitebark pine due to pine beetle infestation, an infestation caused by our warming world, the cutworm moth, and the cutthroat trout which are under threat from the invasive lake trout. The US FWS argues that there are alternate sources of food available to the grizzly bears, but has not shown any scientific data that would even begin to establish that those purported alternative sources of food have the necessary nutrition to meet the grizzly bears' dietary needs. In 2011 grizzly bears were placed back on the endangered species list because this agency failed to consider threats to the grizzly bears food sources, and that scientific uncertainty was not a sufficient rationale for failing to evaluate possible risks to a species the FWS proposed to delist and remove See, from ESA protections. See, Greater Yellowstone Coalition, Inc v. Servheen, 665 F.3d 1015, (9th Cir. 2011), a copy of which is also attached hereto. This holding of Greater Yellowstone Coalition, Inc. v. Servheen is still applicable today, as we continue to face the increased effects of global warming, and the grizzly bears' food sources continue to fall under that threat. The US FWS would be wise to review the Court's decision, and the scientific resources cited therein, before taking the rash action of delisting the grizzly bear. Instead of delisting the grizzly bear, the US FWS should be seeking areas to reestablish the grizzly populations, which is a goal that the US FWS cited in its 2011 status review of grizzly bears. Additionally, the US FWS cited in that same review, an expectation that the Continental Dive bears and the Yellowstone bears would naturally connect "in the near future", however, that will not come to pass if trophy hunters are allowed to kill bears that leave the national parks systems. The US FWS has these expectations based on outdated research, and without taking into consideration the massive detrimental effects a delisting will have on the grizzly bear population. If the delisting happens, bears that strike out in order to seek new ecosystems will leave the protections of the national parks, and be subject to hunting, ensuring that these brave bears cannot aid in the continued survival of the species. There are resources for the bears, and ecosystems to support them, but the bears will never get there if we allow hunters to kill the bears once they leave the national parks. There is no evidence that the current grizzly population in the Greater Yellowstone ecosystem is diverse enough to provide the required genetic diversity to support the continued survival of the species. The Yellowstone grizzly population has not connected with the Northern Continental Divide grizzly population, or the Cabinet-Yaak region grizzly bears. The current bear separate populations need the opportunity to reach each other in order to ensure continued genetic diversity, and if hunters are allowed to kill grizzly bears then the moment grizzlies step outside the national parks they will be subject to trophy hunting, making it even more difficult, if not impossible, for the different bear groups to reach each other. The reasons not to delist the grizzly bear are legion, and the US FWS should not proceed with this rule. Please keep the grizzly bear's protected status under the ESA. The continued survival of the grizzly depends on it.	FWS-R6-ES-2016-0042-0524	

Dr. Michael Gibeau has done a lot of research on the correlation between increased number of roads and bear mortality. Based on this information, bears are greatly affected by the amount of human interaction and can definitely stress them out. I believe that the best way to conserve the bears is to conserve their habitat and try to decrease the human interaction (for example by building fewer roads through their homes).	Factor A	The United States Fish and Wildlife Service proposes to remove the Greater Yellowstone Ecosystem (GYE) Grizzly Bears from the Endangered and Threatened Wildlife list. Also, the affected states promise to continue to ensure the grizzly bear population remains. I think that delisting the Grizzly Bears would only work if there were policies that were strictly enforced to ensure the continuation of the grizzly bear population. The major worry is that human caused mortality will quickly exceed the grizzly bear reproduction. Grizzly bear reproduction is a slow process and about half the cubs do not survive. Based on the fact that they are slow reproducers I believe the bears should stay on the endangered list for at least 5-10 more years and then maybe slowly introduce different policies that may allow regulated hunting again. According to an article in the national geographic that addresses this issue, it is believed that if the very states that failed to ensure the populations of grizzly bears gain control again, the population will quickly dwindle. Also, it is believed that this means the laws implanted will not be enforced well by these states. According to the article, the bears are worth a billion annually alive than dead, so it is better to keep the hunting levels down. Another problem endangering the grizzly bears is habitat and food. According to Yellowstone, there has been a 15-20 percent loss of their genetic variability. This could cause "inbreeding and worsen problems stemming from food loss, habitat loss and conflicts with people. A lot of these problems have to do with increased interaction between bears and humans. Dr. Michael Gibeau has done a lot of research on the correlation between increased number of roads and bear mortality. Based on this information, bears are greatly affected by the amount of human interaction and can definitely stress them out. I believe that the best way to conserve the bears is to conserve their habitat and try to decrease the human interaction (for example by building fewer roads through their homes). In conclusion I think that the bears should not be delisted, at least not right now. When thinking about laws as a nation we must remember there will always be people who break the law. Therefore delisting them can cause people to break the rules more and more, as the laws become increasingly lenient.	FWS-R6-ES-2016-0042-0569	
Housing, retailing, and energy development in Yellowstone's surrounding counties have been accelerating in the past decade. Additionally, the bears' major food sources - such as white bark pine nuts, cutthroat trout, and ungulate meat - are becoming threatened. The Grizzlies' are taking measures to compensate for this reduction in food, but it proves to be difficult with less livable area. Food shortage leads for Grizzlies to become hungrier and more desperate for food. Bear advocate Louisa Wilcox said, "when bears traverse the landscape looking for food, they bump into people at high rates, and when they bump into people, they tend to die at high rates." The bears' long-term could be in jeopardy because of less habitat and less food. Although the GYE Grizzlies' numbers are up now, delisting them could completely undo the progress of the past 40 years. The habitat encroachment and increased human activities around the Grizzlies' territory is also a cause for not delisting the animal. Counties surrounding National Parks are shown to have high rates of growth and Yellowstone is no exception. According to Yellowstone Park, "20 counties surrounding the Greater Yellowstone jumped a whopping 14 percent in population in the last decade." An increase in the human population will call for more roads, more houses, more materials gathered. All of these factors will leave less habitat space for bears, while increasing the likelihood of human and bear interactions, which, unfortunately, more often than not leads to a dead bear. Bears are also very opportunistic and will eat whatever food it can get its paws on. The problem with this is that once bears get into contact with food from humans, whether it is waste, bird feed or gardens, they will often return for more. Again, increasing the contact between humans and bears.	Factor A	The Greater Yellowstone Ecosystem (GYE) Grizzly Bear is an intelligent and emotional creature that is crucial to Yellowstone's and its surrounding areas' ecosystems. The population numbers alone show that the bear has more than tripled its numbers from the time the GYE Grizzly Bear was added to the Endangered Species List in 1975, growing from less than 200 to close to 800. This population increase is a huge improvement and cause for acknowledgement; however, the numbers alone do not tell the full story. Housing, retailing, and energy development in Yellowstone's surrounding counties have been accelerating in the past decade. Additionally, the bears' major food sources - such as white bark pine nuts, cutthroat trout, and ungulate meat - are becoming threatened. The Grizzlies' are taking measures to compensate for this reduction in food, but it proves to be difficult with less livable area. Food shortage leads for Grizzlies to become hungrier and more desperate for food. Bear advocate Louisa Wilcox said, "when bears traverse the landscape looking for food, they bump into people at high rates, and when they bump into people, they tend to die at high rates." The bears' long-term could be in jeopardy because of less habitat and less food. Although the GYE Grizzlies' numbers are up now, delisting them could completely undo the progress of the past 40 years. The habitat encroachment and increased human activities around the Grizzlies' territory is also a cause for not delisting the animal. Counties surrounding National Parks are shown to have high rates of growth and Yellowstone is no exception. According to Yellowstone Park, "20 counties surrounding the Greater Yellowstone jumped a whopping 14 percent in population in the last decade." An increase in the human population will call for more roads, more houses, more materials gathered. All of these factors will leave less habitat space for bears, while increasing the likelihood of human and bear interactions, which, unfortunately, more often than not leads to a dead bear. Bears are also very opportunistic and will eat whatever food it can get its paws on. The problem with this is that once bears get into contact with food from humans, whether it is waste, bird feed or gardens, they will often return for more. Again, increasing the contact between humans and bears. I oppose the proposed rule to delist the Greater Yellowstone Ecosystem Grizzly Bear because it will inevitably lead to the re-addition of the bear to the Endangered Species List. http://news.nationalgeographic.com/2015/10/151001-grizzly-bears-animals-science-conservation-nation/ http://www.counterpunch.org/2016/01/01/delisting-the-grizzly-a-recipe-for-more-bear-deaths/ http://www.yellowstonepark.com/grizzly-bears-endangered/	FWS-R6-ES-2016-0042-0571	

Since the Taylor Fork Drainage of Montana is also critical springtime lower altitude habitat for grizzly bears, they should also not be hunted there (which is hopefully within the Grizzly Bear Recovery Area, or should be).	Factor A	First, I think that within the Grizzly Bear Recovery Area or Grizzly Bear Recovery Zone outside of Yellowstone Park or the Greater Yellowstone Ecosystem grizzlies should NOT be hunted because there's a very rare phase of the grizzly that lives there that is even more endangered, the Black Grizzly, also documented by Doug Peacock in a chapter of his book the Grizzly Years. These Black Grizzlies also live in Yellowstone. It's a similar situation to the white Spirit or Kermode black bears that are found and given protection from hunting in Canada. There are too few of these bears to sustain a hunt, I've only seen a handful of them, though a number of them do exist, documented by extensive video and photos by another professional wildlife photographer and author. Since the Taylor Fork Drainage of Montana is also critical springtime lower altitude habitat for grizzly bears, they should also not be hunted there (which is hopefully within the Grizzly Bear Recovery Area, or should be). The Interagency Grizzly Bear Study Team has been collaring and studying bears there for decades, and some of the bears that they have collared, at least one, is a black grizzly. Contrary to what they have said in the past, these bears are not dark brown, seen in cloudy conditions or backlit, they are black even in bright sun, without any of the silvertip of other grizzlies. I've seen very large male (larger than what is acknowledged publicly, absolutely enormous, though seldom seen), females, and cubs of this type. Presumably cubs are in especial danger of being mistaken for ursus americanus and hunted because they haven't developed adult grizzly characteristics. It should be noted that the Interagency Grizzly Bear Study Team has at least one of these bears collared, I believe, which I've witnessed. Their denial would not negate the existence of these bears, which also have been sighted within Yellowstone Park in two locations by me personally over the years, once in very good light over several days. Outside the park I've seen such an individual over many years. Also, although grizzlies used to frequent the Taylor Fork during the spring, last year I had no sightings whatsoever during this season in this critical habitat. Where there used to be grizzly digging activity evident everywhere, there was almost none. There could be several causes. Increased presence of hunters looking for Ursus Americanus during this season (there are none there anymore, there used to be a many years ago, a decade or more) which scared the grizzlies out of there too, the removal of cattle from summer grazing leases because of increased regulation around streams which might have messed up the ecosystem somehow, altering the vegetation so it's no longer favorable to the moles or gophers that the grizzlies used to subsist on during the spring (what look like moles collect caches of what look somewhat like corn to horde underground, which the grizzlies excavate and presumably eat, along with the moles along the line of the melting snow, when the burrows are easy to dig and tunnels flooded, probably). So, perhaps this food source is also now gone, what with the cattle removed that might have been an equivalent replacement for bison that have been absent. Perhaps if bison are allowed to return to this area during the summer, under the governor's plan, this will no longer be a problem. However, I think less bison will be tolerated outside the park during the summer? There are much fewer elk because a different subspecies of wolf was introduced from northern Canada near the Yukon, so they are no longer grazing down the	FWS-R6-ES-2016-0042-0599	
Climate changes, temperature increases, loss of white bark pine and other critical habitat components are totally unpredictable and are happening exponentially faster than predicted or considered. The apex predators are unable to adapt to those changes and will all be lost within a very short period of time. In the mean time we need to do everything humanly possible to provide them a bridge that helps them make the necessary adjustments, if that will even be possible. Humans need to stay out of areas that the grizzly needs for survival. If a bear-human conflict should occur I want to see nonlethal means used, prior to lethal removal.	Factor A	Please do not remove (delist) the grizzly bear from the protections stated in the Endangered Species Act. Even though it may appear that the grizzly has met the standard for the delisting rule, which opens the door for legal hunting, that is not the appropriate means of population control. The long term effects of the proposed delist control measures are tenuous at best. Climate changes, temperature increases, loss of white bark pine and other critical habitat components are totally unpredictable and are happening exponentially faster than predicted or considered. The apex predators are unable to adapt to those changes and will all be lost within a very short period of time. In the mean time we need to do everything humanly possible to provide them a bridge that helps them make the necessary adjustments, if that will even be possible. Humans need to stay out of areas that the grizzly needs for survival. If a bear-human conflict should occur I want to see nonlethal means used, prior to lethal removal. Travelers from all over the world visit the Yellowstone region in hopes of seeing and photographing the apex predators. That brings a lot of revenue into the local economies surrounding the Yellowstone region. It brings a lot of good will with it as well. Grizzly bears are not just a treasure of the state of Montana and the United States, they are a treasure of this planet and all of the people and children of future generations, and we need to start thinking in the bigger sense using an expanded perspective that we are the stewards of this planet and all the species who inhabit it. Please do the right thing and do not delist the grizzly, and, do not allow hunting of it for at least (5) five years post-delisting. Thank you for considering my comments and concerns.	FWS-R6-ES-2016-0042-0614	
Further, GYE grizzlies are genetically isolated from bears in the north and there are no plans allowing for connectivity, which is critical for long term survival of the species. Grizzlies occupy a tiny fraction of their historic range so it is difficult to consider them "recovered."	Factor A	I strongly oppose the delisting of the Greater Yellowstone Ecosystem grizzly bear. First, these bears are under threat from a changing climate. They have four primary food sources. Two of these - whitebark pine seeds and cutthroat trout - have been decimated in recent years by climate change. The third food source - moths - is unreliable due to expanded pesticide use. Despite this, the USFWS has stated that climate change has not and likely will not have any impact on GYE grizzlies. This makes no sense and, in light of the wolverine decision, must be reconsidered. As a result of declining food sources, the bears have switched to more meat which increasingly puts them in conflict with ranchers and other humans. These conflicts often lead to the offending bear's removal from the ecosystem and resulted in a record number of bears removed last year. Further, GYE grizzlies are genetically isolated from bears in the north and there are no plans allowing for connectivity, which is critical for long term survival of the species. Grizzlies occupy a tiny fraction of their historic range so it is difficult to consider them "recovered." Finally, all three states involved - Wyoming, Montana and Idaho - have indicated that they will allow a trophy hunting season of these bears once delisted. Americans overwhelmingly disapprove of trophy hunting and, because there is no buffer or even no hunt zone between Yellowstone and Grand Tetons national parks, it is likely that famous roadside bears who are tolerant of people would be the first killed. This would create a firestorm of public outrage and damage the thriving tourism economy of the region. For these reasons, I oppose delisting and urge the USFWS to reexamine the plan to delist to consider the impact of climate change.	FWS-R6-ES-2016-0042-0660	

Conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat.	Factor A	The protections of the Endangered Species Act are critical to the continued recovery of GYE grizzly bears. Conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat.	FWS-R6-ES-2016-0042-0674	
The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. These bears are apex predators, the ecosystem needs them.	Factor A	Please, help the grizzly bears keeping the needed protection. The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. These bears are apex predators, the ecosystem needs them.	FWS-R6-ES-2016-0042-0731	
3) Human population growth and urban development infringes on habitat and connectivity between populations.	Factor A	I am against the removal of the Greater Yellowstone Grizzly Bear Population from the Federal List of Endangered and Threatened Species for the following reasons: 1) Climate Change is impacting the ecosystem - reducing white-bark pine nuts available to grizzlies. 2) Climate Change is impacting and altering the ecosystem in ways that we do not foresee. 3) Human population growth and urban development infringes on habitat and connectivity between populations. 4) Disease can spread through a small population and reduce the population significantly and/or cause extinction - such as has occurred with Tasmanian Devil (Devil facial tumor disease). 5) There is no protected natural connectivity to the Selway Bitterroot area in Idaho. 6) There is no nearby grizzly population in the Selway Bitterroot area in Idaho. 6) Delisting will allow trophy hunting of the grizzly bear - which is a thoroughly disgusting and self centered pastime.	FWS-R6-ES-2016-0042-0727	
Another imperiled category of grizzlies are those who wander far from Yellowstone, attempting to link up with bear populations south of Glacier National Park. This connectivity is absolutely necessary for the longtime survival of Yellowstone's biologically-isolated grizzly bear population. Young male bears are often the first to begin this journey (which is essential for genetic viability), followed by female grizzlies whose presence constitutes true colonization of new habitats. Yet these bold, indispensable animals will be shot on sight.	Factor A	In an isolated, island ecosystem like Yellowstone, once the number of dead bears greatly exceeds the number of cubs born, you're headed toward extinction. Here are the current stats: The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bears an accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality. Delisting the Yellowstone grizzlies will make them very easy for anyone to kill; without federal protection, their bearish lives will be made expendable. Another imperiled category of grizzlies are those who wander far from Yellowstone, attempting to link up with bear populations south of Glacier National Park. This connectivity is absolutely necessary for the longtime survival of Yellowstone's biologically-isolated grizzly bear population. Young male bears are often the first to begin this journey (which is essential for genetic viability), followed by female grizzlies whose presence constitutes true colonization of new habitats. Yet these bold, indispensable animals will be shot on sight. Global warming, which the FWS denies has any effect at all on the lives or futures of grizzlies, is in itself sufficient reason to never delist the Yellowstone grizzly. For one thing, the region can likely expect a terrifying drought. But climate change has already proven a disaster for grizzlies. For millennia, the park's grizzlies have fed on nuts from the whitebark pine. The nut is highly nutritious and mother grizzlies who eat pine nuts have more cubs and better survival rates. Whitebark pine forests grow at high elevations in remote places, and so serve to separate vulnerable young and mother bears from armed hunters at lower altitudes outside the park during hunting season.	FWS-R6-ES-2016-0042-0747	
As human habitation threatens grizzlies' ability to successfully move between protected habitats (e.g., Yellowstone to grizzly-habitats south of Glacier National Park) it would be deeply wrong and tragic for FWS to make it easier for trophy-hunters to slaughter these apex predators for sport. Humans have encroached upon more than enough grizzly habitat.	Factor A	I strongly oppose delisting the Grizzlies who live in Yellowstone from the endangered/threatened wildlife list. These animals, the second-slowest reproducing land mammals on the North American continent, are deeply threatened already by the human activity that has led to climate change and drastically affected availability of the whitebark pine's nuts, which grizzlies have relied on for millennia. As human habitation threatens grizzlies' ability to successfully move between protected habitats (e.g., Yellowstone to grizzly-habitats south of Glacier National Park) it would be deeply wrong and tragic for FWS to make it easier for trophy-hunters to slaughter these apex predators for sport. Humans have encroached upon more than enough grizzly habitat. Do not permit those who want to hang grizzly heads on their walls or tramp on grizzly skin rugs to encroach further.	FWS-R6-ES-2016-0042-0762	

The iconic Yellowstone Grizzly Bear , the apex predator of that ecosystem, deserves continued long term protection. The present small population of 700 bears can not afford being hunted as it's in a closed ecosystem and needs a population which can find migration corridors to other habitats and systems, such as Glacier Park, The Bitterroot Selway and River of No Retun Wilderness areas to provided genetic diversity and healthy Grizzly populations.	Factor A	As a native born resident of Wyoming (born Casper-1950) I am very disturbed that the Fish and Wildlife would consider de-listing the Yellowstone Grizzly Bear. I am a hunter and fly-fisherman and I have spent my entire life visiting the park and surrounding wilderness areas. My three daughters have grown up camping in the Park and mountains there. In fact our frequent trips there, when they were children , were the cornerstone of their respect for Wilderness and Nature. The iconic Yellowstone Grizzly Bear , the apex predator of that ecosystem, deserves continued long term protection. The present small population of 700 bears can not afford being hunted as it's in a closed ecosystem and needs a population which can find migration corridors to other habitats and systems, such as Glacier Park, The Bitterroot Selway and River of No Retun Wilderness areas to provided genetic diversity and healthy Grizzly populations. For the FWS to say " Therefore , we conclude that the effects of climate change do not constitute a threat to the (Yellowstone Grizzly Bear) population now, nor are they anticipated in the future" is a gross misrepresentation of the actual facts and conditions in the park and surrounding ecosystems. Having spent my entire life in the area I have personally seen the effects of climate change on 95% of the White Bark Pine (their nuts being the important food supply for Grizzly Bears) from huge swaths of forest being attacked by Pine Beetle. Further, Yellowstone Cutthroat populations (Whirling Disease) not to mention the introduction of invasive Lake Trout have likewise effected the Grizzly Bear food supply. Epic droughts have caused mega catastrophic fires in the region which are a direct result of Climate Warming. These among many other examples are just a few of the issues which will effect the future of the Yellowstone Grizzly bear. The economics of a few hunting guides taking hunters, or independent hunters, using the areas surrounding the park are nothing compared to the economic engine of wildlife viewing in and around the park and the economic benifits from outdoor recreation for the towns and visitors coming to Yellowstone and the Grand Tetons. The Iconic Grizzly Bear is the face of Wilderness and of our National Parks. Do Not de-list the Yellowstone Grizzly Bear, this would be folly and the most damaging example of poor wildlife management.	FWS-R6-ES-2016-0042-0755	
If ranchers on mine and everyone's federal land surrounding the park can't work with the bears then maybe the need to find greener pastures.	Factor A	This is a crime ! First the bears are endangered know where near there historic range. Yes there numbers may be up in the Yellowstone area, but look at how much work and commitment it took and almost a daily fight to get the bears to this point. Look at what the population was like going into early 70's and that was thanks to our great park service that is there to protect the land and wildlife. It is Americans land and the park service works for us the tax payers. Time to start listening to the people. There is know way of knowing how many bears will be killed by poacher, cars etc. and you want to delist them when the lost of just one breeding age female is detrimental to the population. What is wrong with you people! The climate is changing and you don't even know the requirements this bears are going to need in say 10 or 20 years. You (park service) came close to loosing these magnificent animals through your poor practices in the 60's and 70's. Then the had more free land in which to rebound back from and more spanning cutthroat trout and whitepine nuts which no longer exists. The government should be using this money ,time and energy in getting more land surrounding yellowstone so the bears can use land they need to survive into the next generations. Like endanger spices should have its the law isn't it. If ranchers on mine and everyone's federal land surrounding the park can't work with the bears then maybe the need to find greener pastures. They have the rest of america to use. The bears don't have that options! It is time for the park service to do the right thing here and not gave into small interest groups, or a few archaic out of touch people in power. Please do the right thing here an protect the bears, which any body knows should be done.	FWS-R6-ES-2016-0042-0774	
For the FWS to say " Therefore , we conclude that the effects of climate change do not constitute a threat to the (Yellowstone Grizzly Bear) population now, nor are they anticipated in the future" is a gross misrepresentation of the actual facts and conditions in the park and surrounding ecosystems. Having spent my entire life in the area I have personally seen the effects of climate change on 95% of the White Bark Pine (their nuts being the important food supply for Grizzly Bears) from huge swaths of forest being attacked by Pine Beetle. Further, Yellowstone Cutthroat populations (Whirling Disease) not to mention the introduction of invasive Lake Trout have likewise effected the Grizzly Bear food supply. Epic droughts have caused mega catastrophic fires in the region which are a direct result of Climate Warming. These among many other examples are just a few of the issues which will effect the future of the Yellowstone Grizzly bear.The economics of a few hunting guides taking hunters, or independent hunters, using the areas surrounding the park are nothing compared to the economic engine of wildlife viewing in and around the park and the economic benifits from outdoor recreation for the towns and visitors coming to Yellowstone and the Grand Tetons.The Iconic Grizzly Bear is the face of Wilderness and of our National Parks. Do Not de-list the Yellowstone Grizzly Bear, this would be folly and the most damaging example of poor wildlife management.	Factor A	As a native born resident of Wyoming (born Casper-1950) I am very disturbed that the Fish and Wildlife would consider de-listing the Yellowstone Grizzly Bear. I am a hunter and fly-fisherman and I have spent my entire life visiting the park and surrounding wilderness areas. My three daughters have grown up camping in the Park and mountains there. In fact our frequent trips there, when they were children , were the cornerstone of their respect for Wilderness and Nature. The iconic Yellowstone Grizzly Bear , the apex predator of that ecosystem, deserves continued long term protection. The present small population of 700 bears can not afford being hunted as it's in a closed ecosystem and needs a population which can find migration corridors to other habitats and systems, such as Glacier Park, The Bitterroot Selway and River of No Retun Wilderness areas to provided genetic diversity and healthy Grizzly populations. For the FWS to say " Therefore , we conclude that the effects of climate change do not constitute a threat to the (Yellowstone Grizzly Bear) population now, nor are they anticipated in the future" is a gross misrepresentation of the actual facts and conditions in the park and surrounding ecosystems. Having spent my entire life in the area I have personally seen the effects of climate change on 95% of the White Bark Pine (their nuts being the important food supply for Grizzly Bears) from huge swaths of forest being attacked by Pine Beetle. Further, Yellowstone Cutthroat populations (Whirling Disease) not to mention the introduction of invasive Lake Trout have likewise effected the Grizzly Bear food supply. Epic droughts have caused mega catastrophic fires in the region which are a direct result of Climate Warming. These among many other examples are just a few of the issues which will effect the future of the Yellowstone Grizzly bear. The economics of a few hunting guides taking hunters, or independent hunters, using the areas surrounding the park are nothing compared to the economic engine of wildlife viewing in and around the park and the economic benifits from outdoor recreation for the towns and visitors coming to Yellowstone and the Grand Tetons. The Iconic Grizzly Bear is the face of Wilderness and of our National Parks. Do Not de-list the Yellowstone Grizzly Bear, this would be folly and the most damaging example of poor wildlife management.	FWS-R6-ES-2016-0042-0755	

Arguments against delisting due to food source reduction and human development are justifiable but are issues that impact most wild species, especially big game and apex predators. We should be addressing those problems individually to protect entire ecosystems not individual species.	Factor A	I am in favor of removing the GYE grizzlies from the endangered species list. Years of population and habitat data have shown healthy, sustainable bear populations. All of the goals set forth in the recovery plan have been met consistently for many years now to the point where their protected habitat is close to population capacity. The reasons for putting these animals on the endangered list, decimated population and shrinking habitat have both been addressed and the grizzly bears of the GYE are no longer in danger of going extinct. Arguments against delisting due to food source reduction and human development are justifiable but are issues that impact most wild species, especially big game and apex predators. We should be addressing those problems individually to protect entire ecosystems not individual species. The grizzly bear recovery program was a success and we should celebrate it as such so that we can utilize that experience and those resources to save other animals that truly are on the brink of extinction. The objective of the endangered species list is not to give a select few a comfortable and privileged existence it is to protect the most vulnerable from ceasing to exist.	FWS-R6-ES-2016-0042-0782	
As a conservationist, photographer, hunter, and fisherman I am in support of the science behind the decision to remove the Grizzly Bear from the Federal List of Endangered and Threatened Wildlife. Placement of this species on the ESL and careful management practices have allowed full recovery of the species, and should be celebrated as a success. However the populations of the Grizzly Bear have outgrown it's habitat, and threaten the balance of predators in the Yellowstone ecosystem.	Factor A	As a conservationist, photographer, hunter, and fisherman I am in support of the science behind the decision to remove the Grizzly Bear from the Federal List of Endangered and Threatened Wildlife. Placement of this species on the ESL and careful management practices have allowed full recovery of the species, and should be celebrated as a success. However the populations of the Grizzly Bear have outgrown it's habitat, and threaten the balance of predators in the Yellowstone ecosystem.	FWS-R6-ES-2016-0042-1052	
Over the last years since wolves were re-introduced into Yellowstone, hasn't scientific evidence proved the value of having an intact ecosystem for the health of all species and habitat? If the GYA bears are designated as a distinct and delisted population, haven't you condemned them to a slow extinction, due to lack of biodiversity? Wouldn't this time and effort be better directed toward expansion of the Greater Yellowstone Ecosystem and connection with the bear populations farther north and on into Canada?	Factor A	I strongly oppose delisting the GYA population of grizzly bears from The Endangered Species list. Over the last years since wolves were re-introduced into Yellowstone, hasn't scientific evidence proved the value of having an intact ecosystem for the health of all species and habitat? If the GYA bears are designated as a distinct and delisted population, haven't you condemned them to a slow extinction, due to lack of biodiversity? Wouldn't this time and effort be better directed toward expansion of the Greater Yellowstone Ecosystem and connection with the bear populations farther north and on into Canada? I'm sure many forces exert their power and influence on the USFW. I hope the forces for preservation prevail and we can anticipate even greater recovery and biodiversity for this magnificent creature.	FWS-R6-ES-2016-0042-5322	
This island has been isolated from other bear populations for over 100 years. As of this date the bears are still isolated from other populations and there is no provision in this delisting proposal to assure protected linkage habitat to other populations. In fact, the reverse is currently taking place with the US Sheep Experimental Station in the Centennial Mountains of Montana/Idaho still insisting that they must run sheep in this important linkage zone between Yellowstone and the vast central Idaho Wildlands (read their current EIS). The Sheep Station insistence that domestic sheep must take precedence over public wildlife helps insure that the Yellowstone bears will remain on an island.	Factor A	I oppose the proposed Yellowstone Grizzly Bear Delisting Rule removing the bear from the protections of the Endangered Species Act at this time. I oppose this proposal because the Yellowstone grizzly lives on an island. This island has been isolated from other bear populations for over 100 years. As of this date the bears are still isolated from other populations and there is no provision in this delisting proposal to assure protected linkage habitat to other populations. In fact, the reverse is currently taking place with the US Sheep Experimental Station in the Centennial Mountains of Montana/Idaho still insisting that they must run sheep in this important linkage zone between Yellowstone and the vast central Idaho Wildlands (read their current EIS). The Sheep Station insistence that domestic sheep must take precedence over public wildlife helps insure that the Yellowstone bears will remain on an island. I oppose this proposal because there is still no secure grizzly population in the vast Central Idaho Wildlands even though plans were prepared some 20 years ago to translocate suitable bears into Idaho. This population will be essential to link up with the Yellowstone bears and more northern bear populations to form a truly recovered meta-population of grizzlies in the Lower 48. Until we have such an Idaho population I will know that the USFWS is not serious about achieving true Yellowstone grizzly recovery and I will continue to oppose a Delisting Rule. I oppose this proposal because it will grant the states the right to begin to systematically target grizzlies attempting to recolonize former occupied habitat outside of a "Demographic Monitoring Area" for trophy sport hunts and this will guarantee that true grizzly recovery will be stopped in its tracks. A wide ranging top-level opportunistic omnivore such as the grizzly can not be turned over to the provincial interests of the livestock driven agendas of the state game departments of Wyoming, Idaho and Montana. I oppose this proposal because it does not take into account the unavoidable declining food resources in the Yellowstone core that will accompany the global climate change that is now underway. The grizzlies are adaptable but we must give them the room to adapt in the face of climate change. The State of Wyoming has no intention of giving them that room. The best scenario that this will result from the Delisting Rule is maintenance of a relic population of bears but it can not and will achieve true Yellowstone grizzly bear recovery. The bears must be allowed to disperse into all biologically suitable habitat. An example--The Wyoming Range likely has some of the best bear habitat in the Greater Yellowstone Ecosystem. Because of livestock political power the State of Wyoming considers any bears who attempt to recolonize this superb habitat to be expendable and, beyond doubt, they will be high on the list for trophy, sport hunts. To repeat--to turn management of the Yellowstone grizzlies over to the states will assure that all the investment of time and money up to now toward recovering these bears will be for naught and we will have snatched "defeat right out of the jaws of victory". Now is not the time to turn back. I oppose this premature Proposed Rule for Yellowstone Grizzly Bear Delisting from the Endangered Species Act.	FWS-R6-ES-2016-0042-1109	

My family has grazed in the Upper Green River, on the Bridger-Teton National Forest, for well over 100 years. We have persisted in spite of the long trail, bureaucrats, and grizzly bears. At no time in the history of the Upper Green River Cattle Association, of which my family was a founding member 100 years ago this year, has depredation from large carnivores, especially grizzlies, been so pervasive. In 1993, our association saw its first grizzly kill in a generation, and in 2015 members of the association saw 80 head of livestock confirmed by Wyoming Game and Fish personnel as killed by grizzly bears. In 2015, this association lost more nearly 14% of its calf crop, or 290 calves, to natural causes and predation. This level of predation is unprecedented.	Factor A	I submitted comments earlier in the process, but wish to do so again, as I have other issues to present. My family has grazed in the Upper Green River, on the Bridger-Teton National Forest, for well over 100 years. We have persisted in spite of the long trail, bureaucrats, and grizzly bears. At no time in the history of the Upper Green River Cattle Association, of which my family was a founding member 100 years ago this year, has depredation from large carnivores, especially grizzlies, been so pervasive. In 1993, our association saw its first grizzly kill in a generation, and in 2015 members of the association saw 80 head of livestock confirmed by Wyoming Game and Fish personnel as killed by grizzly bears. In 2015, this association lost more nearly 14% of its calf crop, or 290 calves, to natural causes and predation. This level of predation is unprecedented. We are excited to see that the grizzly bear may, once again, be delisted from the Endangered Species Act, and that management authority could return to the state of Wyoming. The Wyoming Game and Fish Department (WGFD) have been instrumental in supporting the recovery of this iconic species, and they have been great partners with our association through the thick and the thin of grizzly recovery. Without the compensation program initiated by the WGFD, most of us grazing cattle in the Upper Green would no longer be there, ending a 100 year tradition. Individual members of the WGFD have worked tirelessly, even 24/7, to resolve conflict issues when grizzlies kill livestock. In the past four years on the Upper Green River Cattle Allotment, confirmed depredations caused by grizzly bears have increased from 20 in 2010 to 80 in 2015. Since 1995, there have been over 500 head of cattle confirmed to have been killed by grizzly bears on this allotment. I fully support delisting of this species, as they have met every recovery goal ever established, and there have been several. Further, I support sport hunting of this species in areas like the Upper Green, where substantial conflict exists. I support management flexibility to address individual bears, not just numbers in a matrix. The Upper Green is in the Designated Monitoring Area (DMA), and the DMA was created to be an area both biologically suitable and socially acceptable for grizzly expansion. I have fought against the inclusion of the Upper Green in this grizzly management area, because the level of conflict that exists there is not socially acceptable to those of us making a living there. I ask that the Upper Green be removed from inclusion in the DMA. If the DMA is actually an area that is biologically important to grizzly bear recovery, then designate it such, but this area does not qualify as being socially acceptable for grizzly bears. The PCA was designated early on to be that area essential for grizzly bear recovery, and it has served that purpose well, as grizzlies have expanded great distances beyond the PCA. I am concerned that land use restrictions that have been put in place in the PCA, will be pushed throughout the DMA. I do not believe that is appropriate. How will the DMA boundary be amended in the future, as there is no process in place? If the states live up to their part of the bargain, and grizzlies continue to meet delisting requirements for the five year period that a conservation strategy is designed to exist for, can the DMA boundary be changed? USFWS should only retain management control for the five year period after the grizzly is delisted, then the states should have full management authority, unless the population demographics are not maintained. Why is there no physical	FWS-R6-ES-2016-0042-1222	
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USFWS should only retain management control for the five year period after the grizzly is delisted, then the states should have full management authority, unless the population demographics are not maintained. Why is there no physical description of the DMA in this proposed federal rule? Grizzly food sources are in decline, cub mortality rate is high, there is no connectivity between GYE and NCD ecosystems, human-caused mortality rate is high.	Factor A	I submitted comments earlier in the process, but wish to do so again, as I have other issues to present. My family has grazed in the Upper Green River, on the Bridger-Teton National Forest, for well over 100 years. We have persisted in spite of the long trail, bureaucrats, and grizzly bears. At no time in the history of the Upper Green River Cattle Association, of which my family was a founding member 100 years ago this year, has depredation from large carnivores, especially grizzlies, been so pervasive. 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	Factor A	See Attached Attachments Cardori Zachary	FWS-R6-ES-2016-0042-1139	
I oppose this proposal because it does not take into account the unavoidable declining food resources in the Yellowstone core that will accompany the global climate change that is now underway. The grizzlies are adaptable but we must give them the room to adapt in the face of climate change. The State of Wyoming has no intention of giving them that room.	Factor A	I oppose the proposed Yellowstone Grizzly Bear Delisting Rule removing the bear from the protections of the Endangered Species Act at this time. I oppose this proposal because the Yellowstone grizzly lives on an island. This island has been isolated from other bear populations for over 100 years. As of this date the bears are still isolated from other populations and there is no provision in this delisting proposal to assure protected linkage habitat to other populations. In fact, the reverse is currently taking place with the US Sheep Experimental Station in the Centennial Mountains of Montana/Idaho still insisting that they must run sheep in this important linkage zone between Yellowstone and the vast central Idaho Wildlands (read their current EIS). The Sheep Station insistence that domestic sheep must take precedence over public wildlife helps insure that the Yellowstone bears will remain on an island. I oppose this proposal because there is still no secure grizzly population in the vast Central Idaho Wildlands even though plans were prepared some 20 years ago to translocate suitable bears into Idaho. This population will be essential to link up with the Yellowstone bears and more northern bear populations to form a truly recovered meta-population of grizzlies in the Lower 48. Until we have such an Idaho population I will know that the USFWS is not serious about achieving true Yellowstone grizzly recovery and I will continue to oppose a Delisting Rule. I oppose this proposal because it will grant the states the right to begin to systematically target grizzlies attempting to recolonize former occupied habitat outside of a "Demographic Monitoring Area" for trophy sport hunts and this will guarantee that true grizzly recovery will be stopped in its tracks. A wide ranging top-level opportunistic omnivore such as the grizzly can not be turned over to the provincial interests of the livestock driven agendas of the state game departments of Wyoming, Idaho and Montana. I oppose this proposal because it does not take into account the unavoidable declining food resources in the Yellowstone core that will accompany the global climate change that is now underway. The grizzlies are adaptable but we must give them the room to adapt in the face of climate change. The State of Wyoming has no intention of giving them that room. The best scenario that this will result from the Delisting Rule is maintenance of a relic population of bears but it can not and will achieve true Yellowstone grizzly bear recovery. The bears must be allowed to disperse into all biologically suitable habitat. An example--The Wyoming Range likely has some of the best bear habitat in the Greater Yellowstone Ecosystem. Because of livestock political power the State of Wyoming considers any bears who attempt to recolonize this superb habitat to be expendable and, beyond doubt, they will be high on the list for trophy, sport hunts. To repeat--to turn management of the Yellowstone grizzlies over to the states will assure that all the investment of time and money up to now toward recovering these bears will be for naught and we will have snatched "defeat right out of the jaws of victory". Now is not the time to turn back. I oppose this premature Proposed Rule for Yellowstone Grizzly Bear Delisting from the Endangered Species Act.	FWS-R6-ES-2016-0042-1109	

The GYE area designated for bear management is but a small island. Dreams, research and plans for a corridor to link bear populations have been discussed for years. Plans for hunting are moving us in the wrong direction. Although it is hoped some lucky bears might be able to move out of the area with some hunting restrictions, this too is speculative with no guarantees.	Factor A	See Attached Attachments Patten Eva	FWS-R6-ES-2016-0042-1227	
Climate change effects on Yellowstone's grizzlies are dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. A	Factor A	I oppose delisting of the Yellowstone population of grizzly bears. The species should not be removed from the Federal List of Endangered and Threatened Wildlife. In 2015, approximately 70 bears died. This represents about 10% of the total population for the slowest reproducing mammal in North America. This mortality rate is not sustainable. The 10% rate occurred even with federal protection of the Threatened and Endangered Species act. Removing such protection and placing it with Idaho, Montana, and Wyoming is incompatible with a sustainable population. These three states have clearly demonstrated hostility to co-existence with large carnivores and seem to view them only as unwanted pests or a commodity for revenue through hunting licenses, etc. Demonstrated, real-world sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Climate change effects on Yellowstone's grizzlies are dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. Four critical foods make up the diet of grizzlies in the Yellowstone ecosystem: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. The expanding range of Yellowstone's grizzlies is depicted in The Rule as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). A more reasonable hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement for "best science" as required by law. The grizzly population of the Yellowstone ecosystem is isolated from all other grizzly populations (pp. 13190-13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the	FWS-R6-ES-2016-0042-5355	
Predation was a part of doing business as a rancher and if you were not smart enough or creative enough to deal with predators, then you had no business being a rancher.	Factor A	It is with great sadness and frustration to hear about the possible de-listing of grizzly bears in the greater Yellowstone eco-system. First I would like to address the issue from the perspective of a native of Wyoming. My life began on a large ranch nestled along the Beartooth Mountains reaching into Sunlight Basin north of Cody, WY close to the Montana border. During my childhood, I encountered an extraordinary plethora of wildlife including the grizzly. My parents taught me the value and necessity of living with, not against nature. In order for humanity to have a connection to the earth, there must be respect and love for all things wild and free. Predation was a part of doing business as a rancher and if you were not smart enough or creative enough to deal with predators, then you had no business being a rancher. And true to their wisdom, we experienced very little predation. More livestock was lost to injury and illness than wildlife predation. Throughout all my childhood years, I learned to understand wildlife and respect their ways. Ultimately learning how to alter my own behavior in order to interact safely. Not a hardship, sometimes a short delay or detour, but nothing that would ever cause my parents a willingness to take the life of a bear, coyote, cougar, bobcat, fox, etc. for convenience's sake. Fast forward to my life as a wildlife biologist and it is with a grateful heart that they taught me the value of all nature and it's ways. It is from their lifelong commitment to harmony, balance, and respect for all life that I long to protect the last vestiges of the wild. It is poor science that calls for the slaughter of these magnificent creatures. And slaughter it will be. Montana's plan is to charge only \$50 for in state licenses and a \$1,000 for out-of-state. These low costs will ensure their decimation, not to mention the fact that they are not used to being hunted making them an easy target. The time it takes for them to mature sexually and only reproduce every two to three years will greatly increase their reduction should de-listing occur. Their value is far greater alive than on someone's wall or under their feet. I recall a funny comment made to Yellowstone rangers about training the bears better so that visitors will be able to see them. Not so funny when you think about how much money wildlife engenders for the park and the surrounding businesses. And bears are iconic, everyone who enters a park where they remain wish to see one and to feel their wildness. There is no good reason to de-list these bears and especially not for political maneuvering. It is our responsibility, collectively to keep these icons safe. As anyone who works in science and law enforcement can tell you, the amount of "Shoot, shovel, and shut up," has an already significant impact in every aspect of wildlife. We must not allow the wanton destruction of grizzlies a further opportunity to take hold. Stand firm in choosing to retain the grizzly on the endangered species list where they at least have some protections. Thank you for your time and consideration.	FWS-R6-ES-2016-0042-5376	

Climate change and it's impacts on grizzly bear habitat, behavior and food selection is perhaps the greatest threat to the Yellowstone grizzlies. These threats and potential impacts are not yet fully understood. With traditional and critical food sources such as whitebark pine nuts, cutthroat trout, army cutworm moths, wild berries, elk and bison already on the decline, grizzlies are already wondering farther and into new territory in search of other food. This puts them in increasing conflict with humans, which means increased mortality for bears. I do realize that grizzly bears are adaptable, opportunistic omnivores, but the impacts of them adapting to new food sources has not been adequately addressed and is not yet fully understood. That, combined with a growing human population and other associated threats to grizzly habitat, adds up to some serious and legitimate concerns about the future of Yellowstone grizzlies.	Factor A	While I greatly respect, appreciate and applaud your tremendous and successful efforts to help Yellowstone grizzly bear populations recover from the threat of extinction, there are too many legitimate concerns -- voiced by some very prominent grizzly bear biologists, managers and other experts -- to remove the Yellowstone grizzly population from the Endangered Species Act at this time. I urge you to err on the side of caution and ensure these concerns and threats regarding grizzlies are better understood and dealt with before you delist them. Climate change and it's impacts on grizzly bear habitat, behavior and food selection is perhaps the greatest threat to the Yellowstone grizzlies. These threats and potential impacts are not yet fully understood. With traditional and critical food sources such as whitebark pine nuts, cutthroat trout, army cutworm moths, wild berries, elk and bison already on the decline, grizzlies are already wondering farther and into new territory in search of other food. This puts them in increasing conflict with humans, which means increased mortality for bears. I do realize that grizzly bears are adaptable, opportunistic omnivores, but the impacts of them adapting to new food sources has not been adequately addressed and is not yet fully understood. That, combined with a growing human population and other associated threats to grizzly habitat, adds up to some serious and legitimate concerns about the future of Yellowstone grizzlies. There are also other, legitimate concerns about how state management of grizzly bears might impact the ability of grizzly bears to expand through critical linkage zones and eventually connect with other populations to help ensure the long-term genetic health and viability of the Yellowstone grizzly populations. Until we know more about the potential impacts of these serious threats to the Yellowstone grizzlies, I urge you to err on the side of caution and not delist the population at this time. We have come a long way in the recovery of grizzly bears in the Yellowstone ecosystem; let's ensure the long-term health, viability and survival of these bears is truly secure before acting too hastily. The bears deserve more time, caution and consideration. Thank you for your consideration, and thanks again for all you have done and continue to do to help grizzly bears recover.	FWS-R6-ES-2016-0042-5387	
There are also other, legitimate concerns about how state management of grizzly bears might impact the ability of grizzly bears to expand through critical linkage zones and eventually connect with other populations to help ensure the long-term genetic health and viability of the Yellowstone grizzly populations.	Factor A	While I greatly respect, appreciate and applaud your tremendous and successful efforts to help Yellowstone grizzly bear populations recover from the threat of extinction, there are too many legitimate concerns -- voiced by some very prominent grizzly bear biologists, managers and other experts -- to remove the Yellowstone grizzly population from the Endangered Species Act at this time. I urge you to err on the side of caution and ensure these concerns and threats regarding grizzlies are better understood and dealt with before you delist them. Climate change and it's impacts on grizzly bear habitat, behavior and food selection is perhaps the greatest threat to the Yellowstone grizzlies. These threats and potential impacts are not yet fully understood. With traditional and critical food sources such as whitebark pine nuts, cutthroat trout, army cutworm moths, wild berries, elk and bison already on the decline, grizzlies are already wondering farther and into new territory in search of other food. This puts them in increasing conflict with humans, which means increased mortality for bears. I do realize that grizzly bears are adaptable, opportunistic omnivores, but the impacts of them adapting to new food sources has not been adequately addressed and is not yet fully understood. That, combined with a growing human population and other associated threats to grizzly habitat, adds up to some serious and legitimate concerns about the future of Yellowstone grizzlies. There are also other, legitimate concerns about how state management of grizzly bears might impact the ability of grizzly bears to expand through critical linkage zones and eventually connect with other populations to help ensure the long-term genetic health and viability of the Yellowstone grizzly populations. Until we know more about the potential impacts of these serious threats to the Yellowstone grizzlies, I urge you to err on the side of caution and not delist the population at this time. We have come a long way in the recovery of grizzly bears in the Yellowstone ecosystem; let's ensure the long-term health, viability and survival of these bears is truly secure before acting too hastily. The bears deserve more time, caution and consideration. Thank you for your consideration, and thanks again for all you have done and continue to do to help grizzly bears recover.	FWS-R6-ES-2016-0042-5387	
Grizzlies have low reproductive rates, and are already feeling pressures from habitat fragmentation, human pressures, and a decline in their food sources such as wild ungulates, fish and other prey species.	Factor A	Please keep protections for all 650 Grizzly Bears that remain in the Yellowstone area. If protections are lifted, they will surely be exterminated by people who will flock from all over the world for trophy hunting. Grizzlies have low reproductive rates, and are already feeling pressures from habitat fragmentation, human pressures, and a decline in their food sources such as wild ungulates, fish and other prey species. If protections are lifted, they will inevitably be pushed to the brink of extinction. They have already been exterminated from 95% of their historic range, and instead of de-listing, more studies should be done to allow them to occupy their historic range. Due to human pressures, Grizzlies are already confined to the "recovery ecosystems" if protections are removed, Yellowstone bears could be confined to extinction within our lifetimes. A Grizzly gallbladder can sell for up to \$10,000 on the black market, and the larger the gallbladder, the higher the price and in Korea, as much as \$15,000. The demand for people to kill them is extremely high and with only a few isolated populations these bears need to be protected and allowed to roam free without fear of being killed. In the Salmon River Watershed in California, one large family decimated a bear population by killing more than 200 bears (likely for the gall bladders) in one season. "It's hard for any enforcement agency to get a handle on wildlife crime. Unlike crimes against people [who report them], you usually have to catch a poacher or trafficker in the act," said Sandy Cleva, spokesperson for the U.S. Fish and Wildlife Service's Office of Law Enforcement. Please extend the comment period so that we can adequately study and offer better solutions for increasing biodiversity during this time of one of the largest extinctions on the face of the planet.	FWS-R6-ES-2016-0042-1247	

a commitment to habitat connectivity for bear migrations and genetic diversity -- managing the GYE population as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management.	Factor A	I am very wary of the proposal to delist the GYE population of grizzly bears from the federal list of endangered wildlife. If the delisting does indeed proceed forward, it should be done with great caution in favor of the grizzlies' continued chance of survival and thriving. I strongly support the following provisions in the delisting rule: -- protecting the bear's core habitat, with meaningful and enforceable habitat protections, including limits on development and roads. -- maintaining a stable population, without arbitrary reductions in the number of bears and a strong commitment from Montana, Idaho, and Wyoming to reduce conflicts between people and bears. -- a commitment to habitat connectivity for bear migrations and genetic diversity -- managing the GYE population as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. Grizzly bears are a magnificent creature and any ecosystem that has healthy populations of them is very fortunate on multiple levels. Where I live, in the North Cascades, the grizzlies are missing and we are working hard to get them back. Thank you for careful consideration of the above recommendations when moving forward in the GYE.	FWS-R6-ES-2016-0042-1250	
protecting the bear's core habitat, with meaningful and enforceable habitat protections, including limits on development and roads.	Factor A	I am very wary of the proposal to delist the GYE population of grizzly bears from the federal list of endangered wildlife. If the delisting does indeed proceed forward, it should be done with great caution in favor of the grizzlies' continued chance of survival and thriving. I strongly support the following provisions in the delisting rule: -- protecting the bear's core habitat, with meaningful and enforceable habitat protections, including limits on development and roads. -- maintaining a stable population, without arbitrary reductions in the number of bears and a strong commitment from Montana, Idaho, and Wyoming to reduce conflicts between people and bears. -- a commitment to habitat connectivity for bear migrations and genetic diversity -- managing the GYE population as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. Grizzly bears are a magnificent creature and any ecosystem that has healthy populations of them is very fortunate on multiple levels. Where I live, in the North Cascades, the grizzlies are missing and we are working hard to get them back. Thank you for careful consideration of the above recommendations when moving forward in the GYE.	FWS-R6-ES-2016-0042-1250	
Conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat. A	Factor A	I oppose the delisting of Grizzly Bears on the following grounds: 41 Native American tribes have legally opposed delisting of grizzly bears but have been disrespected and ignored by Federal and State wildlife managers. Conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat.	FWS-R6-ES-2016-0042-1359	
There are too many unknowns in climate/food source/habitat right now.	Factor A	I oppose the delisting of Grizzly Bears on the following grounds: - There are too many unknowns in climate/food source/habitat right now. - We just spent millions of dollars and it has taken 40 years to increase the bear population from 125 to 725 (demonstrating the length of time for reproduction) With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting?	FWS-R6-ES-2016-0042-1361	
The bears occupy only 2% of their original range.	Factor A	See Attached Attachments Dickinson Sarah	FWS-R6-ES-2016-0042-1349	
The expansion of their range to similar habitats in Montana and Idaho needs to be facilitated in order to assure both adequate food and integration with other grizzly populations. This is unlikely to happen with delisting.	Factor A	See Attached Attachments Dickinson Sarah	FWS-R6-ES-2016-0042-1349	
State priorities will be permitting of trophy hunting and the protection of livestock, not the creation of protected corridors for the movement of this iconic species.	Factor A	See Attached Attachments Dickinson Sarah	FWS-R6-ES-2016-0042-1349	

THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely.	Factor A	Do NOT delist the Yellowstone Grizzlies! - THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - DECLINING FOOD SOURCES: Historically bears dependent on 4 food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. These states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. - GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. Sow's will be killed and Cubs left to starve or be killed by predators. Don't delist the Grizzlies. Too many of them are being killed even with protection. There is no reason to delist them. Do you really want the states to lose millions of tourist dollars? That's what will happen because millions of people come to the Tetons and Yellowstone to see the Grizzlies. If they are hunted they won't be seen in the parks like they are now. To delist them is totally wrong on so many levels.	FWS-R6-ES-2016-0042-1366	
Habitat quality and quantity are currently unstable, and further unsustainable if delisted.	Factor A	~~Grizzly bears in the Greater Yellowstone Ecosystem have benefited greatly from ESA protections but are not even close to fully recovered in the area, and are very vulnerable. It has taken 40 years of protections to get the population where it is. Losing ESA protections means they would be immediately hunted Grizzliehunters, which would set population numbers in an immediate decline. The USFWS proposal to delist the grizzly not only puts a stop to this recovery, it will quickly QUICKLY reverse it. This would turn management of this iconic species over to the states and subject these animals to trophy hunting seasons in Montana, Idaho and Wyoming. Removing federal protections from this one small, isolated population and immediately hunting them will likely start an immediate decline back towards extinction. We do not recover species from the ESA, to delist and immediately begin hunting them. This is not the intention of the Endangered Species Act. The ESA is not a game farm plan. The purpose of the ESA is to protect and recover imperiled species and the ecosystems upon which they depend. It was designed to protect critically imperiled species from extinction as a "consequence of economic growth and development untempered by adequate concern and conservation." The U.S. Supreme Court found that "the plain intent of Congress in enacting" the ESA "was to halt and reverse the trend toward species extinction, whatever the cost. To delist species, several factors are considered: the threats are eliminated or controlled, population size and growth, and the stability of habitat quality and quantity. The threats are not eliminated nor controlled, but greater than ever. Habitat quality and quantity are currently unstable, and further unsustainable if delisted. The direct and indirect threats to the grizzly are enormous. The loss of key food sources due to climate change, slow reproductive rates, and the fact that the state plans to "manage" and "reduce" numbers through trophy hunts guarantee an unsustainable future for the species. The American public overwhelmingly wants grizzly bears protected for future generations, not killed by a few trophy hunters. Grizzly bears are a wildlife icon that have been a part of the American West and been integral to the Yellowstone region for centuries. Each year, visitors spend millions in the region, hoping to catch a glimpse of a grizzly, this beautiful and powerful symbol of our wild heritage. And as an apex predator, their presence is crucial to the health of wildlife in the Greater Yellowstone region. If the delisting goes through, the very states Wyoming, Montana, and Idaho that had their management authority over grizzlies taken away for failing to keep their populations healthy will again assume primary custodial care. Due to the extreme hostility towards wildlife predators, Wyoming's treatment of other delisted predators, namely wolves, and state policies allow wolves to be killed for any reason over 85% of the state. In the latest grizzly recovery plan, the bears are strictly protected in the core of the park, but there are very liberal hunting policies just barely outside the park and lethal control if they encounter livestock on public lands. The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year~~ Do NOT delist the Yellowstone Grizzlies! - THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - DECLINING FOOD SOURCES: Historically bears dependent on 4 food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. These states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. - GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. Sow's will be killed and Cubs left to starve or be killed by predators. Don't delist the Grizzlies. Too many of them are being killed even with protection. There is no reason to delist them. Do you really want the states to lose millions of tourist dollars? That's what will happen because millions of people come to the Tetons and Yellowstone to see the Grizzlies. If they are hunted they won't be seen in the parks like they are now. To delist them is totally wrong on so many levels.	FWS-R6-ES-2016-0042-1424	
DECLINING FOOD SOURCES: Historically bears dependent on 4 food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides.	Factor A	Do NOT delist the Yellowstone Grizzlies! - THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - DECLINING FOOD SOURCES: Historically bears dependent on 4 food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. These states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. - GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. Sow's will be killed and Cubs left to starve or be killed by predators. Don't delist the Grizzlies. Too many of them are being killed even with protection. There is no reason to delist them. Do you really want the states to lose millions of tourist dollars? That's what will happen because millions of people come to the Tetons and Yellowstone to see the Grizzlies. If they are hunted they won't be seen in the parks like they are now. To delist them is totally wrong on so many levels.	FWS-R6-ES-2016-0042-1366	

The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor.	Factor A	As a frequent visitor to the GYE, I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, (cutthroat trout and especially Whitebark Pine) diminish. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned.	FWS-R6-ES-2016-0042-1483	
Grizzly bears in Yellowstone have historically depended on four critical foods: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Both whitebark pine seeds and cutthroat trout abundance have declined significantly in the past few years. The 1988 fires, blister rust, and unprecedented bark beetle outbreak have decreased the health and abundance of whitebark pine forests in Yellowstone. Cutthroat trout have also been decimated (losses greater than 90% in many important spawning streams) with the introduction of Lake Trout into Yellowstone Lake.	Factor A	I am concerned about the removal of Endangered Species Act (ESA) protections from grizzly bears in the Greater Yellowstone region. I do not feel sufficient evidence exists to support this proposed delisting and satisfy the requirement for "best science" as required by law. It does not appear that declining food resources and climate change impacts have been sufficiently analyzed in the proposed grizzly bear delisting. Grizzly bears in Yellowstone have historically depended on four critical foods: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Both whitebark pine seeds and cutthroat trout abundance have declined significantly in the past few years. The 1988 fires, blister rust, and unprecedented bark beetle outbreak have decreased the health and abundance of whitebark pine forests in Yellowstone. Cutthroat trout have also been decimated (losses greater than 90% in many important spawning streams) with the introduction of Lake Trout into Yellowstone Lake. That evidence alone suggests a greater scientific analysis of grizzly bear food source health and abundance needs to be done prior to drastic management change. Additionally cutworm moths are not a reliable food source for grizzly bears since they migrate to high elevation talus slopes from low elevation agricultural fields where they are considered a pest. Pesticides and new farming technologies such as GMO crops could dramatically reduce this grizzly bear food source. That leaves only one of four critical food sources (25%) that appears to be stable. The impact of climate change is essentially dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." There is not enough scientific evidence to validate this statement a citation of an un-referred summary publication authored by the principle author of The Rule, Dr. Servheen. It's difficult to see that as anything but bias from an outside perspective. Additionally there is ample evidence (pp. 13216 - 13217) that the Yellowstone grizzly population has already been detrimentally affected by climate change. This evidence is similarly dismissed with the statement, "grizzly bears are adaptable, they'll do just fine," of which there is little to no supporting evidence. Not to mention that in the lower 48 states, grizzly bears occupy less than 2% of their historic range. The Yellowstone grizzly bears remain completely isolated. We need a connected population of several thousand bears for true recovery and genetic viability. Removing ESA protections from Yellowstone grizzly bears is premature and violates the requisite principle of "best science" as required by law.	FWS-R6-ES-2016-0042-1513	
Declining food resources due to climate change must figure into the decision-making. Whitebark pine, a grizzly staple, is in rapid decline, as are cutthroat trout. Although the Rule justifies delisting based on carrying capacity of the GYE, the food resource decline within the GYE, again stresses the importance of corridors into other ecosystems where grizzlies can thrive and genetically disperse.	Factor A	I am very much opposed to the delisting of the GYE grizzly. Delisting and turning management of grizzlies over to the states, will ultimately lead to trophy hunting, which this genetically isolated population cannot withstand. Wyoming, especially, has already geared up for trophy hunting, and bears like 399 who draw tourist money and who also wander in and out of NPs are sitting ducks. A specific outfitter has already stated that he will lie in wait for 399 to cross the park boundary and shoot her, for no reason other than she is too famous. Wildlife corridors are necessary before GYE grizzlies are genetically safe, and establishing corridors takes time, and has a long ways to go. Americans in general, oppose this delisting. Declining food resources due to climate change must figure into the decision-making. Whitebark pine, a grizzly staple, is in rapid decline, as are cutthroat trout. Although the Rule justifies delisting based on carrying capacity of the GYE, the food resource decline within the GYE, again stresses the importance of corridors into other ecosystems where grizzlies can thrive and genetically disperse. A retired AF Colonel friend of mine who passed away recently at the age of 92, lived long enough to witness the delisting of the wolf, another political rather than scientific decision. He said to me, "Vicki, if you want to understand the reasoning behind something that makes no sense, follow the money trail." Delisting the grizzly, just as the delisting of the wolf, is based on political and monetary pressure, and has little to do with scientific justification, of which there is none. The recent announcement of the illegal shooting of Scarface, bear #211 last November, is an example of how badly grizzlies are presently managed. If you want to catch a poacher, you have to announce a poaching immediately, not five months after the fact. There will certainly be more of this if states are allowed to manage grizzlies and start trophy hunting. I think it is disgraceful the way this event was handled, and I think it is WAY too early to consider delisting the GYE grizzly.	FWS-R6-ES-2016-0042-1545	
4. In addition to habitat loss, the backcountry is seeing increasing use as human populations rise in the area, meaning there is increased chance of human encounters, leading to more grizzly deaths.	Factor A	See attached file Attachments Comment on Grizzly Bear Delisting	FWS-R6-ES-2016-0042-1618	

6. Whitebark pine has significantly declined, research showing moderate to severe mortality within 82% of whitebark's distribution in the Greater Yellowstone area, potentially a severe impact on food sources. Even those researchers who say the adaptable griz can find other food sources note that the loss of whitebark pine will drive grizzlies to lower elevations during the fall, increasing potential for human encounters, this during hunting season	Factor A	See attached file Attachments Comment on Grizzly Bear Delisting	FWS-R6-ES-2016-0042-1618	
Grizzlies are already losing a major part of their food supply, the Whitebark pine nut, which puts them at serious risk for malnutrition and disease. Also, much of their feeding sources are in wide open areas, and delisting them will only serve to make them easy targets for game hunters and trophy shooters, putting them at serious risk for ultimate demise.	Factor A	To FWS - regarding proposed rule to remove Yellowstone's grizzly bears from the Federal List of Endangered and Threatened Wildlife: Grizzlies are top predators, and are absolutely essential for keeping the Yellowstone ecological system intact. Scientists know that grizzlies are an "indicator species", and that their health and viability are crucial for a thriving ecosystem in Yellowstone. Grizzlies are already losing a major part of their food supply, the Whitebark pine nut, which puts them at serious risk for malnutrition and disease. Also, much of their feeding sources are in wide open areas, and delisting them will only serve to make them easy targets for game hunters and trophy shooters, putting them at serious risk for ultimate demise. In addition, their isolation in Yellowstone deprives them of fresh genetic input, which leads to weakness and compromised health of future generations. Instead of removing these grizzlies from the Federal List of Endangered and Threatened Wildlife, there should be an all-out effort to permanently open up safe corridors so they can travel out of the park from Yellowstone through to central Idaho and on up to the Yukon, and back. Every effort should be made to establish this. It is imperative that you DO NOT delist these bears.	FWS-R6-ES-2016-0042-1652	
These majestic animals belong, are needed for a healthy eco-system and deserve our protection on their land!!	Factor A	I oppose delisting the Greater Yellowstone Grizzly population. These majestic animals belong, are needed for a healthy eco-system and deserve our protection on their land!! Grizzlies do not produce as quickly as other species, hunters will kill the young and most likely the sows (mothers). Unlike predators that seek out the weak and sick, "Hunters" will also seek out the best & healthiest specimens to kill and "proudly" display and brag of their murder. They will bait or lure them from the park, either by themselves or with the help of outfitters to kill. The population will be back to endangered status in no time and the very animals such as grizzlies and wolves that people come to see - will once again be extinct. PLEASE for once, listen to what the American people say - NOT the Koch brothers, the oil companies and other big corporate interests!! Do what our founding fathers would have and REPRESENT the American people for once!! DO NOT DELIST Grizzlies. Thank you!!	FWS-R6-ES-2016-0042-1655	
I write this letter in concern to the revision of 50 CFR 17.11 which would remove the Greater Yellowstone Ecosystem (GYE) grizzly bear to a distant population segment (DPS) from the Federal List of Endangered and Threatened Wildlife. I think this is a great mistake. For example, it has been proven that grizzly bears are an umbrella species, meaning that because they require a large habitat, this protects other organisms living in the same habitat as the grizzly bears. I understand that long-term conservation monitoring will be taken place, however, this would only monitor the grizzly bear population and not the different organisms that live in the habitat of the grizzly bears. According to this proposal, the Interagency Grizzly Bear study Team (IGBST) will continue to monitor habitat standards and adherence to the 1998 baseline. Although, a continuation to monitor the abundance, and distribution of grizzly bear foods will still just focus on one species. Like I mention earlier, the grizzly bear being on the list of endangered species has allowed many organisms to continue to stay in their habitat.	Factor A	My name is Guadalupe Cordoba. I am currently a senior at St. Mary's University. I write this letter in concern to the revision of 50 CFR 17.11 which would remove the Greater Yellowstone Ecosystem (GYE) grizzly bear to a distant population segment (DPS) from the Federal List of Endangered and Threatened Wildlife. I think this is a great mistake. For example, it has been proven that grizzly bears are an umbrella species, meaning that because they require a large habitat, this protects other organisms living in the same habitat as the grizzly bears. I understand that long-term conservation monitoring will be taken place, however, this would only monitor the grizzly bear population and not the different organisms that live in the habitat of the grizzly bears. According to this proposal, the Interagency Grizzly Bear study Team (IGBST) will continue to monitor habitat standards and adherence to the 1998 baseline. Although, a continuation to monitor the abundance, and distribution of grizzly bear foods will still just focus on one species. Like I mention earlier, the grizzly bear being on the list of endangered species has allowed many organisms to continue to stay in their habitat. In the book "Spine of the Continent: The Race to Save America's Last, Best Wilderness" by Mary Ellen Hannibal emphasize the importance of having connectivity. Animals need corridors to do their natural migrations and potential connect different populations of grizzly bears. Grizzly Bears need a large habitat to gather food, sleep, and mate. If grizzly bears are limited their habitat, we might see habitat destruction because the connectivity of grizzly bears to their natural habitat could have a major effect on other organisms. For example, when grizzly bears dig for food they aerate the soil, and while eating salmon they make food available for scavengers and transfer rich nutrients from the river to forest. I think this proposal does not take into account the full connections that the grizzly bears have with other species and the ecosystem. When a land is divided into different small patches of land, fragmented, large animals like the grizzly bears would not be able to survive. In a study by William Newmark in 1987 he said that even though a species is protected, it will not survive if they are not able to move freely. Having boundaries just limits the connectivity of the animals and affects their population and others species who depend on the habitat of the larger species like the grizzly bears. The grizzly bears being part of the Endangered and Threatened list allows the grizzly bear to have the large habitat they need. Also, as humans, we need to think about the ethics regarding the ability we have to control and alter the habitat of so many species. Aldo Leopold in his book, "A Sand County Almanac" suggested that we should appreciate and protect wildlife because of its intrinsic value. That we should think of how great nature is because its nature. Also, we should think of the cultural diversity of the natural systems aside from what resources nature has to offer for people. He says that instead of trying to be the owners of nature we should be the stewards of nature. We should enjoy being part of nature, the home to all living organisms including humans. If we look at it this way, we should try to protect the grizzly bears because of their importance to the ecosystem.	FWS-R6-ES-2016-0042-1667	

In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally.	Factor A	No one really knows how many grizzlies are in the GYE. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council stated: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally.	FWS-R6-ES-2016-0042-1666	
As noted before, Grizzly Bears are known as a keystone and umbrella species of their systematic habitats. (Berger et al 2001) Just like the Grey Wolves in Yellowstone, even their presence affects many more species including both animal and plant life forms. Using the wolves as an example in Yellowstone, when the wolves were eliminated the whole ecosystem seemed to be dying alongside. Without wolves to control the Elk populations, the Elk overpopulated and ate or trampled many plant species. Without plant species, all the other mini-ecosystems such as the riverbanks were affected negatively as well. Though bear numbers are stable at the moment, they are faced with habitual vulnerabilities such as fragmentation and poaching. As the country develops, more and more land is urbanized and deforestation is rampant. Since the founding of our country, 90% of virgin forest has been cleared away due to human activities. (UMich) More and more roadways are built to convenience the lives of humans at the cost of roaming species. Habitat fragmentation is a somber issue often overlooked; fragmentation often leads to reduction of species richness, inbreeding, and loss of sustainability of the habitat for the animal itself. (Fahrig 2003) The concept of limited poaching is introduced especially if for self defense. However, bears are not harmful creatures and many methods can be implemented to prevent these creatures from attacking the population or the properties. The Habitat Based Recovery Criteria listed within the recovery planning are not backed with much scientific evidence; instead the bears are described as "opportunistic creatures" (USF&W)	Factor A	See attached file(s) Attachments Grizzlybears	FWS-R6-ES-2016-0042-1670	
At the very least, I would hope that the federal government would follow the lead of Governor Bullock who has stated that the bears of Yellowstone are recognizable and loved by millions and set a buffer around the park to exclude hunting.	Factor A	Thank you for the opportunity to comment on this vital issue. My wife and I are annual visitors to the Yellowstone ecosystem and revel in the opportunity to reconnect with the Wild America that is our heritage. The wild grizzly bear is our iconic image, wild, free and powerful, and the limited sightings we have are some of our most cherished. We understand that as recovery continues, there may be a need to limit their numbers as they near the limits of their acceptable boundaries. By no means do we believe the grizzly population has reached a full recovery or capacity for this ecosystem. The population is fragile, poaching and necessary kills have reached unheard of levels, and the real impact of climate change is yet to be discovered. Take time and make an informed, scientifically sound decision before delisting the bears. At the very least, I would hope that the federal government would follow the lead of Governor Bullock who has stated that the bears of Yellowstone are recognizable and loved by millions and set a buffer around the park to exclude hunting. Thank you for this opportunity.	FWS-R6-ES-2016-0042-1701	

You guys are just going to cave to the cattle industry, waning hunting clubs, gas and oil conglomerates and hateful, uneducated trophy hunters who just want to fight the system and kill everything for a head to hang on their wall and a rug to walk all over on their floor. Like they are king of the hill. They don't know how to share the miracle of nature, they have to dominate it.	Factor A	DELISTING THE GRIZZLY NOW IS NOT RESPONSIBLE! Strike #1: Grizzlies depend on four food sources of which three are unreliable do to climate change. More studies need to be done. Strike #2: The proposed rule does not address the genetic isolation of the population in the GYE and there are no plans for more wildlife corridors making connectivity impossible. Strike #3: If grizzly management goes to the states, bears will be relentlessly hunted, reversing any population gains that have been made while on the ESL. Strike #4: Grizzlies are slow reproducing mammals and this could be devastating for the population when hunters claim innocence when they accidentally shoot sows and sows with cubs. And there are many more obstacles hindering healthy bear populations. They only occupy 1% of their historic range. Why can't we give them that? Do we have to destroy all wild grizzly populations? It is a small few who want to see these iconic, majestic bears destroyed, hunted as trophies, but a much greater percentage of US citizens who are signing petitions, writing editorials, posting their displeasure about delisting on social media. PAY ATTENTION TO THE PEOPLE! THEY ARE ANGRY WITH THE DECISION TO DELIST. JUST READ THE COMMENTS! Do you not see the economics of wildlife watching? I visit the GYE at least five times a year to see wildlife and on the top of my list is the grizzly bear. If I was to stop visiting the communities (AND BRINGING MY CLIENTS, FAMILY AND FRIENDS) around Yellowstone NP/Grand Teton NP the economic loss would be thousands of dollars. And that is just me! I return over and over again, something a hunter's money does not do. Once an animal is killed, THAT IS THAT. I can watch the same bear in every season! You guys are just going to cave to the cattle industry, waning hunting clubs, gas and oil conglomerates and hateful, uneducated trophy hunters who just want to fight the system and kill everything for a head to hang on their wall and a rug to walk all over on their floor. Like they are king of the hill. They don't know how to share the miracle of nature, they have to dominate it. I am disgusted, disheartened, upset, angry and ready for the fight. WE NEED GRIZZLIES IN THE WILD. I was cheated when past generations of egotistical, uneducated men decimated wild buffalo herds. I did not get to experience seeing this spectacular phenomenon. I DON'T WANT TO CHEAT MY GRANDKIDS OF THE EXPERIENCE OF SEEING GRIZZLIES IN THE WILD. DO NOT DELIST! DO NOT DELIST! DO NOT DELIST! DO NATURE A FAVOR AND DO NOT DELIST. Thank you for taking to heart my comments. I COUNT ON YOU TO SAVE OUR NATIONS GRIZZLIES!	FWS-R6-ES-2016-0042-1710	
The principal impediment to migratory connectivity is human-caused mortality associated with livestock grazing and elk hunting. There is evidence that bear conflicts and mortality have occurred in both the Gravelly and Centennial ranges. The situation in the Wind Rivers, Wyoming and Salt River Ranges, could be similar. I suspect that livestock allotment priorities of the US Forest Service serve as management priority impediments to grizzly bear range, and thus, population expansion and stability. The matter of connectivity and wildlife conflicts should be a part of National Environmental Protection Act (NEPA) examination for all public land grazing allotment suitability examinations. These reviews should be conducted for every allotment in the Greater Yellowstone Ecosystem, prior to delisting, and the matter of conflict examined	Factor A	See attached file(s) Attachments Grizzly Bear Delisting Proposal Attn	FWS-R6-ES-2016-0042-1757	
The issue of white bark pine mortality, cut throat trout decline and pesticide-targeted moth population sustainability is showing that changing feeding habits can result in more conflicts due to shifting diet preference. This places bears at even greater even greater risk than only a few years back.	Factor A	See attached file(s) Attachments Grizzly Bear Delisting Proposal Attn	FWS-R6-ES-2016-0042-1757	
They need room to roam - greenways - which you have not provided and a place where they will not be hunted by people	Factor A	Please, do not delist the grizzlies. The FWS have failed the grizzlies since the beginning. They need room to roam - greenways - which you have not provided and a place where they will not be hunted by people that do not care about the environment and how important an apex predator is. The FWS has done enough damage. please do not delist the grizzlies	FWS-R6-ES-2016-0042-1807	
The proposed delisting does not address the genetic isolation of Yellowstone grizzlies. The Yellowstone area population gene pool is too small and is disconnected from population to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Please keep these points in mind when making any decision on delisting of the grizzly in the Yellowstone ecosystem.	Factor A	I'm writing to comment on the proposal to remove the Greater Yellowstone Grizzly Bear from the Federal List of Endangered and Threatened Wildlife. As we saw with Scarface, grizzly bears will be killed even if they remain protected. In 2015, a record number of Yellowstone bears were killed. It is premature to delist now. We should wait and see how these removals impact the overall population. If hunting is permitted, there should be a moratorium until states can absolutely prove they can manage the grizzly population to keep it at least at current levels. There must be buffer zones around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park. As you know, grizzlies are one of the slowest reproducing mammals. As a result, loss of several females in a year would be devastating for the population. Most Americans oppose delisting of the grizzly bear. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The proposed delisting does not address the genetic isolation of Yellowstone grizzlies. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Please keep these points in mind when making any decision on delisting of the grizzly in the Yellowstone ecosystem.	FWS-R6-ES-2016-0042-1820	

Additionally, It is worrisome and inappropriate that the loss of habitat for grizzlies due to human encroachment is not being considered part of the factor in maintaining quality numbers of grizzlies over the long term.	Factor A	To Fish and Wildlife Services and others concerned with this issue, I am writing to oppose Grizzly delisting and hope that the bigger picture of scientific evidence will be considered. This consideration is premature on many scientific levels. We have not fully gained the knowledge and evidence that the declining amount of white bark pine, cutthroat trout and other food sources for grizzly bears will not affect their long-term survival and numbers. Additionally, it can not be underestimated that the effects of climate change will continue to poorly affect the numbers and longevity of grizzly bears in the lower 48. Grizzly numbers are still at a level of uncertainty and are susceptible to many variables from year to year. The fact that nearly 60 bears were killed alone in 2015 while still protected exemplifies this instability. (known deaths) I am greatly disturbed by the recent decision of the FWS to very belatedly notify the public of the killing of a grizzly bear that occurred in November 2015. This is atrocious. The public deserves answers, facts and timely information rather than politics. Decisions like this do not provide for public trust and faith in the various agencies or states to protect grizzlies if delisted. Additionally, It is worrisome and inappropriate that the loss of habitat for grizzlies due to human encroachment is not being considered part of the factor in maintaining quality numbers of grizzlies over the long term. Human-bear conflict most often results in the dispatching of the bear...to delist the grizzly ignores the fact that grizzly bears need large amounts of habitat to exist and thrive. Their protection under the ESA allows for better management and public restraint and education when human-bear ranges overlap. These are just a few of the reasons against de-listing. Scientifically, ethically, and environmentally it is premature and unsound to delist the grizzly bear.	FWS-R6-ES-2016-0042-1827	
Thanks to the protections of the Endangered Species Act, she noted their number today has risen slowly to around 700. But she cautioned, that their future isn't secure yet because they face so many threats to their survival - two of their four major foods have all been but wiped out, due to climate change, disease and invasive species and they may be killed if they prey on livestock in their increasingly difficult search for food.	Factor A	Recently, renowned conservationist Dr. Jane Goodall delivered remarks before members of the House Natural Resources Committee in Washington DC. She spoke of her love for famous Jackson Hole Grizzly 399 and proposals to remove Greater Yellowstone Grizzlies from federal protection under the Endangered Species Act. Not surprisingly, Dr. Goodall was shocked to hear about the proposal and found it "hard to believe". She said that she's met Grizzlies in Yellowstone and also up close in Alaska. Like so many people she was deeply impressed. For her, she said the Grizzlies, along with the wolf, symbolize the American wilderness-the land and the animals she read about as a child. She stated that she has learned a lot about them-their remarkable intelligence, their differing personalities, their close family bonds and their relationship with the land. "Many Native American tribes revere them - think of them as teachers". She credited the Endangered Species Act in 1975 for saving the Grizzlies of the Greater Yellowstone Ecosystem who numbered less than 150 individuals at that time. Thanks to the protections of the Endangered Species Act, she noted their number today has risen slowly to around 700. But she cautioned, that their future isn't secure yet because they face so many threats to their survival - two of their four major foods have all been but wiped out, due to climate change, disease and invasive species and they may be killed if they prey on livestock in their increasingly difficult search for food. During her visit to Yellowstone, with photographer Tom Mangelsen, she met the famous mother known only as 399 and her triplets. Many of the thousands of people who flock to Yellowstone are hoping to meet her and she saw how calm 399 was amongst the crowds. She noted that 399 and the other Yellowstone Grizzlies boost the tourist industry which does wonders for the economy - "and that is over and above the intense delight that people feel when they encounter 399 and the other Grizzlies of the area". Unfortunately, she learned that 399 is one of the bears who sometimes moves out of the protected area in search of food. Dr. Goodall fears that if the Grizzlies are delisted and the state opens a hunting season 399 might be shot by a Trophy Hunter "so that her head could be mounted on a wall-her skin laid on the floor for human feet to trample". At the thought of this tragic reality Dr. Goodall poignantly commented, "I think many hearts would break-I know mine would." Please do not break the hearts of millions of people by delisting these beloved and noble Bears.	FWS-R6-ES-2016-0042-1819	

A less well understood but equally grave danger is that Yellowstone grizzlies live on what is effectively an island. Island populations are subject to inbreeding and hence lowered reproduction ratesand grizzlies are already among the least fecund mammals, rarely producing young until the age of five, with litters of two cubs most common, typically three years apart. When island populations dip, they cannot be resupplied by adjacent populations, because there aren't any. The study of island biogeography has found that islands always have higher rates of extinction.	Factor A	I am the author of THE GRIZZLY BEAR, first published by Alfred A. Knopf in 1984 and republished several times, most recently in 1997 by Lyons and Burford. It was called "a classic" by the New York Times and is still considered the definitive book on the Yellowstone grizzly bear population. I am also a former chairman of the Greater Yellowstone Coalition as well as a former partner in a cattle ranch within the Greater Yellowstone Ecosystem which is seasonally occupied grizzly bear habitat. The proposed end of federal protection of the Yellowstone grizzly bear is trumpeted in some quarters as one of the great triumphs of the Endangered Species Act. In fact it would be a spurious victory. The most salient argument against delisting is the collapse of the grizzlies' food system. By far the most important source of nutrition for the bears has been the seeds of the whitebark pine tree, but the whitebark is under a double attack. The native mountain pine beetle has historically been kept in check by periodic deep freezes, but there haven't been any of those for years now. The other attacker is the deadly, non-native white pine blister rust. More than 95 percent of the whitebarks are now dead. Until recent years, early each summer there were vast runs of spawning cutthroat trout up the tributaries of Yellowstone Lakea high-fat feast for grizzlies. Since the illegal introduction of non-native lake trout, however, which feed on juvenile cutthroats, the spawning runs are down by 90 percent. A less well understood but equally grave danger is that Yellowstone grizzlies live on what is effectively an island. Island populations are subject to inbreeding and hence lowered reproduction ratesand grizzlies are already among the least fecund mammals, rarely producing young until the age of five, with litters of two cubs most common, typically three years apart. When island populations dip, they cannot be resupplied by adjacent populations, because there aren't any. The study of island biogeography has found that islands always have higher rates of extinction. Grizzlies are notoriously hard to count, and some independent scientists have challenged the studies on which the government has based its population assessmentsnot only of present numbers but of projected ones. Their analyses indicate that the population is already declining. The increasingly far-right legislatures of Idaho, Montana, and Wyoming are thirsty for the bear management control that would come to their fish and game departments with delisting the Yellowstone grizzly. The bears would be hunted. Their numbers and the extent of their range would inevitably be reduced. Opponents of delisting cite what happened when Yellowstone's gray wolves came under state management. Montana has been pretty good, but conservationists claim that Idaho's approach, at least in some parts of the wolves' range, has been not far short of outright slaughter, and Wyoming decreed that outside a zone encircling Yellowstone and its adjacent protected lands, the rest of the state would be a year-round free-fire zone. Grizzly bear management by these three states, based on their previous behavior, seems likely to reduce an already declining population with a declining food base. The only way Yellowstone's grizzly bears can be expected to thrive in the long run is for their ecosystem to be connected by a habitat corridor to other grizzly populationsthe one centered on Glacier National Park and others up the Rocky Mountain chain to Alaska. That is still possible, if the connecting lands are protected, which they are not today. To take	FWS-R6-ES-2016-0042-1832	
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Proponents of delisting signal current population estimates indicating that the park may be at or near ecological carrying capacity for grizzly bears: â€¢ As of 2014, approximately 150 grizzly bears with home ranges wholly or partially in park. â€¢ As of 2014, 674â€”839 grizzly bears in Greater Yellowstone. https://www.nps.gov/yell/learn/nature/gbearinfo.htm These statistics might justify delisting the bears were it not for the dramatic decline of two of the grizzliesâ€™ most vital food sources: white bark pine nuts and cutthroat trout. The rapid growth in the white bark pine beetle population is decimating the current stands of white bark pines on which the bears depend. Unable to depend on the supply of pine nuts, the grizzlies are increasingly dependent upon cutthroat trout, but the Yellowstone population of cutthroat trout has declined due to numerous factors, such as competition from non-native species of fish and parasites. The impact of this reduction in their food source on the bears has not been assessed, and until that assessment has been performed and addressed, it is premature, and possibly unwise, to reduce the bear population further through delisting.	Factor A	See attached file(s) Attachments Angresano Grizzly Request	FWS-R6-ES-2016-0042-1840	
A further threat to the grizzliesâ€™ food supply is the probability that the elk population may decline due to increased building of vacation homes throughout the Yellowstone ecosystem. This alteration of the ecosystem may cut off the elkâ€™s access to their migration routes â€” potentially reducing the availability of yet another vital food source for grizzlies. http://www.npr.org/2016/04/18/474658536/is-yellowstone-national-park-in-danger-of-being-loved-to-death	Factor A	See attached file(s) Attachments Angresano Grizzly Request	FWS-R6-ES-2016-0042-1840	
There are to many for what forest and food is available.	Factor A	The grizzly bears need to be delisted. There are to many for what forest and food is available. Look how many people have been killed in the last 5 years, by grizzly bears. Look at how many bears are relocated every year. They take them from one place to another. Then when they get in trouble there, they bring them back. They have no fear of humans. There numbers have over exced there goal since they was listed. We live with the bears, and the Wyoming Game and Fish should have control over the grizzlyls to manage them like they should.	FWS-R6-ES-2016-0042-1931	
he x shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. x Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." x The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. x	Factor A	Thank you for allowing public comment on this Proposed issue: The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Plus, the GYE is an isolated "island" where species diversity is limited because corridor for new genetic are shut down because of human inter mention (i.e. road, ranches, etc) GYE region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. FWS will stay involved with protecting the grizzly population after delisting. In the form of a leaked memo, the 3 states said that they will open up trophy hunting seasons for the bears. I believe that opening such seasons is a prime motivation for the states in pushing for de-listing. If you look at what each state is doing to manage wolves, it is clear that they will only allow the minimum numbers of individuals to survive, nothing more. Relying on state agencies, that have shown a deep hatred towards any predator shall NOT be allowed or given a chance to manage a endangered species. FWS claim that they will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. To shoot FWS will have spent more than 40 years recovering the grizzly population, only to see it	FWS-R6-ES-2016-0042-1922	

Continued domestic sheep grazing on USDA public lands in the Centennial and Gravelly Mountains of Southwest Montana have resulted in Grizzly Bear deaths and are prohibiting the genetic connection between the Northern Continental Divide and Yellowstone Ecosystems.	Factor A	While I was the BLM Dillon Field Manager, I served as the Montana BLM representative to the IGBC Yellowstone Ecosystem Subcommittee for ten years (2002-2012). Great strides have been made in increasing the Yellowstone sub population of Grizzly Bears, however more work is needed to reduce threats to this population of Grizzly Bears. Reduced high value food supplies due to the loss of Yellowstone Cutthroat Trout, Whitebark Pine Nuts, and the significant reduction in the Yellowstone Northern Elk Herd have decreased the upward trajectory of this population of Grizzly Bears. In fact the population increase has been static for the last ten years while human caused threats identified have not been addressed. This has resulted in increased mortality that cannot sustain the population long term. Increased human population, especially to the north and east of Yellowstone National Park has resulted in increased hunting pressure on Elk resulting in Grizzly Bear deaths due to conflicts with Grizzly Bears during hunting season. Continued domestic sheep grazing on USDA public lands in the Centennial and Gravelly Mountains of Southwest Montana have resulted in Grizzly Bear deaths and are prohibiting the genetic connection between the Northern Continental Divide and Yellowstone Ecosystems. Sport hunting of the Yellowstone Grizzly Bear cannot be justified due to increase risks that are not addressed and increasing mortality of these bears. Funding to address these increasing risks are not available to either the three states nor to the federal land management agencies where these bears reside. Nor is it likely that funding will be made available to the states or federal land management agencies in the future to address these increasing risks. States don't even require hunters to carry bear spray while hunting big game in hunting units occupied by grizzly bears. Until there is a substantial increase in the efforts to reduce risks to the Yellowstone Grizzly Bear I don't believe the Yellowstone Grizzly should be delisted.	FWS-R6-ES-2016-0042-1958	
It took 40 years to get a little over 700 grizzly bears. If their fate is turned over to the states of Montana, Wyoming and Idaho those numbers will decrease very rapidly. If that happens, with their low reproduction rate, they may never recover. That would be a real shame.	Factor A	I strongly oppose the delisting of the Yellowstone grizzly bear. Why do you want to delist them? Their numbers have not increased in the last decade. Fifty or 60 of them are being killed each year even with Federal protection. Isn't this enough? Why do people need to trophy hunt them when so many people come to Yellowstone each year primarily to see grizzly bears? What do you think that is going to do to the economy of the border towns? It certainly isn't going to help them! The decision to delist them was reversed last time and probably will be this time if they are actually delisted. Why go through with this? reason is because it's a very bad idea. They are not ready to be delisted. It took 40 years to get a little over 700 grizzly bears. If their fate is turned over to the states of Montana, Wyoming and Idaho those numbers will decrease very rapidly. If that happens, with their low reproduction rate, they may never recover. That would be a real shame. These bears belong to the public, not to some hunters who want to mount their heads on a wall. In my opinion, this is being driven by political reasons, not by the desire to protect the grizzly bear population. I believe that the hunters and ranchers have exerted undue influence and are driving this. Please do NOT delist the grizzly bears!	FWS-R6-ES-2016-0042-2367	
Their normal food sources are no longer readily available which has left their population flat over the past decade.	Factor A	I very much oppose removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I am a life long resident of Western Montana and believe this step would be devastating to the grizzly population. The grizzly population is still fragile and saw 61 deaths alone in 2015. Their normal food sources are no longer readily available which has left their population flat over the past decade. However, I am most concerned with the thought of these wonderful creatures becoming the next Trophy Hunter's target. It breaks my heart that those bears, watched, studied and loved by so many could end up on someone's wall - or as a rug under their feet. This will be devastating to grizzly populations. We as the human race should know better and understand just how detrimental our actions are. It's time to do the right thing - please DO NOT REMOVE the Grizzly Bear from the Federal List of Endangered and Threatened Wildlife.	FWS-R6-ES-2016-0042-2424	
Look at the ages of the bears still at Yellowstone - how many will pass due to age or sickness in the next few years? How many females are there still in breeding age? How many cubs survive each year? It's not just about the number they are at now. I don't think 770 is a large number. Nature takes care of itself.	Factor A	I really hope that you leave the Grizzly Bear on the Federal List of Endangered and Threatened Wildlife. It has taken them 41 years to grow such a small number. They are beautiful creatures. I hope to be able to see one in person one day. It is not hurting anything or anyone, except for big game hunters by leaving them and others on the list. Please take deep consideration before making any decision. Look at the ages of the bears still at Yellowstone - how many will pass due to age or sickness in the next few years? How many females are there still in breeding age? How many cubs survive each year? It's not just about the number they are at now. I don't think 770 is a large number. Nature takes care of itself. We as humans need to allow nature to take it's own course and stay out of the way.	FWS-R6-ES-2016-0042-2515	

the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers.	Factor A	I agree with the delisting of the Grizzly Bear and opening a hunting season on them. Please Reference: According to Yellowstone National Park, over the last 40 years the grizzly population there has grown from 136 to a stable population of somewhere between 674 and 839 The recovery population goal was 500 and was actually met in 1999. The grizzly bears in the Yellowstone area had been removed from the list in 2007 but in 2009 a 9th Circuit federal judge ordered that they be put back on, citing the decline of the whitebark pine tree, whose pine cone nuts were seen as a critical part of the grizzly diet. However, the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered.. Predictably, the Sierra Club and some other groups are opposing the delisting. Here are the objections listed by the Sierra Club in an August 2015 article. The growth rate of the Greater Yellowstone grizzly bear population has been flat since the early 2000s, and may be in decline. Fewer cubs and yearlings are surviving to adulthood. Fact: Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said the reason the population is leveling out is that bear density has reached the carrying capacity for the range. Fact: the number of female grizzlies with cubs in the Yellowstone ecosystem was the highest ever recorded ever counted in 2013. Grizzly bears in the Yellowstone region are completely isolated from other grizzly bear populations, both geographically and demographically, as they have been for 100 years. Fact: Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000 - also likely to be proposed for delisting), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. Existing state management plans will not protect Yellowstone grizzly bears and will not allow them to connect to other grizzly populations if they are delisted now. Wyoming, Montana, and Idaho, the three states where Yellowstone grizzly bears live, plan to immediately initiate sport hunting of grizzly bears as soon as they are delisted. Fact: Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600. Courts have ruled that the U.S. Fish and Wildlife Service must consider the overall recovery of the species as it was originally listed under the Endangered Species Act, and may not delist isolated segments of the species (such as the Greater Yellowstone grizzly population) one at a time. Fact: This is a stalling tactic. Not all courts agree on any issue, especially since judge-shopping has become a common legal tactic, especially by activists. And, of course, not all areas see population recovery at the same rate. Opponents also say that the number of human-bear contacts must be reduced before the grizzly bear can be taken off the endangered list. But precautions are already in place and allowing the population to increase by	FWS-R6-ES-2016-0042-2520	
According to many scientists, federal protection makes it more likely that bears can continue to spread out into areas known to be suitable for bears. A wider range for the bear, could bring the Yellowstone population into contact with other grizzly populations, making all of the populations less vulnerable in the long haul to starvation, disease and their top predator - man.	Factor A	The Grizzly Bear should not be removed from the Federal List of Endangered and Threatened Wildlife. The studies in the federal report recommending delisting have not undergone rigorous review by outside scientists and have not been published in scientific journals. This is considered a crucial step in validating scientific research and must not be skipped. Given the fact that the states are going to institute a sports hunt the minute the animal is removed from the list, and the death of Yellowstone's famous Grizzly, Scarface, by shotgun is proof that they can't wait for this to happen, and is another reason to leave the bear on the list. In addition to hunting bears for sport, ranchers will feel more free to kill bears and call them "nuisance animals". They must be protected from humans who will kill them simply to protect their financial interests. According to many scientists, federal protection makes it more likely that bears can continue to spread out into areas known to be suitable for bears. A wider range for the bear, could bring the Yellowstone population into contact with other grizzly populations, making all of the populations less vulnerable in the long haul to starvation, disease and their top predator - man.	FWS-R6-ES-2016-0042-2575	

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Courts have ruled that the U.S. Fish and Wildlife Service must consider the overall recovery of the species as it was originally listed under the Endangered Species Act, and may not delist isolated segments of the species (such as the Greater Yellowstone grizzly population) one at a time. Fact: This is a stalling tactic. Not all courts agree on any issue, especially since judge-shopping has become a common legal tactic, especially by activists. And, of course, not all areas see population recovery at the same rate. Opponents also say that the number of human-bear contacts must be reduced before the bears can be taken off the endangered list. But no one has ever shown that the population is increasing by a significant amount. Why rush with a decision to delist, when all indicators are of a population that is vulnerable and positioned to decline even more than they already have?" - Dr. David Mattson Dr. Jane Goodall opposes delisting also. Yellowstone's grizzly bears have lost critically important foods. Since the early to mid-2000s, two of the four key grizzly bear foods, cutthroat trout and the seeds of whitebark pine, have collapsed. Drought, climate warming and predation by a nonnative trout have nearly extirpated cutthroat trout in Yellowstone Lake. Whitebark pine have been functionally wiped out by the spread of a non-native fungal disease and by a highly lethal and unprecedented climate-driven outbreak of bark beetles. Most elk populations have also declined some dramatically-- from highs reached during the 1990s and early 2000s. There is no doubt that food resources of Yellowstone's grizzly bears have declined and put the population at grave risk, with a prognosis of more of the same to come. State-level management of large carnivores is a problem. State wildlife management agencies in the West are locked down in an Iron Triangle that serves the minority special interests of those who want to kill deer, elk, moose, and bighorn sheep (i.e., ungulates). State agencies view large carnivores primarily as competitors for ungulates that could otherwise be on the market for sport hunting licenses, which are a major source of agency revenue. Sport hunting has been used during recent decades to drive down populations of mountain lions and wolves, and, accounts for roughly 70-80% of all deaths of adult carnivores in the region. Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals. Grizzly bears are vulnerable to the excesses of state-level wildlife management. Grizzly bears have one of the lowest reproductive rates of any terrestrial mammal. A typical female will only produce 2 cubs once every 3 years, with good odds that one of the cubs will die before it reaches adulthood. Grizzly bears also have difficulty colonizing new habitats, primarily because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates, and readily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. The US Fish & Wildlife Service cannot reliably assess the status of the Yellowstone population. Grizzly bears in Yellowstone's mountainous and forested wilderness are notoriously hard to count, whether live or dead. This means that the US Fish & Wildlife Service (USFWS) has resorted to using indirect indicators together with statistical adjustments to track the population. Recent research has shown that the methods used by the USFWS are not only unreliable, but also generate spurious results that increase the likelihood that the USFWS will erroneously conclude that the population has grown, when in fact, it has declined due to excessive numbers of deaths. Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated.	FWS-R6-ES-2016-0042-2520	
Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals.	Factor A	Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals. Grizzly bears are vulnerable to the excesses of state-level wildlife management. Grizzly bears have one of the lowest reproductive rates of any terrestrial mammal. A typical female will only produce 2 cubs once every 3 years, with good odds that one of the cubs will die before it reaches adulthood. Grizzly bears also have difficulty colonizing new habitats, primarily because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates, and readily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. The US Fish & Wildlife Service cannot reliably assess the status of the Yellowstone population. Grizzly bears in Yellowstone's mountainous and forested wilderness are notoriously hard to count, whether live or dead. This means that the US Fish & Wildlife Service (USFWS) has resorted to using indirect indicators together with statistical adjustments to track the population. Recent research has shown that the methods used by the USFWS are not only unreliable, but also generate spurious results that increase the likelihood that the USFWS will erroneously conclude that the population has grown, when in fact, it has declined due to excessive numbers of deaths. Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated.	FWS-R6-ES-2016-0042-2615	

Furthermore, removing Federal protections will likely result in damaging policies, including trophy hunting, which will put strain on a species already facing a barrage of human-wildlife assaults, including rampant development and encroachment.	Factor A	I strongly oppose delisting the Yellowstone population of grizzly bears. There is enough evidence to suggest such a move is premature and that recovery is incomplete. From inadequate funding to habitat issues, there's a dearth of measures in place to ensure the continued health and recovery of these animals. Furthermore, removing Federal protections will likely result in damaging policies, including trophy hunting, which will put strain on a species already facing a barrage of human-wildlife assaults, including rampant development and encroachment. The delisting of wolves in this region showed us precisely what happens when we allow states and moneyed hunting interests to control the welfare of the wild animals in our public trust. Please do not strip this iconic species of these necessary legal protections.	FWS-R6-ES-2016-0042-2636	
Grizzly bears have one of the lowest reproductive rates of any terrestrial mammal. A typical female will only produce 2 cubs once every 3 years, with good odds that one of the cubs will die before it reaches adulthood. Grizzly bears also have difficulty colonizing new habitats, primarily because female grizzlies tend to stay in or near their mother's range.	Factor A	I OPPOSE the delisting of the Grizzly Bears. Why rush with a decision to delist, when all indicators are of a population that is vulnerable and positioned to decline even more than they already have?" - Dr. David Mattson Dr. Jane Goodall opposes delisting also. Yellowstone's grizzly bears have lost critically important foods. Since the early to mid-2000s, two of the four key grizzly bear foods, cutthroat trout and the seeds of whitebark pine, have collapsed. Drought, climate warming and predation by a nonnative trout have nearly extirpated cutthroat trout in Yellowstone Lake. Whitebark pine have been functionally wiped out by the spread of a non-native fungal disease and by a highly lethal and unprecedented climate-driven outbreak of bark beetles. Most elk populations have also declinedsome dramatically-- from highs reached during the 1990s and early 2000s. There is no doubt that food resources of Yellowstone's grizzly bears have declined and put the population at grave risk, with a prognosis of more of the same to come. State-level management of large carnivores is a problem. State wildlife management agencies in the West are locked down in an Iron Triangle that serves the minority special interests of those who want to kill deer, elk, moose, and bighorn sheep (i.e., ungulates). State agencies view large carnivores primarily as competitors for ungulates that could otherwise be on the market for sport hunting licenses, which are a major source of agency revenue. Sport hunting has been used during recent decades to drive down populations of mountain lions and wolves, and, accounts for roughly 70-80% of all deaths of adult carnivores in the region. Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals. Grizzly bears are vulnerable to the excesses of state-level wildlife management. Grizzly bears have one of the lowest reproductive rates of any terrestrial mammal. A typical female will only produce 2 cubs once every 3 years, with good odds that one of the cubs will die before it reaches adulthood. Grizzly bears also have difficulty colonizing new habitats, primarily because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates, and readily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. The US Fish & Wildlife Service cannot reliably assess the status of the Yellowstone population. Grizzly bears in Yellowstone's mountainous and forested wilderness are notoriously hard to count, whether live or dead. This means that the US Fish & Wildlife Service (USFWS) has resorted to using indirect indicators together with statistical adjustments to track the population. Recent research has shown that the methods used by the USFWS are not only unreliable, but also generate spurious results that increase the likelihood that the USFWS will erroneously conclude that the population has grown, when in fact, it has declined due to excessive numbers of deaths. Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated.	FWS-R6-ES-2016-0042-2615	

As a hunter and wildlife photographer, retired conservation officer, and regional habitat manager for the South Dakota Department of Game Fish and Parks, I feel that available scientific data indicates that the Greater Yellowstone Ecosystem(GYE) population of grizzly bears (Ursus arctos horribilis) has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). The United States Fish and Wildlife Service (Service) has also proposed to identify the GYE grizzly bear population as a distinct population segment (DPS). Therefore, the Service proposes to revise the List of Endangered and Threatened Wildlife, under the authority of the Act, by removing the GYE population. The Service has determined that the GYE grizzly bear population has increased in size and more than tripled its occupied range since being listed as threatened under the Act in 1975 and that threats to the population are sufficiently minimized. Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000 - also likely to be proposed for delisting), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. Existing state management plans will protect Yellowstone grizzly bears and will allow them to connect to other grizzly populations if they are delisted now. Wyoming, Montana, and Idaho, the three states where Yellowstone grizzly bears live, plan to jointly manage Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600. NGO's should be celebrating the delisting and not challenging because of the support from hunters, state and federal wildlife agencies for the work that they have done to restore this population. I fully support delisting this GYE population of grizzly bears.	Factor A	As a hunter and wildlife photographer, retired conservation officer, and regional habitat manager for the South Dakota Department of Game Fish and Parks, I feel that available scientific data indicates that the Greater Yellowstone Ecosystem (GYE) population of grizzly bears (Ursus arctos horribilis) has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). The United States Fish and Wildlife Service (Service) has also proposed to identify the GYE grizzly bear population as a distinct population segment (DPS). Therefore, the Service proposes to revise the List of Endangered and Threatened Wildlife, under the authority of the Act, by removing the GYE population. The Service has determined that the GYE grizzly bear population has increased in size and more than tripled its occupied range since being listed as threatened under the Act in 1975 and that threats to the population are sufficiently minimized. Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000 - also likely to be proposed for delisting), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. Existing state management plans will protect Yellowstone grizzly bears and will allow them to connect to other grizzly populations if they are delisted now. Wyoming, Montana, and Idaho, the three states where Yellowstone grizzly bears live, plan to jointly manage Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600. NGO's should be celebrating the delisting and not challenging because of the support from hunters, state and federal wildlife agencies for the work that they have done to restore this population. I fully support delisting this GYE population of grizzly bears. Great job USFWS!	FWS-R6-ES-2016-0042-2637	
If the grizzly is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back.	Factor A	US Fish and Wildlife data regarding the GYE grizzly population is suspect at best. For years, most counts of the population were in the 200 to 400 range. When de-listing was first proposed in 2007, the number suddenly shot up to 700. The methods used to arrive at that number involve a great deal of extrapolation from an extremely small sample of verified sightings. Rather than relying on US FWS data (pressured by lobbyists and hostile legislators), the public should demand research by independent organizations like The Ecological Society of America or the National Research Council. Current population estimates are untrustworthy, and the field needs good peer-reviewed analysis by objective scientists. If the grizzly is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it. And shame on you to caving to the gun nuts...	FWS-R6-ES-2016-0042-2665	
fires could affect the ecosystem of Yellowstone and wipe out necessary food supply for the Grizzlies and cause catastrophic circumstances for the bears.	Factor A	I strongly support keeping the Grizzly bears on the Endangered Species List. This year (2016) is starting to look like a bad fire season for Montana, Wyoming and Idaho. These fires could affect the ecosystem of Yellowstone and wipe out necessary food supply for the Grizzlies and cause catastrophic circumstances for the bears. Keep the Grizzlies listed.	FWS-R6-ES-2016-0042-2742	
Even if food sources are declining, wouldn't it make sense to assist the longterm survival of these and other food sources to support the population into the future. Allow natural attrition to lower numbers if necessary. Survival of the fittest, allow nature to decide. This way the viability of the species genetically will thrive. Climate change will of course affect the bear population. Maybe not in one year, but over time it will definitely have an effect. This could potentially hinder their breeding cycle and therefore numbers. For a slow reproving mammal this could be disastrous to the population.	Factor A	Katrina, Australia. Even if food sources are declining, wouldn't it make sense to assist the longterm survival of these and other food sources to support the population into the future. Allow natural attrition to lower numbers if necessary. Survival of the fittest, allow nature to decide. This way the viability of the species genetically will thrive. Climate change will of course affect the bear population. Maybe not in one year, but over time it will definitely have an effect. This could potentially hinder their breeding cycle and therefore numbers. For a slow reproving mammal this could be disastrous to the population.	FWS-R6-ES-2016-0042-2774	

The grizzly bears in the Yellowstone area had been removed from the list in 2007 but in 2009 a 9th Circuit federal judge ordered that they be put back on, citing the decline of the whitebark pine tree, whose pine cone nuts were seen as a critical part of the grizzly diet. However, the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered. Fact: Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said the reason the population is leveling out is that bear density has reached the carrying capacity for the range. Fact: the number of female grizzlies with cubs in the Yellowstone ecosystem was the highest ever recorded ever counted in 2013 .	Factor A	According to Yellowstone National Park, over the last 40 years the grizzly population there has grown from 136 to a stable population of somewhere between 674 and 839 The recovery population goal was 500 and was actually met in 1999. The grizzly bears in the Yellowstone area had been removed from the list in 2007 but in 2009 a 9th Circuit federal judge ordered that they be put back on, citing the decline of the whitebark pine tree, whose pine cone nuts were seen as a critical part of the grizzly diet. However, the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered. Fact: Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said the reason the population is leveling out is that bear density has reached the carrying capacity for the range. Fact: the number of female grizzlies with cubs in the Yellowstone ecosystem was the highest ever recorded ever counted in 2013.	FWS-R6-ES-2016-0042-2745	
The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan.	Factor A	1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. Forest Service has not yet finalized its forest plan amendments. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Under the new Bush administration rules, forest plan standards will be discretionary, rather than mandatory. That means that the Forest Service will enforce the rules if it feels like it. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to	FWS-R6-ES-2016-0042-2754	
Delisting Grizzlies would allow hunting which would undoubtedly take place heavily just outside the borders of Yellowstone, further fragmenting the population to tend to stay within the park and consequently deal with unreliable food sources, or tend to go further away outside of the borders of Yellowstone towards the periphery where best science shows that due to mostly to human and livestock conflict Grizzlies would be unable to sustain a viable population.	Factor A	Don't delist! Grizzlies need ESA protections in the GYA in order to maintain a viable population. Due to unpredictable food sources, effects from climate change and mostly the ever increasing presence of human visitation in the GYA, habitat fragmentation and livestock conflicts are already taking a toll on the grizzly population. Delisting Grizzlies would allow hunting which would undoubtedly take place heavily just outside the borders of Yellowstone, further fragmenting the population to tend to stay within the park and consequently deal with unreliable food sources, or tend to go further away outside of the borders of Yellowstone towards the periphery where best science shows that due to mostly to human and livestock conflict Grizzlies would be unable to sustain a viable population.	FWS-R6-ES-2016-0042-2778	

6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. These lands include some of the most threatened habitat in the GYE, especially by energy development in Wyoming.	Factor A	1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. Forest Service has not yet finalized its forest plan amendments. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Under the new Bush administration rules, forest plan standards will be discretionary, rather than mandatory. That means that the Forest Service will enforce the rules if it feels like it. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to	FWS-R6-ES-2016-0042-2754	
When will science prevail in this debate on whether or not to de-list the grizzly? The recovery goal was set at 500. The current population averaged between 2002-2014 is at 674! Sounds like they are recovered to me if we look strictly at numbers. Grizzlies also occupy 84% of suitable habitat in the GYE, and are expected to soon occupy the remainder. Sounds recovered to me! The number of female grizzlies with cubs was the highest ever recorded in the GYE in 2013. Once again, given the preceding information, they sound recovered to me!	Factor A	When will science prevail in this debate on whether or not to de-list the grizzly? The recovery goal was set at 500. The current population averaged between 2002-2014 is at 674! Sounds like they are recovered to me if we look strictly at numbers. Grizzlies also occupy 84% of suitable habitat in the GYE, and are expected to soon occupy the remainder. Sounds recovered to me! The number of female grizzlies with cubs was the highest ever recorded in the GYE in 2013. Once again, given the preceding information, they sound recovered to me! Again, when will we listen to those that have been given responsibility to recover this species and NOT the special interest groups that use the grizzly, the wolf, and now to a lesser (but increasing) extent, the sage grouse, to do their fundraising for them? It's not right, and should not be allowed to happen. Many people (most of whom probably don't even live near the GYE) are concerned that if de-listing is allowed to occur, that somehow State game agencies won't be able to manage the grizzly populations. This is not a valid fear. When has regulated hunting EVER reduced a population of animals to extinction...or even threatened status? Unregulated hunting, yes...regulating hunting, no! If anything, those that may be lucky enough to obtain one of the few permits that would be given out likely have high respect and regard for the grizzly. We prize and value those things in life that we are connected to. There is no greater connection to nature than to experience it first hand in a conservation NOT preservation-guided system. Please follow the science and de-list the grizzly bear. The GYE DPS is recovered beyond the original goals that were deemed sufficient to allow de-listing. What is the hold up??	FWS-R6-ES-2016-0042-2792	

Occupation of less than 2% of historic habitat, with pockets of protections from trapping and hunting, will lead to isolated populations. It's well known that, one can only continue to breed relatives, of any species, for so long before genetic problems begin to arise and threaten any sustainable population. Currently we have a prime example of this problem displayed in the Isle Royale Wolves of Michigan. Isolated on an island and without any genetic biodiversity, they display genetic mutations and are dying out, at last report, there were two left. To not allow safe travel from one preserve to another, will effectively reduce the Greater Yellowstone Ecosystem population of Grizzly Bears to such a perilous position.	Factor A	Since Grizzly Bears took years of Endangered Species protections to come back from the brink of extinction in the lower 48 states, to where we might be able to see one once again in Yellowstone, it seems far too soon to delist at this time. There are more issues than a population count can address, such as the ever changing environmental factors, coupled with bears very slow reproductive rate(2nd slowest breeding animal in the continent) and fragility of health contributing to reproduction uncertainties. Occupation of less than 2% of historic habitat, with pockets of protections from trapping and hunting, will lead to isolated populations. It's well known that, one can only continue to breed relatives, of any species, for so long before genetic problems begin to arise and threaten any sustainable population. Currently we have a prime example of this problem displayed in the Isle Royale Wolves of Michigan. Isolated on an island and without any genetic biodiversity, they display genetic mutations and are dying out, at last report, there were two left. To not allow safe travel from one preserve to another, will effectively reduce the Greater Yellowstone Ecosystem population of Grizzly Bears to such a perilous position. It's already public knowledge that Wyoming, Montana and Idaho planed all along to sell hunting tags to the less than 4% of the population that trophy hunts, as soon as delisting occurs. It was the lack of care from Wyoming's Game & Fish, that led to the listing in the first place, since they couldn't manage to stop the hunting even when the population was crashing. Why would we expect them to do any different now? We have seen how they have been unable to develop a viable Wolf Management plan, which recently led to the return of the ESA status in the state, but only after a lawsuit was initiated by conservationists had been filed and heard in the courts. Both Grand Teton and Yellowstone National Park Superintendents have publicly stated they oppose the delisting of the Grizzly Bear and they based their position upon the best available science from the experts in the field of Grizzly Bear knowledge and physical area in question, the biologists of the Parks, the best bear experts in the world. We are certain that climate changes are occurring and that science is evolving daily. We know that currently we live in what is called, The 6th Major Extinction on Earth, loosing more species in the last few years, than any there space in time since the dinosaurs died. We have also seen the Public Outrage over the trophy hunting of lions in Africa. The Yellowstone/Teton Grizzlies are just as famous, if not more so than Cecil the Lion. Ethically and morally it is wrong to kill any animal for a trophy. A 3 year study by USFWS, led by Chris Servheen, a known trophy hunter, affiliated with Safari Club International, is a biased and non-scientifically validated opinion, motivated by desire to hunt the bears. Never seen by the public, nor PEER reviewed by a panel of independent experts in the field, it is outrageously arrogant and shortsighted to accept any non-validated and transparent study. Amounting to nothing less than the Fox guarding the Hen House, this supposed study, would never make it to any Scientifically Valid Journals and probably the reason it's been hidden from anybody's view and evaluation. To think it's appropriate to take away the bear viewing opportunity of millions of people, coming from all over the world, to visit Yellowstone and Grand Teton National Parks, only to cater to the fractional less than 4% of wealthy trophy hunters, is to ignore the fact that there's a renewable	FWS-R6-ES-2016-0042-2819	
While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Å	Factor A	I do not think grizzly bears should be de-listed as an ESA. There are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, digging for grubs and hunting prey. Seeing a grizzly bear in the wild is usually an experience that remains with you for life.	FWS-R6-ES-2016-0042-2883	

Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, digging for grubs and hunting prey. Seeing a grizzly bear in the wild is usually an experience that remains with you for life.	Factor A	Grizzly deaths on rise in Montana The grizzly bear once roamed free throughout the western states, including 52 of California's 58 counties. Abundant in the Central Valley and North Bay in the 1800s, California grizzlies were also seen feasting on decaying whale carcasses along the shores of Monterey Bay. The last grizzly in California was shot by hunters in the 1920s, although it remains the familiar icon on our state flag. In state after state, ranchers and hunters wiped out local populations, until they were isolated in but a few small ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the greater Yellowstone population was estimated at 300 bears. Due to coordinated efforts by federal and state resources agencies mandated by the ESA, cooperative research, monitoring, habitat protections and regulatory mechanisms, including a strict hunting ban, their numbers have grown over the past 30 years to slightly more than 600 bears today, according to U.S. Fish and Wildlife's bear recovery coordinator, Chris Servheen. This is a success story that must be acknowledged and celebrated. However, there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their	FWS-R6-ES-2016-0042-2891	
delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die.	Factor A	I do not think grizzly bears should be de-listed as an ESA. There are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, digging for grubs and hunting prey. Seeing a grizzly bear in the wild is usually an experience that remains with you for life.	FWS-R6-ES-2016-0042-2883	

Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. Â	Factor A	I do not think grizzly bears should be de-listed as an ESA. There are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, digging for grubs and hunting prey. Seeing a grizzly bear in the wild is usually an experience that remains with you for life.	FWS-R6-ES-2016-0042-2883	
Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated some of their food sources and they have to travel farther to find food.	Factor A	Do not delist the grizzly. Climate change will have a big impact. Some scientists think the planet will only last for another one hundred years. We are destroying the planet and everything on it. What is wrong with the human race that thinks they have to kill,kill, and kill more for fun and pleasure. This is a sickness. Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated some of their food sources and they have to travel farther to find food.	FWS-R6-ES-2016-0042-2968	
Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to protect forests with large roadless tracts, and develop biological corridors between grizzly populations to ensure genetic diversity and the grizzly's long-term survival.	Factor A	Please accept these comments regarding delisitng the Greater Yellowstone population of grizzly bears. Grizzly bears once roamed throughout the Western states. In the last 150 years human encroachment on their territory wiped out local populations, until they were isolated in a few ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the Greater Yellowstone population was estimated at 300 bears. Now there are 750 in the Greater Yellowstone ecosystem. Their most important food source, nuts from the whitebark pine, is diminished by climate change. Bears' reproductive rates are slow. These bears are geographically isolated. This small population is subject to inbreeding, a serious threat to the genetic diversity of these animals. If Federal protections are lifted surrounding states will allow trophy hunting. Recently it was revealed that the iconic bear, Scarface, was shot in Montana last fall. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to protect forests with large roadless tracts, and develop biological corridors between grizzly populations to ensure genetic diversity and the grizzly's long-term survival.	FWS-R6-ES-2016-0042-2978	

Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high-elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has.	Factor A	My comment is included in the uploaded file. Attachments 5-4-16GrizzCommentFinal	FWS-R6-ES-2016-0042-2973	
The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). An alternative, and more reasonable, hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement for "best science" as required by law.	Factor A	My comment is included in the uploaded file. Attachments 5-4-16GrizzCommentFinal	FWS-R6-ES-2016-0042-2973	
Wyoming has counties who already attempt to limit the species, by laws against grizzly in county, EVEN IF THAT AREA IS FEDERAL PUBLIC LAND. This decreases habitat and connectivity, and the act of delisting will cause a sudden change - a diminution - of viable habitat. the plan does NOT take this into account.	Factor A	1. At present the Yellowstone area grizzlies do NOT have a robust connection to any larger metapopulation in order to maintain or increase heterozygosity. This means that it is SURE that the small populatino will slowly trend to homozygosity - inbreeding vulnerabilities. 2. Wyoming and other states attempt consistently to use public sport hunting to manage wildlife - this practice does NOT affect any population in a naturally-selected manner, and due to the small population, increasae the likelihood of removing the healthy members of any population. In the case of the grizzly bear, this practice would immediately cause the viable healthy component members to decrease in relation to the whole. NO state dshould be allowed to manage small predator populations, as the selection is artificial, not relating to heterozygosity, individual health, age, or any other parameter which nature normally selects - it is thus catastrophic in effect. The populatin, isolated aas it is, cannot sustain catastrophic human exploitation. Predators are not selected for human culling, attack, exploitation, and such activity would change the nature of the grizzly in ways most likely deleterious to the species and its trophic niche. 3. Wyoming has counties who already attempt to limit the species, by laws against grizzly in county, EVEN IF THAT AREA IS FEDERAL PUBLIC LAND. This decreases habitat and connectivity, and the act of delisting will cause a sudden change - a diminution - of viable habitat. the plan does NOT take this into account. 4. Yellowstone National Park where the grizzly was concentrated is high plateau, and is increasingly subject to biological effects of global warming - the longer nonfreezing days have caused a whitebark pine die-off, sending the grizzly already fromm the protected habitat outward to seek other forage. Thus the core population, relatively unknown due to the animal itself, has most likely fallen. The population estimates of Seervheen and others is almost certainly higher than actual numbers. Because of these issues, it will remain premature to delist the grizzly bear UNTIL robust habitat connectivity (with NO human take within those corridors) is created. The obama administration has consistently attempted to kill off large predators through political corruption in using political deals to get their party into office. The republican party corruptly attempts to delist endangered species for private and corporate exploitation. These are profoundly unethical reasons for present and past removals and attempts to remove large predators from ESL while they are still at numbers far lower than population modeling well-supported by experiment and consensus, suggest that a proper number of individuals preventing trend to homozygosity, are. Merely because a small group of consumptive wildlife killers desire to kill North American wildlife, is NOT a reason to rush delisting, before the population can clearly be understood to be self-sustaining over 40 or 100 more generations. The ONLY conditions under which delisting can ethically and ecologically be accepted is if NO public hunting, ever, is allowed of this species not adapted to humans with guns, fences, exclusionary rules of any sort - NO low population goals - the mandate of every state with wildlife - can be accepted, as this species has far too low a reproductive capacity. Grizzly bears must NOT be subjected to state regulation or state, county, or local law. Federal public lands must NOT be subject to such laws if predators like grizzly bears are delisted. I have been a repeated visitor to Yellowstone, the only national park in the lower 48, where	FWS-R6-ES-2016-0042-2990	

The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada.	Factor A	I oppose Yellowstone grizzly bear delisting. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Indeed, at the recent announcement of the delisting proposal, Senator Larry Craig used the opportunity to call for weakening the Endangered Species Act. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources.	FWS-R6-ES-2016-0042-3010	
While bears in Yellowstone feed on elk, bison and fish, x their most essential food source is seeds and nuts from the whitebark Å pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally Å imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the Å process. Both of these threats x increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone Å would wipe out the fungus and beetle infestations.	Factor A	While bears in Yellowstone feed on elk, bison and fish, their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. This is not the time to be delisting the Greater Yellowstone ecosystem population of grizzly bears from the Federal list of Endangered and Threatened wildlife.	FWS-R6-ES-2016-0042-3013	
While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations.	Factor A	Plans by the Bush administration to remove the grizzly bear from Federal Endangered Species Act protection threaten to reverse a 30-year recovery that has resulted in doubling the bears' population in the greater Yellowstone ecosystem. If left to "management" by the states, trophy hunting of these magnificent animals in places like Wyoming and Montana will likely follow. While their numbers have risen to more than 600 individuals, the bears are geographically isolated, and threats to their habitat and food supplies are daunting. Most environmental groups, including the Sierra Club and the Natural Resources Defense Council, as well as wildlife biologists, are urging the U.S. Fish and Wildlife Service to abandon the delisting plan as premature. The grizzly bear once roamed free throughout the Western states, including 52 of California's 58 counties. Abundant in the Central Valley and North Bay in the 1800s, California grizzlies were also seen feasting on decaying whale carcasses along the shores of Monterey Bay. The last grizzly in California was shot by hunters in the 1920s, although it remains the familiar icon on our state flag. In state after state, ranchers and hunters wiped out local populations, until they were isolated in but a few small ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the greater Yellowstone population was estimated at 300 bears. Due to coordinated efforts by federal and state resources agencies mandated by the ESA, cooperative research, monitoring, habitat protections and regulatory mechanisms, including a strict hunting ban, their numbers have grown over the past 30 years to slightly more than 600 bears today, according to U.S. Fish and Wildlife's bear recovery coordinator, Chris Servheen. This is a success story that must be acknowledged and celebrated. However, there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without	FWS-R6-ES-2016-0042-3004	

There are too many unknowns right now, regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population. Why not wait five years to see how the population is responding to these threats?	Factor A	PART 2 OF OUR OFFICIAL COMMENT: -In Wyoming, Montana and Idaho, the snow pack was average and the temperatures high for this time of year. Acknowledging the possible threat of wildfires in the Greater Yellowstone ecosystem as was experienced in Glacier National Park this past year would be catastrophic for the grizzlies. -What's the rush? There are too many unknowns right now, regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population. Why not wait five years to see how the population is responding to these threats? -Grizzly bears have one of the lowest reproductive rates of all terrestrial mammals in North America. This is due to numerous ecological factors. Grizzly bears do not reach sexual maturity until they are at least five years old. Once mated with a male in the summer, the female delays embryo implantation until hibernation, during which miscarriage can occur if the female does not receive the proper nutrients and caloric intake. On average, females produce two cubs in a litter and the mother cares for the cubs for up to two years, during which time the mother will not mate. Once the young leave or are killed, females may not produce another litter for three or more years, depending on environmental conditions. Male grizzly bears have large territories, finding a female scent difficult in such low population densities. Population fragmentation of grizzlies may destabilize their number. The grizzly bear has several relationships with its ecosystem. One such relationship is a mutualistic relationship with fleshy-fruit bearing plants. After the grizzly consumes the fruit, the seeds are excreted and thereby dispersed in a germinable condition. Some studies have shown germination success is indeed increased as a result of seeds being deposited along with nutrients in feces. This makes grizzly bears important seed distributors in their habitats. While foraging for tree roots, plant bulbs, or ground squirrels, bears stir up the soil. This process not only helps grizzlies access their food, but also increases the species richness in alpine ecosystems. An area that contains both bear digs and undisturbed land has greater plant diversity than an area that contains just undisturbed land. Along with increasing species richness, soil disturbance causes nitrogen to be dug up from lower soil layers, and makes nitrogen more readily available in the environment. An area that has been dug by the grizzly bear has significantly more nitrogen than an undisturbed area. Grizzlies directly regulate prey populations and also help prevent overgrazing in forests by controlling the populations of other species in the food chain. An experiment in Grand Teton National Park in Wyoming showed that the removal of wolves and grizzly bears caused populations of their herbivorous prey to increase. This, in turn, changed the structure and density of plants in the area, which decreased the population sizes of migratory birds. This provides evidence that grizzly bears represent a keystone predator, having a major influence on the entire ecosystem they inhabit. One of the most important points to also include is that upon further research we do NOT feel that the Endangered Species Act is being followed as far as the NECESSARY CRITERIA HAS NOT BEEN MET TO INSURE THE SUSTAINABILITY OF THE GRIZZLY IN THE GREATER YELLOWSTONE REGION in the delisting of an endangered species from the list. It is sad that this proposed delisting is political based and not science based. At this time, in reflection of the above points we have made in both part one and part two, regarding the	FWS-R6-ES-2016-0042-3155	
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While the current delisting proposal does address declines in whitebark pine, it fails to consider the significance of the whitebark pine nut to the GYE grizzly bear population.. Whitebark pine nuts are a high protein food source that once was abundant in the GYE and offered a concentrated food source requiring low caloric output. While bears are amazingly adaptable omnivores, they depend on abundant food resources to sustain them through both the months when they are active and through winter hibernation. There is no readily available alternative equivalent to the whitebark pine nut in the GYE. At the same time, grizzly habitat is being converted to residential subdivisions, ranches, and resorts, and as grizzlies set out to explore food resources in other areas, they meet up more and more with humans, often to their own demise. Army cutworm moths, another key food source that could potentially serve as an alternative lives high in the alpine, and their populations are vulnerable to climate change and exposure to pesticides.	Factor A	I oppose the delisting of the Greater Yellowstone Ecosystem grizzly bear population at this time. While the population has increased since it was listed as threatened under the Endangered Species Act, simply the number of bears in a population alone does not necessarily indicate a stable or healthy population. Stable and healthy populations are determined by genetic diversity, the proportion of females of reproductive age, population trends, and the quality of habitat. However, in the last decade, the GYE has essentially lost all its whitebark pine to the combination of the non-native blister rust and enormous outbreaks of mountain pine beetle, both exacerbated by climate change. Meanwhile, droughts and competition from non-native lake trout have extirpated westslope cutthroat trout from Yellowstone Lake. While many bear populations may adapt to climate change fairly easily, the GYE grizzlies are losing so many crucial food resources at the same time. Grizzlies are among the slowest reproducing land mammals in North America, and it can take a long time for declining populations to recover, especially with decreasing food resources. Due to declines in key food sources and with loss and degradation of available habitat, I oppose the removal of the GYE grizzly population from the list of threatened species at this time. While the current delisting proposal does address declines in whitebark pine, it fails to consider the significance of the whitebark pine nut to the GYE grizzly bear population.. Whitebark pine nuts are a high protein food source that once was abundant in the GYE and offered a concentrated food source requiring low caloric output. While bears are amazingly adaptable omnivores, they depend on abundant food resources to sustain them through both the months when they are active and through winter hibernation. There is no readily available alternative equivalent to the whitebark pine nut in the GYE. At the same time, grizzly habitat is being converted to residential subdivisions, ranches, and resorts, and as grizzlies set out to explore food resources in other areas, they meet up more and more with humans, often to their own demise. Army cutworm moths, another key food source that could potentially serve as an alternative lives high in the alpine, and their populations are vulnerable to climate change and exposure to pesticides. I applaud the conservation and management efforts that are successfully moving the Greater Yellowstone grizzly population toward recovery, but delisting the population at this time is premature. Attachments Comment GYE Grizzly	FWS-R6-ES-2016-0042-5415	

Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. For the future survival of this isolated population occupation of additional habitat is crucial to their long-term survival. In this case, size does matter! Additional habitat will likely incorporate additional diversity of habitat types and harbor a greater variety food sources for grizzlies. Providing additional habitat to these large carnivores with enormous territorial needs is essential to their long-term survival .	Factor A	I live within the Greater Yellowstone Ecosystem (GYE) and am apposed to delisting grizzly bears in the GYE for the following reasons: 1. Fact is, no one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services computer generated numbers. But, what we do emphatically know is that at least 60 grizzlies died last year and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest reproductive rate of any mammal in the GYE. The continuation of such high mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work is needed in the GYE to prevent many of unnecessary grizzly deaths before this population can be safely delisted. Such actions as requiring ranchers to relocate their garbage and carcass dumps to secure county facilities, the use of bear-proof garbage cans in communities within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for public land users, and stiffer penalties for illegal killings need to be employed within the GYE prior to grizzlies being delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate grizzlies from other populations into the GYE to improve genetic diversity, but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat and prevent them from colonizing other lands in which they were originally found. This "discouragement" will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of the land grizzlies would be "discouraged" from is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. For the future survival of this isolated population occupation of additional habitat is crucial to their long-term survival. In this case, size does matter! Additional habitat will likely incorporate additional diversity of habitat types and harbor a greater variety food sources for grizzlies. Providing additional habitat to these large carnivores with enormous territorial needs is essential to their long-term survival. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout, and even army cutworm moth populations (due to Midwest famers spraying the larvae with insecticides) have all been noted. These high calorie food deficits represent a severe loss for those grizzlies that once feasted on these nutritional foods. More research is needed to determine how the loss of these food sources (and likely others) will impact the future GYE grizzly population. Add in drought and climate change and much more.	FWS-R6-ES-2016-0042-3124	
3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout, and x even army cutworm moth populations (x due to Midwest famers spraying the larvae with insecticides) have all been noted. These high calorie food deficits represent a severe loss for those grizzlies that once feasted on these nutritional foods . More research is needed to determine how the loss of these food sources (and likely others) will impact the future GYE grizzly population. Add in drought and climate change and much more information needs to be obtained to determine how all these factors will impact the future of the GYE grizzly population .	Factor A	I live within the Greater Yellowstone Ecosystem (GYE) and am apposed to delisting grizzly bears in the GYE for the following reasons: 1. Fact is, no one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services computer generated numbers. But, what we do emphatically know is that at least 60 grizzlies died last year and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest reproductive rate of any mammal in the GYE. The continuation of such high mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work is needed in the GYE to prevent many of unnecessary grizzly deaths before this population can be safely delisted. Such actions as requiring ranchers to relocate their garbage and carcass dumps to secure county facilities, the use of bear-proof garbage cans in communities within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for public land users, and stiffer penalties for illegal killings need to be employed within the GYE prior to grizzlies being delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate grizzlies from other populations into the GYE to improve genetic diversity, but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat and prevent them from colonizing other lands in which they were originally found. This "discouragement" will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of the land grizzlies would be "discouraged" from is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. For the future survival of this isolated population occupation of additional habitat is crucial to their long-term survival. In this case, size does matter! Additional habitat will likely incorporate additional diversity of habitat types and harbor a greater variety food sources for grizzlies. Providing additional habitat to these large carnivores with enormous territorial needs is essential to their long-term survival. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout, and even army cutworm moth populations (due to Midwest famers spraying the larvae with insecticides) have all been noted. These high calorie food deficits represent a severe loss for those grizzlies that once feasted on these nutritional foods. More research is needed to determine how the loss of these food sources (and likely others) will impact the future GYE grizzly population. Add in drought and climate change and much more.	FWS-R6-ES-2016-0042-3124	
Yellowstone grizzly bears are not recovered and continue to be imperiled by resource declines such as habitat and dietary losses. Today, wild grizzly bears number fewer than 1,700 individuals in the lower 48 states. Grizzly bears have not recovered across a significant portion of their range, and thus they are not recovered and should not be delisted. Hunting grizzly bears would further jeopardize their persistence.	Factor A	Please see the attached comment letter. I urge FWS not to remove grizzly bears from protections under the ESA, and I strongly oppose trophy-hunting of grizzly bears. Attachments Oppose grizzly delisting_comment letter_May 2016	FWS-R6-ES-2016-0042-3274	

Grizzly bears face multiple threats to persistence including the loss of their primary food resources. Currently, whitebark pine seeds, native cutthroat trout, huckleberries, army cutworm moths, elk and bison are either declining and/or are expected to decline in the foreseeable future as a result of habitat loss, climate change, drought, invasive species and other anthropogenic causes. Traditionally, whitebark pine seeds have provided a core dietary staple for grizzly bears. Yet, the whitebark pine, a species the FWS agrees warrants federal protection, is in decline because of a variety of problems. Another key source of sustenance, the cutthroat trout, has stopped spawning in all tributaries of Yellowstone Lake. Army cutworm moths, a staple for grizzly bears since the late 1990s, could likely disappear because they nectar on tundra flowers, which are highly vulnerable to global warming. Berries have become largely unavailable to grizzly bears due to warming summer temperatures and drought severity since at least 2005. These food failures of whitebark pine, cutthroat trout, huckleberries have caused grizzly bears to switch to a more meat-based diet, including domestic livestock.	Factor A	Please see the attached comment letter. I urge FWS not to remove grizzly bears from protections under the ESA, and I strongly oppose trophy-hunting of grizzly bears. Attachments Oppose grizzly delisting_comment letter_May 2016	FWS-R6-ES-2016-0042-3274	
These food failures of whitebark pine, cutthroat trout, huckleberries have caused grizzly bears to switch to a more meat-based diet, including domestic livestock. In addition, Yellowstone's Jackson and Northern Range elk herds and its Central Range bison herd are all in decline. As a result, bears have been in conflict with humans, leading to record numbers of lethal actions taken against them.	Factor A	Please see the attached comment letter. I urge FWS not to remove grizzly bears from protections under the ESA, and I strongly oppose trophy-hunting of grizzly bears. Attachments Oppose grizzly delisting_comment letter_May 2016	FWS-R6-ES-2016-0042-3274	
biologists have noted that grizzly bear cub production has declined, perhaps because of more predation on cubs by wolves and other bears as a result of their new dependence upon a meat-based diet, which puts them into greater proximity with other predators, resulting in deadly strife on grizzly bear cubs. The loss of flora and fauna upon which grizzly bears depend in Yellowstone and Grand Teton national parks, in part, explains why grizzly bears are dispersing in greater numbers from park lands to national forests lands, which are grazed by public lands permittees, to search for food.	Factor A	Please see the attached comment letter. I urge FWS not to remove grizzly bears from protections under the ESA, and I strongly oppose trophy-hunting of grizzly bears. Attachments Oppose grizzly delisting_comment letter_May 2016	FWS-R6-ES-2016-0042-3274	
While the conclusions of certain studies upon which the FWS relies suggest that grizzly bears have reached their carrying capacity, there is ample support for an alternative theory that bears have lost their historic dietary staples and are now turning to both native and domestic ungulates, putting them in closer proximity to humans, wolves and/or other bears. While this shift is occurring it is impossible to predict whether and when the Yellowstone grizzly bear population might reach its carrying capacity. FWS is not scientifically justified in concluding with certainty that the Greater Yellowstone population has reached long-term stability and is therefore secure for the foreseeable future. There is far too much uncertainty reflected in the current science to justify such a conclusion; rather, the best available science and the precautionary principle demands continued federal monitoring of this vulnerable population, which will only happen with continued ESA protection.	Factor A	Please see the attached comment letter. I urge FWS not to remove grizzly bears from protections under the ESA, and I strongly oppose trophy-hunting of grizzly bears. Attachments Oppose grizzly delisting_comment letter_May 2016	FWS-R6-ES-2016-0042-3274	

Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources.	Factor A	"Critics of the USFWS proposal say that lifting protections for the bear could endanger a growing population. The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to an estimated 700 or more today. But grizzly bears have all but disappeared from almost all of the continental United States, except for Yellowstone and Glacier National Park and a few other slivers of habitat, the New York Times reported May 3. "Critics also say that delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that FoA and local tribes, oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. "We cannot let human behavior and stupidity jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. "Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. "With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. "Even the author of the report that led to the delisting proposal, Dr. Christopher Servheen, grizzly bear recovery coordinator, U.S. Fish and Wildlife Service, admits private land development is the greatest threat to the nation's grizzlies, as further development could cut off connectivity among populations and disrupt vital habitat."	FWS-R6-ES-2016-0042-3328	
Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. A	Factor A	Delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that FoA and local tribes, oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. We cannot let human behavior and stupidity jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. - See more at: https://secure.friendsofanimals.org/news/2016/may/tell-usfws-not-remove-protections-yellowstone-grizzly-bear#sthash.AacfE21q.dpuf	FWS-R6-ES-2016-0042-3389	
also having spent the previous 40 years observing wild Grizzly Bears in the region I vehemently object to FWS alarming & disturbing attempt to sell its fiction of YGB recovery to a highly attuned and skeptical public on delisting of the YGB, a population clearly in decline, from ESA, this is dangerous and irresponsible also egregiously deficient in its unreferenced claims by not using the "best available science" as required by law. Over 70 grizzlies were killed by human activity, 10% of the known pop in the midst of millennial drought 2015 the hottest year on record for an animal with the slowest reproductive rate in North America. Vast declines in cutthroat trout, elk & moths causing YGB to redistribute itself in search of food which unnaturally fragments & divides the animals numbers by the extent of their redistribution (Mattson 2016) yet FWS density data could never reflect this as a result its conflated aerial counts of pop estimates. FWS says new food sources will do for them but all that awaits YGB in delisting is the gun barrel of the trophy hunter, now is not the time for YGB pop in trouble to be harvested for the entertainment of others. FWS ostensibly tells the public there's no more room for bears which contradicts the very spirit of ESA while undermining the intent of the law FWS is entrusted with by the people!	Factor A	See attached file(s) Attachments Comment on Grizzly Bear Delisting 5.10.16	FWS-R6-ES-2016-0042-3434	

The trend is not favorable for a healthy grizzly population with the adverse impacts of shrinking habitat due to human encroachment and the annual toll of human caused deaths.	Factor A	I am opposed to delisting grizzly bears in the Yellowstone Grand Teton Ecosystem (YGTE) at this time and providing my comments below as well as questions regarding the delisting proposal. There is no compelling reason for delisting and reducing the number of grizzly bears when the relatively small isolated and genetically impaired population in the YGTE is dependent on many rapidly changing variables. The trend is not favorable for a healthy grizzly population with the adverse impacts of shrinking habitat due to human encroachment and the annual toll of human caused deaths. In addition it is difficult to deny the adverse impacts climate change and other causes is having on critical food sources. There is little consensus on the actual population of grizzlies in the YGTE, but what is known is that only about 25% of the population is composed of breeding females, perhaps as few as 150.. With low reproduction rates, female bears are critically important in maintaining the population. How can anyone predict a robust future for a recovering species when there are so many variables and so many unknowns? How will delisting followed by hunting as Wyoming is planning, improve the long term survival of this iconic animal? How will killing members of a recovering species improve the genetics and predictability of the population dynamics? Clearly delisting means hunting as the plans are already in motion in Wyoming. And just as clearly, with the popularity of female bear number 399 and her importance to the tourism industry, she will be high on the list for trophy hunters. Several guides and individuals who want a bear skin rug and her stuffed head gathering dust in their den have made it clear that she is a prime target. Why put her life at risk when she has a huge fan base around the world? Since 399's habits are well documented, her den site is known, she is accustomed to seeing humans watching her, and she has a tracking collar - she is a dead duck. The USFWS knows that as well as everyone else. Without question she will be one of the first to go. There are other bears whose habits are well known. They are not causing problems but they along with 399 will be killed. Killing of these bears cannot be classified as hunting as there is no hunting required, it is just killing without any purpose other than to deprive others of seeing beautiful bears like 399 in the wild. And what happens if she or other bears are wounded in the killing free for all? Not one person will go hungry if these bears are not killed, however the world will be a much poorer place. This is a tragedy that does not have to happen. It is well known that the YGTE is an island with little connectivity to the rest of North America. The result is a genetic bottleneck and a current and long term threat to the health of the grizzly population. How will allowing the random killing of grizzlies with no concern for the lost genetics or even the sex of the bears, improve the gene pool in the YGTE? How will creating a mote around the YGTE by hunting at the boundaries improve the much needed genetic connectivity with bears outside the YGTE? Ensuring bears remain isolated will only further impair much needed connectivity. If America is to have a healthy and genetically robust grizzly population the grizzly must be protected in all areas designated as suitable grizzly bear habitat within and surrounding the YGTE, the Upper Green River Valley and the Wind River range. These are areas that are very important in ensuring critical long term population and distribution objectives are achieved. The Upper Green River area is an important habitat	FWS-R6-ES-2016-0042-3473	
I am tired of hunters seeing them as trophies and ranchers seeing them as vermin. If a rancher wants to live in Bear country then they have to learn to deal with them. We have cut down huge areas for development, taken away their food sources and that is why they take the odd cow, they need to eat as well. We can all coexist with wildlife if we choose to. There needs to be better management, of habitat. We need to stop handing out permits for hunting, we need to stop setting up ranches in their territory	Factor A	I am asking that you do not remove the Greater Yellowstone Grizzly bears from the endangered list. It has taken a very long 40 years for their numbers to get to where they are today. It is a proven fact that they do not reproduce fast the cubs stay with their mothers for a long time. They need that time to learn and grow. I am tired of hunters seeing them as trophies and ranchers seeing them as vermin. If a rancher wants to live in Bear country then they have to learn to deal with them. We have cut down huge areas for development, taken away their food sources and that is why they take the odd cow, they need to eat as well. We can all coexist with wildlife if we choose to. There needs to be better management, of habitat. We need to stop handing out permits for hunting, we need to stop setting up ranches in their territory, and we seriously need to get rid of the corruption in offices that are supposed to protect wildlife. Please for the sake of nature, do not delist the bears or the wolves for that matter. We can not afford to lose these magnificent bears because once they are gone.....there is no bringing them back Change the laws to protect them, stop letting hunters & ranchers dictate how wildlife should be protected for they are just out for themselves not for conservation of the protection of the species.	FWS-R6-ES-2016-0042-3425	
Rigorous scientific evidence related to the bears' diminishing food sources and the effects of climate change must not be ignored.	Factor A	I stand in support of the letter submitted by Jane Goodall and others opposing the proposed delisting of the grizzly bear in Greater Yellowstone. Rigorous scientific evidence related to the bears' diminishing food sources and the effects of climate change must not be ignored. In addition I support fully the opposition to delisting of 50 Native American tribes to whom the bear is a spiritual and sacred animal which should not be subjected to the aggression of trophy hunters. Failure to respect the beliefs of the First Americans is at the least disrespectful and undemocratic and at worst symptomatic of colonialist oppression. Attachments GB-ScientistFinal5-5-16	FWS-R6-ES-2016-0042-3481	

If America is to have a healthy and genetically robust grizzly population the grizzly must be protected in all areas designated as suitable grizzly bear habitat within and surrounding the YGTE, the Upper Green River Valley and the Wind River range. These are areas that are very important in ensuring critical long term population and distribution objectives are achieved. The Upper Green River area is an important habitat linking the bear populations to the Gros Ventre and Hoback regions as well as the Wind River Range. The Wind River Range has some of the last remaining stands of whitebark pine that provide a critical source of food in the bear's diet. However it is increasingly rare for a bear to make it through the Green River corridor to the Wind River Range and hunting will likely eliminate that potential completely.	Factor A	I am opposed to delisting grizzly bears in the Yellowstone Grand Teton Ecosystem (YGTE) at this time and providing my comments below as well as questions regarding the delisting proposal. There is no compelling reason for delisting and reducing the number of grizzly bears when the relatively small isolated and genetically impaired population in the YGTE is dependent on many rapidly changing variables. The trend is not favorable for a healthy grizzly population with the adverse impacts of shrinking habitat due to human encroachment and the annual toll of human caused deaths. In addition it is difficult to deny the adverse impacts climate change and other causes is having on critical food sources. There is little consensus on the actual population of grizzlies in the YGTE, but what is known is that only about 25% of the population is composed of breeding females, perhaps as few as 150.. With low reproduction rates, female bears are critically important in maintaining the population. How can anyone predict a robust future for a recovering species when there are so many variables and so many unknowns? How will delisting followed by hunting as Wyoming is planning, improve the long term survival of this iconic animal? How will killing members of a recovering species improve the genetics and predictability of the population dynamics? Clearly delisting means hunting as the plans are already in motion in Wyoming. And just as clearly, with the popularity of female bear number 399 and her importance to the tourism industry, she will be high on the list for trophy hunters. Several guides and individuals who want a bear skin rug and her stuffed head gathering dust in their den have made it clear that she is a prime target. Why put her life at risk when she has a huge fan base around the world? Since 399's habits are well documented, her den site is known, she is accustomed to seeing humans watching her, and she has a tracking collar - she is a dead duck. The USFWS knows that as well as everyone else. Without question she will be one of the first to go. There are other bears whose habits are well known. They are not causing problems but they along with 399 will be killed. Killing of these bears cannot be classified as hunting as there is no hunting required, it is just killing without any purpose other than to deprive others of seeing beautiful bears like 399 in the wild. And what happens if she or other bears are wounded in the killing free for all? Not one person will go hungry if these bears are not killed, however the world will be a much poorer place. This is a tragedy that does not have to happen. It is well known that the YGTE is an island with little connectivity to the rest of North America. The result is a genetic bottleneck and a current and long term threat to the health of the grizzly population. How will allowing the random killing of grizzlies with no concern for the lost genetics or even the sex of the bears, improve the gene pool in the YGTE? How will creating a mote around the YGTE by hunting at the boundaries improve the much needed genetic connectivity with bears outside the YGTE? Ensuring bears remain isolated will only further impair much needed connectivity. If America is to have a healthy and genetically robust grizzly population the grizzly must be protected in all areas designated as suitable grizzly bear habitat within and surrounding the YGTE, the Upper Green River Valley and the Wind River range. These are areas that are very important in ensuring critical long term population and distribution objectives are achieved. The Upper Green River area is an important habitat	FWS-R6-ES-2016-0042-3473	
Ecological security for brown/grizzly bears and essentially all other apex predators worldwide is rapidly evaporating due to continued rapid human population growth and development in areas where brown/grizzly bears had previously flourished, creating islands of habitat that will shortly isolate and extinguish bear populations. Apex predators (tigers, bears, wolves etc) are in serious decline worldwide due to the very same pressures that have unravelled the Yellowstone (and all other) grizzly/brown bear populations. Grizzly/brown bears are absent in Mexico, most of north America and throughout Europe and Asia where they have flourished up until this last century.	Factor A	Greetings wildlife managers, Thank you for accepting my comments to your agency's proposed delisting of the Yellowstone Grizzly bear population. Let me begin by saying that reducing protections for any population of grizzly bears is absolutely unwise, ludicrous and will backfire into a orgy of killing and extinction that is already plaguing this and all other apex predators worldwide. Ecological security for brown/grizzly bears and essentially all other apex predators worldwide is rapidly evaporating due to continued rapid human population growth and development in areas where brown/grizzly bears had previously flourished, creating islands of habitat that will shortly isolate and extinguish bear populations. Apex predators (tigers, bears, wolves etc) are in serious decline worldwide due to the very same pressures that have unravelled the Yellowstone (and all other) grizzly/brown bear populations. Grizzly/brown bears are absent in Mexico, most of north America and throughout Europe and Asia where they have flourished up until this last century. It is absolutely imprudent to take any step that does not further safeguard this species. Like the tremendously ugly fight and delisting (that required congressional riders from the republican congress) for several north American wolf population, it is clearly evident that these efforts are being fueled by powerful hunting and ranching interests possessing vast political influence, not the best interest of the species, ecosystem or the human population. Just because this sub-population of bears has risen slightly above there near extirpation levels several decades ago, they are absolutely still in a serious state of risk and decline across the landscape. Development, road use, food availability (partially due to the significant loss of whitebark pine in and around the ecosystem and competition with sporthunters and ranchers for other food sources). Mortality of grizzly/brown bear in and around the Yellowstone ecosystem has remained high due to road/railroad mortality, poaching, lethal control (ranchers etc), and conflicts with deer and elk hunters. In my view, management of an extremely vulnerable species like the Yellowstone grizzly should be carried out using a serious precautionary premise where no protections are lifted for the species and efforts are vastly escalated to connect bear populations, reduce conflicts with hunters and ranchers, end road/railroad mortality and prevent all further development/habitat loss of adjacent habitats associated with Yellowstone. If delisting of this majestic species occurs during the Obama administration, the legacy of a failed and bloodied conservation effort will be a blight on the memory of your agency and the presidency. I implore you to suspend efforts to reduce protections (delist) for this species and to reverse course and focus unprecedented resources into habitat acquisition, habitat connectivity, conflict reduction and vastly increasing penalties for poaching.	FWS-R6-ES-2016-0042-3520	

If we are to support grizzlies in the YGTE, migration corridors like the Upper Green River must be managed by establishing rules regarding livestock use of these public lands. Tourism is a key component of the economies of WY, ID and MT as travelers from throughout the world come to the YGTE to see wildlife including bears like 399. It doesn't make sense economically, scientifically, genetically or otherwise to start destroying these bears, especially when they are still recovering from past extermination attempts and near extinction. A decision to delist the recovering population of grizzlies in the YGTE is a decision to kill these magnificent animals leaving orphaned cubs and significantly reducing the opportunities for visitors to our parks to see grizzlies in the wild. The loss of 399 and other popular bears will not be taken lightly or forgotten soon and the USFWS will be held responsible.	Factor A	I am opposed to delisting grizzly bears in the Yellowstone Grand Teton Ecosystem (YGTE) at this time and providing my comments below as well as questions regarding the delisting proposal. There is no compelling reason for delisting and reducing the number of grizzly bears when the relatively small isolated and genetically impaired population in the YGTE is dependent on many rapidly changing variables. The trend is not favorable for a healthy grizzly population with the adverse impacts of shrinking habitat due to human encroachment and the annual toll of human caused deaths. In addition it is difficult to deny the adverse impacts climate change and other causes is having on critical food sources. There is little consensus on the actual population of grizzlies in the YGTE, but what is known is that only about 25% of the population is composed of breeding females, perhaps as few as 150.. With low reproduction rates, female bears are critically important in maintaining the population. How can anyone predict a robust future for a recovering species when there are so many variables and so many unknowns? How will delisting followed by hunting as Wyoming is planning, improve the long term survival of this iconic animal? How will killing members of a recovering species improve the genetics and predictability of the population dynamics? Clearly delisting means hunting as the plans are already in motion in Wyoming. And just as clearly, with the popularity of female bear number 399 and her importance to the tourism industry, she will be high on the list for trophy hunters. Several guides and individuals who want a bear skin rug and her stuffed head gathering dust in their den have made it clear that she is a prime target. Why put her life at risk when she has a huge fan base around the world? Since 399's habits are well documented, her den site is known, she is accustomed to seeing humans watching her, and she has a tracking collar - she is a dead duck. The USFWS knows that as well as everyone else. Without question she will be one of the first to go. There are other bears whose habits are well known. They are not causing problems but they along with 399 will be killed. Killing of these bears cannot be classified as hunting as there is no hunting required, it is just killing without any purpose other than to deprive others of seeing beautiful bears like 399 in the wild. And what happens if she or other bears are wounded in the killing free for all? Not one person will go hungry if these bears are not killed, however the world will be a much poorer place. This is a tragedy that does not have to happen. It is well known that the YGTE is an island with little connectivity to the rest of North America. The result is a genetic bottleneck and a current and long term threat to the health of the grizzly population. How will allowing the random killing of grizzlies with no concern for the lost genetics or even the sex of the bears, improve the gene pool in the YGTE? How will creating a mote around the YGTE by hunting at the boundaries improve the much needed genetic connectivity with bears outside the YGTE? Ensuring bears remain isolated will only further impair much needed connectivity. If America is to have a healthy and genetically robust grizzly population the grizzly must be protected in all areas designated as suitable grizzly bear habitat within and surrounding the YGTE, the Upper Green River Valley and the Wind River range. These are areas that are very important in ensuring critical long-term population and distribution objectives are achieved. The Upper Green River area is an important habitat	FWS-R6-ES-2016-0042-3473	
The degree and pace of habitat change occurring in the region MUST BE [AND IS NOT YET] INCORPORATED--human population is rapidly expanding; whitebark pine [a very important food source for grizzlies] is disappearing at an alarming rate due to mountain pine beetle infestation, blister rust and other diseases, and the effect of global warming in this ecosystem. THEREFORE, the Agency must protect unoccupied habitat outside of the recovery zone, including areas where bears have been prohibited. **Delisting necessitates habitat management plans WHICH DO NOT AS YET EXIST. Positive results can only be achieved if states fulfill their commitment to species recovery [when grizzlies are finally declared recovered and states assume primary responsibility for management of the species]. The delisting plan CONTAINS NO HABITAT PROTECTIONS FOR ABOUT 1/3 OF OCCUPIED GRIZZLY HABITAT. To sustain current population numbers, habitat conditions must also be maintained. The current PLAN ONLY PROTECTS LANDS WITHIN THE SIX MILLION ACRE RECOVERY ZONE, AND LEAVES OUT OVER TWO MILLION HABITAT ACRES, all of which except 15% protected as Wilderness IS OPEN TO DEVELOPMENT. ONE FINAL POINT [though not SCIENTIFIC, it is based on reliable data from numerous studies]:	Factor A	I STRONGLY OPPOSE YELLOWSTONE GRIZZLY BEAR DELISTING. **The size and distribution of the current population of grizzly bears does not ensure long-term viability--science indicates that a population of several thousand, AS WELL AS connecting grizzly ecosystems [e.g. to source populations in Canada] is required to achieve this goal. NOTE THAT THE LOSS OF ONLY A FEW FEMALE BEARS EACH YEAR CAN MEAN THE DIFFERENCE BETWEEN A STABLE OR DECLINING POPULATION. Studies show that it typically takes a female grizzly TEN (10) years to have a female cub that survives to give birth. **The degree and pace of habitat change occurring in the region MUST BE [AND IS NOT YET] INCORPORATED--human population is rapidly expanding; whitebark pine [a very important food source for grizzlies] is disappearing at an alarming rate due to mountain pine beetle infestation, blister rust and other diseases, and the effect of global warming in this ecosystem. THEREFORE, the Agency must protect unoccupied habitat outside of the recovery zone, including areas where bears have been prohibited. **Delisting necessitates habitat management plans WHICH DO NOT AS YET EXIST. Positive results can only be achieved if states fulfill their commitment to species recovery [when grizzlies are finally declared recovered and states assume primary responsibility for management of the species]. Certainly, WOLF RECOVERY MANAGEMENT in WY following delisting in the Northern Rockies in 2011, DOES NOT BODE WELL for the grizzlies: WY classified wolves as PREDATORS, permitting anyone to kill them, by any means, any DAY OF THE YEAR, for any reason, across 85 percent of the State. **The delisting plan CONTAINS NO HABITAT PROTECTIONS FOR ABOUT 1/3 OF OCCUPIED GRIZZLY HABITAT. To sustain current population numbers, habitat conditions must also be maintained. The current PLAN ONLY PROTECTS LANDS WITHIN THE SIX MILLION ACRE RECOVERY ZONE, AND LEAVES OUT OVER TWO MILLION HABITAT ACRES, all of which except 15% protected as Wilderness IS OPEN TO DEVELOPMENT. ONE FINAL POINT [though not SCIENTIFIC, it is based on reliable data from numerous studies]: **More and more nature-loving Americans BELIEVE THAT SPECIES LIKE GRIZZLIES and wolves should be part of the landscape. Unlike in the "frontier days," when predators were ONLY VIEWED as liabilities, there is growing sentiment that uncommon species like grizzlies are WORTH MORE ALIVE THAN DEAD. A large part of the Greater Yellowstone Ecosystem's \$1 BILLION tourism industry is based on wildlife viewing.	FWS-R6-ES-2016-0042-3509	

Just because this sub-population of bears has risen slightly above there near extirpation levels several decades ago, they are absolutely still in a serious state of risk and decline across the landscape. Development, road use, food availability (partially due to the significant loss of whitebark pine in and around the ecosystem and competition with sporthunters and ranchers for other food sources).	Factor A	Greetings wildlife managers, Thank you for accepting my comments to your agency's proposed delisting of the Yellowstone Grizzly bear population. Let me begin by saying that reducing protections for any population of grizzly bears is absolutely unwise, ludicrous and will backfire into a orgy of killing and extinction that is already plaguing this and all other apex predators worldwide. Ecological security for brown/grizzly bears and essentially all other apex predators worldwide is rapidly evaporating due to continued rapid human population growth and development in areas where brown/grizzly bears had previously flourished, creating islands of habitat that will shortly isolate and extinguish bear populations. Apex predators (tigers, bears, wolves etc) are in serious decline worldwide due to the very same pressures that have unravelled the Yellowstone (and all other) grizzly/brown bear populations. Grizzly/brown bears are absent in Mexico, most of north America and throughout Europe and Asia where they have flourished up until this last century. It is absolutely imprudent to take any step that does not further safeguard this species. Like the tremendously ugly fight and delisting (that required congressional riders from the republican congress) for several north American wolf population, it is clearly evident that these efforts are being fueled by powerful hunting and ranching interests possessing vast political influence, not the best interest of the species, ecosystem or the human population. Just because this sub-population of bears has risen slightly above there near extirpation levels several decades ago, they are absolutely still in a serious state of risk and decline across the landscape. Development, road use, food availability (partially due to the significant loss of whitebark pine in and around the ecosystem and competition with sporthunters and ranchers for other food sources). Mortality of grizzly/brown bear in and around the Yellowstone ecosystem has remained high due to road/railroad mortality, poaching, lethal control (ranchers etc), and conflicts with deer and elk hunters. In my view, management of an extremely vulnerable species like the Yellowstone grizzly should be carried out using a serious precautionary premise where no protections are lifted for the species and efforts are vastly escalated to connect bear populations, reduce conflicts with hunters and ranchers, end road/railroad mortality and prevent all further development/habitat loss of adjacent habitats associated with Yellowstone. If delisting of this majestic species occurs during the Obama administration, the legacy of a failed and bloodied conservation effort will be a blight on the memory of your agency and the presidency. I implore you to suspend efforts to reduce protections (delist) for this species and to reverse course and focus unprecedented resources into habitat acquisition, habitat connectivity, conflict reduction and vastly increasing penalties for poaching.	FWS-R6-ES-2016-0042-3520	
FWS claims there is a large and healthy population of bears but scientists and even the former NPS superintendent of Yellowstone have questioned the studies numbers and methodology. FWS is also claiming bears are not suffering adversely from the loss of 2 major food sources, the cutthroat trout and whitebark pine. It is too early to be sure what long term affect this will have on the bears but 2015 was a record year for Grizzlies killed around Yellowstone and as bears are forced out of the national park in search of food they will be left vulnerable to being shot without protections imparted by the endangered species act. Delisting the grizzly bears could result in decades of recovery work being lost in a few short years under state management which will allow trophy hunting, according to a memo between the states widely circulated in the media.	Factor A	I am opposed to the delisting of the Yellowstone grizzly bear. As a long time resident and guide in Yellowstone National Park I have serious concerns about the future of the grizzly bear and the sustainability of their population. FWS claims there is a large and healthy population of bears but scientists and even the former NPS superintendent of Yellowstone have questioned the studies numbers and methodology. FWS is also claiming bears are not suffering adversely from the loss of 2 major food sources, the cutthroat trout and whitebark pine. It is too early to be sure what long term affect this will have on the bears but 2015 was a record year for Grizzlies killed around Yellowstone and as bears are forced out of the national park in search of food they will be left vulnerable to being shot without protections imparted by the endangered species act. Delisting the grizzly bears could result in decades of recovery work being lost in a few short years under state management which will allow trophy hunting, according to a memo between the states widely circulated in the media. As a guide in Yellowstone park, I rely on wildlife being visible for my clients. Delisting the grizzly is bad for bears, bad for business and wrong for Yellowstone.	FWS-R6-ES-2016-0042-3544	
Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, & meat from various sources. 2 of these foods have been dramatically reduced in recent years; whitebark pine seeds & cutthroat trout. The 1988 fires, an introduced fungal pathogen & an unprecedented bark beetle outbreak to the whitebark which together with up to 90% loss of spawning cutthroat trout due to the introduction of Lake trout into Yellowstone Lake have impacted on food supply for the grizzlies. Cutworm moths are an unreliable source as they migrate into high elevation slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. Meat as the only remaining high-quality food resource. The Rule is based on assumption for which there is no evidence base, that as grizzlies are generalists with a broad range in diet, a loss of critical food resources has minimal negative impact. The current sources of replaced food assumed are poor quality, do not equate to "replacement", and will negatively impact the carrying capacity of Yellowstone. There is no evidence to suggest otherwise.	Factor A	Please see below Attachments 160507 Grizzly bears	FWS-R6-ES-2016-0042-3400	

Currently the whitebark pine in the GYA area which is a main food source for the bears has been greatly reduced due to the mountain pine beetle. With the effects of climate change, further food sources and habitat areas for the grizzlies may be diminished in the future.	Factor A	I am asking you to reconsider your proposal about removing the Greater Yellowstone Area (GYA) population of grizzly bears from the List of Endangered and Threatened Wildlife. Even though the GYA bear population as grown to an estimated 700 animals, with some estimates giving higher number, I believe this number may not be high enough to consider reducing the population through hunting. Currently the whitebark pine in the GYA area which is a main food source for the bears has been greatly reduced due to the mountain pine beetle. With the effects of climate change, further food sources and habitat areas for the grizzlies may be diminished in the future. Genetic diversity in the GYA grizzly population may also be significantly affected if the population is allowed to be reduced to 500 animals. A FWS talking points paper on this issue states that if the population falls below 500, the Montana FWP would transplant bears from other areas to maintain genetic diversity. Why not let the GYA grizzly population grow to a point where the genetic diversity is robust enough, then reconsider the delisting options. One study states that it may take a population of 1850 animals to maintain adequate genetic diversity. Please understand that I am not opposed to hunting, and have hunted big game wildlife in the past. However I see no practical need to hunt grizzly bears. This is trophy hunting only, nothing more, nothing less. Even though the USFWS has approved management plans from the states of Montana, Wyoming, and Idaho, what assurances are there that any or all of these states won't make changes to these plans that would have considerable negative impacts on the grizzly population. There is also no need for depredation hunts, as to my knowledge there is no significant grizzly activity that is causing widespread damage to human or domestic livestock. The growing robust grizzly population is a good thing, and the USFWS should be commended for taking the steps that have allowed this to happen. With this growth comes the inevitable increase of human/grizzly encounters. With more people than ever visiting the Yellowstone area and more bears, this is a predictable situation. However much of the responsibility for these encounters has to be placed on humans. We are visiting the bears habitat, and need to learn to respect that. If humans go out and do stupid things like approach bison or enter bear habitat areas without taking the necessary precautions, it should not be the animals who are blamed and hunted. Finally, it is ironic to me that on the USFWS home web page the winning poster for the 2016 Saving Endangered Species Youth Art Contest. It's hard to miss the grizzly right in the middle of the poster. It would be a shame if the GYA grizzly population is placed right back on the Threatened and Endangered Wildlife List again in the near future because a delisting decision was made to soon. Please reconsider this proposal and leave the GYA grizzly population on the List of Threatened and Endangered Wildlife for the time being.	FWS-R6-ES-2016-0042-3599	
here is also no need for depredation hunts, as to my knowledge there is no significant grizzly activity that is causing widespread damage to human or domestic livestock.	Factor A	I am asking you to reconsider your proposal about removing the Greater Yellowstone Area (GYA) population of grizzly bears from the List of Endangered and Threatened Wildlife. Even though the GYA bear population as grown to an estimated 700 animals, with some estimates giving higher number, I believe this number may not be high enough to consider reducing the population through hunting. Currently the whitebark pine in the GYA area which is a main food source for the bears has been greatly reduced due to the mountain pine beetle. With the effects of climate change, further food sources and habitat areas for the grizzlies may be diminished in the future. Genetic diversity in the GYA grizzly population may also be significantly affected if the population is allowed to be reduced to 500 animals. A FWS talking points paper on this issue states that if the population falls below 500, the Montana FWP would transplant bears from other areas to maintain genetic diversity. Why not let the GYA grizzly population grow to a point where the genetic diversity is robust enough, then reconsider the delisting options. One study states that it may take a population of 1850 animals to maintain adequate genetic diversity. Please understand that I am not opposed to hunting, and have hunted big game wildlife in the past. However I see no practical need to hunt grizzly bears. This is trophy hunting only, nothing more, nothing less. Even though the USFWS has approved management plans from the states of Montana, Wyoming, and Idaho, what assurances are there that any or all of these states won't make changes to these plans that would have considerable negative impacts on the grizzly population. There is also no need for depredation hunts, as to my knowledge there is no significant grizzly activity that is causing widespread damage to human or domestic livestock. The growing robust grizzly population is a good thing, and the USFWS should be commended for taking the steps that have allowed this to happen. With this growth comes the inevitable increase of human/grizzly encounters. With more people than ever visiting the Yellowstone area and more bears, this is a predictable situation. However much of the responsibility for these encounters has to be placed on humans. We are visiting the bears habitat, and need to learn to respect that. If humans go out and do stupid things like approach bison or enter bear habitat areas without taking the necessary precautions, it should not be the animals who are blamed and hunted. Finally, it is ironic to me that on the USFWS home web page the winning poster for the 2016 Saving Endangered Species Youth Art Contest. It's hard to miss the grizzly right in the middle of the poster. It would be a shame if the GYA grizzly population is placed right back on the Threatened and Endangered Wildlife List again in the near future because a delisting decision was made to soon. Please reconsider this proposal and leave the GYA grizzly population on the List of Threatened and Endangered Wildlife for the time being.	FWS-R6-ES-2016-0042-3599	

2. Declining food resources There is no evidence in The Rule for true accounting on this point. Historically, there have been four critical foods for grizzlies in Yellowstone: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are "generalists with a broad range in diet", but what really is important for maintaining the population is availability of high quality food at the right time of the year within an INTACT ECOSYSTEM. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. These four points have not been taken into consideration. This is unscientific.	Factor A	I wish to comment on the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I wish to strongly oppose such a removal for the following reasons: 1. Climate Change Impacts Climate change is a real, scientific and provable issue and the park and its inhabitants have already been affected. To dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." with no proper scientific evidence is laughable. The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule, which is highly questionable. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population. This leads into my second point. 2. Declining food resources There is no evidence in The Rule for true accounting on this point. Historically, there have been four critical foods for grizzlies in Yellowstone: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are "generalists with a broad range in diet", but what really is important for maintaining the population is availability of high quality food at the right time of the year within an INTACT ECOSYSTEM. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. These four points have not been taken into consideration. This is unscientific. 3. Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase numbers in the ecosystem (ref. Fig. 1 p 13180, of The Rule). Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. Do the math: mortality levels of recent years is not sustainable. 4. Population Estimates A remote and rugged area such as the Greater Yellowstone ecosystem posed problems for accurate measurement. Accuracy- real accuracy- is necessary for making such a huge decision about delisting. The current methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by any subsequent IGBST rebuttal and so I would think it fair and in the interests of rigorous science for all data regarding grizzly numbers to be made available for truly independent	FWS-R6-ES-2016-0042-3805	
Bears take a long time to reproduce and we have taken away most of their habitat and way of life as a consequence.	Factor A	Bears take a long time to reproduce and we have taken away most of their habitat and way of life as a consequence. The simple fact that grizzly deaths have been rising since 2002 suggests that delisting is a bad idea. This proposed rule is just baffling to me. The grizzlies still need to be protected!	FWS-R6-ES-2016-0042-3970	
FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted, but they barely survive in 4% of their historic range in the lower 48 states.	Factor A	I am writing to voice my OPPOSITION to the delisting of the GYE Grizzly bear. I have many reasons which include the following: FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted, but they barely survive in 4% of their historic range in the lower 48 states. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups like WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. Also, even with protections, 59 grizzlies were killed in 2015. Another reason the grizzly should not be delisted is the fact that wildlife watchers pay millions of dollars each year to come to Yellowstone to see wolves and bears. I am a part of that statistic. Yellowstone National Park was our first established park and it is a national heritage. I, as a wildlife watcher, have just as much right to see grizzlies in the wild running free and safe as do trophy hunters have to kill them. Only difference is my activity doesn't take away from others. It is a rare treat to see a grizzly in the park while they are protected. I can only imagine the decline in sightings once they are delisted. If grizzlies can't be seen many tourist will find no reason to visit Yellowstone anymore. Tourist dollars will decline. All our favorite bears that we have followed for years and years will be targeted. #399, a 20 year old sow is already lined up in several hunter's scopes. Is it because she would be a great trophy on a wall? NO!! In fact she is targeted because she is loved by thousands of adoring watchers that have watched her raise cubs over the years. They want to kill her just to hurt her admirers. One important thing I want to point out is that there is this misconception that some seem to think that if there is a hunting season for grizzlies then there will be more tolerance towards them. That is so far from the truth. They said that about the wolves, as well, and look at the mass hatred that builds stronger and stronger each season. Each year more and more intolerance builds and the lust for blood increases. As the old saying goes if you give a little then they want more and more and more. Why recover a species just to hunt them back to critical levels again? Climbing back up from a decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. Even then infant mortality is greater than 50%. Also you can't trust Montana, Idaho, Wyoming to be fair in protecting and maintaining the grizzly populations. They proved that when they were given control over the wolf populations. They only cater to the trophy hunters and ungulate hunters. As a matter fact, Wyoming failed so miserably that the Federal government had to take control back from them with regards to the wolves. Their track record is clearly unhealthy for the wildlife management	FWS-R6-ES-2016-0042-4218	

There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. Â	Factor A	Florida's Bear Hunt was a travesty with 300 bears killed in 2 days,some with babies even though that was against the rules. My family has a second home in Montana in Polson and this is just wrong. THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected. #DontDelistGrizzlies! #ROAR!	FWS-R6-ES-2016-0042-4229	
(1) the population has not grown in recent decades, (2) death rates have actually increased, and (3) changes to food sources puts grizzly bears in greater conflict with humans	Factor A	I oppose delisting of grizzly bears because (1) the population has not grown in recent decades, (2) death rates have actually increased, and (3) changes to food sources puts grizzly bears in greater conflict with humans First, even the United States Fish & Wildlife Service concedes that the Yellowstone grizzly population has not grown since the early 2000s. Indeed, there are nearly as many bears in the ecosystem today as there were 15 years ago. It is true the bears are more visible but this is not due to a population increase. Rather, this is due to changing food sources which force grizzlies to range further in search of food. Even though they are omnivores, not all foods are created equal. We humans, as omnivores, know that a steak does not equal a salad. With the loss of whitebark pine, grizzlies have turned to a diet more focused on meat. This conversion to meat puts bears in greater conflict with humans - namely hunters and livestock operations. What happens when grizzlies conflict with humans? Grizzlies die. In fact, a record number of grizzly bears died in the Yellowstone ecosystem just last year. Moreover, 80% of adult grizzly deaths can be attributed to human causes. Grizzly bear deaths are actually increasing in the ecosystem. From 2002-2011, grizzly deaths increased at a rate of 9-11% a year. Therefore, the population is not necessarily stable. With a stagnant growth rate and increasing death rate, why would USFWS even be considering removing these bears from the Endangered Species List? Please listen to the science - the best available science - and keep Yellowstone area grizzly bears protected under the Endangered Species Act.	FWS-R6-ES-2016-0042-4244	
With the loss of whitebark pine, grizzlies have turned to a diet more focused on meat. This conversion to meat puts bears in greater conflict with humans - namely hunters and livestock operations.	Factor A	I oppose delisting of grizzly bears because (1) the population has not grown in recent decades, (2) death rates have actually increased, and (3) changes to food sources puts grizzly bears in greater conflict with humans First, even the United States Fish & Wildlife Service concedes that the Yellowstone grizzly population has not grown since the early 2000s. Indeed, there are nearly as many bears in the ecosystem today as there were 15 years ago. It is true the bears are more visible but this is not due to a population increase. Rather, this is due to changing food sources which force grizzlies to range further in search of food. Even though they are omnivores, not all foods are created equal. We humans, as omnivores, know that a steak does not equal a salad. With the loss of whitebark pine, grizzlies have turned to a diet more focused on meat. This conversion to meat puts bears in greater conflict with humans - namely hunters and livestock operations. What happens when grizzlies conflict with humans? Grizzlies die. In fact, a record number of grizzly bears died in the Yellowstone ecosystem just last year. Moreover, 80% of adult grizzly deaths can be attributed to human causes. Grizzly bear deaths are actually increasing in the ecosystem. From 2002-2011, grizzly deaths increased at a rate of 9-11% a year. Therefore, the population is not necessarily stable. With a stagnant growth rate and increasing death rate, why would USFWS even be considering removing these bears from the Endangered Species List? Please listen to the science - the best available science - and keep Yellowstone area grizzly bears protected under the Endangered Species Act.	FWS-R6-ES-2016-0042-4244	
lthough bears are opportunistic eaters, the GYE is not very abundant or diverse in its food sources.	Factor A	Not Right I am against delisting the GYE grizzly bear. Climate change will continue to alter habitat and affect food sources, along with impacts to behavior, seasonal shifts, among other unknowns. Two important bear foods in the GYE, Whitebark pine and westslope cutthroat trout, continue to decline due to climate change and competition with invasives. Although bears are opportunistic eaters, the GYE is not very abundant or diverse in its food sources. Fewer natural food sources to choose from mean that grizzly bears will likely be forced out of the protected boundary in search of other food items that may get them into trouble, such as cattle and garbage. Unprotected bears, wandering outside of the park in search of food only to find the end of a rifle may lead to a much larger reduction in population than the FWS is proposing with its 675 target, especially since humans can already kill grizzlies they perceive to be a threat to their life or property. Now is not the time to remove GYE grizzly bears from protection, when climate change will only continue to raise temperatures and cause additional impacts yet to be identified. Thank you!	FWS-R6-ES-2016-0042-4272	

Fewer natural food sources to choose from mean that grizzly bears will likely be forced out of the protected boundary in search of other food items that may get them into trouble, such as cattle and garbage.	Factor A	Not Right I am against delisting the GYE grizzly bear. Climate change will continue to alter habitat and affect food sources, along with impacts to behavior, seasonal shifts, among other unknowns. Two important bear foods in the GYE, Whitebark pine and westslope cutthroat trout, continue to decline due to climate change and competition with invasives. Although bears are opportunistic eaters, the GYE is not very abundant or diverse in its food sources. Fewer natural food sources to choose from mean that grizzly bears will likely be forced out of the protected boundary in search of other food items that may get them into trouble, such as cattle and garbage. Unprotected bears, wandering outside of the park in search of food only to find the end of a rifle may lead to a much larger reduction in population than the FWS is proposing with its 675 target, especially since humans can already kill grizzlies they perceive to be a threat to their life or property. Now is not the time to remove GYE grizzly bears from protection, when climate change will only continue to raise temperatures and cause additional impacts yet to be identified. Thank you!	FWS-R6-ES-2016-0042-4272	
3. The impacts of climate change, loss of vital food sources and the lack of connectivity to other grizzly bear populations in the lower 48 states seriously jeopardize the recovery of grizzly bears in the GYE. USFWS will undermine the recovery of the species as a whole by prematurely removing the federal protections that allowed the GYE population to make a comeback in the first place.	Factor A	Thank you for the opportunity to comment on the U.S. Fish and Wildlife Service's (USFWS) proposed rule to remove the Greater Yellowstone Ecosystem (GYE) population of grizzly bears from the federal list of endangered and threatened wildlife (81 Fed. Reg. 13,174 (Mar. 11, 2016)). 1. The proposed delisting rule is premature. Grizzly bears currently occupy less than 1% of their former range and represent only 1% of the pre-European population. The ESA requires that adequate regulatory mechanisms be in place before removing a protected species from the list of endangered and threatened wildlife. 15 U.S.C. 1533 (c); 50 C.F.R. 424.11. These measures ensure continued recovery for the species after federal ESA protections are removed. The proposed rule depends on a conservation strategy and state management plans that do not exist in final form yet. 81 Fed. Reg. at 13,189. 2. USFWS cannot proceed in simultaneously designating the GYE population of grizzly bears as a "distinct population segment" (DPS) under the ESA while also delisting the newly created entity. See 81 Fed. Reg. 13,190; and Humane Soc'y of the United States v. Jewell, 76 F. Supp. 3d 69 (D.D.C. 2014). USFWS may "respectfully disagree[s]" with the court's analysis and interpretation of the agency's DPS policy in Humane Society, 81 Fed. Reg. 13,190, but it cannot ignore the law as it currently stands. 3. The impacts of climate change, loss of vital food sources and the lack of connectivity to other grizzly bear populations in the lower 48 states seriously jeopardize the recovery of grizzly bears in the GYE. USFWS will undermine the recovery of the species as a whole by prematurely removing the federal protections that allowed the GYE population to make a comeback in the first place. 4. USFWS notes repeatedly throughout the proposed rule that the primary threat facing grizzly bears since their listing (and before) is human-caused mortality. See e.g., 81 Fed. Reg. 13,178; 13,187; 13,200. Yet, the proposed rule provides provisions for state-regulated trophy hunts to occur as soon as the rule is finalized. This makes no sense. Hostile state management focused on trophy hunting and removal of bears that attempt to disperse out of the GYE could quickly reverse population gains and eliminate any possibility of connectivity between bear populations. Last year, the GYE population experienced record-high mortality levels with 59 deaths, 54 of which were likely human-caused. IGBST Mortality Database (2015). Allowing the dramatic increase in mortality that hunting will most likely bring to this population will directly reverse recovery efforts from nearing success to beginning recovery efforts all over again. 5. Before delisting, conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat. I urge you to reconsider your proposal to remove federal ESA protections from GYE grizzly bears. Such a proposal is simply premature and does not comport with your responsibility and duty under the law to recover this species to the American West.	FWS-R6-ES-2016-0042-4336	
If federal protections are removed from GYE grizzly bears, the states of Idaho, Montana, and Wyoming will rush to open up trophy-hunting seasons. Indeed, these states have already divided up hunting rights for the bears. ¹⁰ Additionally, bears that leave the GYE core habitat would be subject to trophy hunting adopted by state wildlife managers, despite the fact that these dispersing individuals could provide vital connections between other subpopulations, maintaining genetic diversity. ¹	Factor A	Please accept as part of the record the attached letter, signed by 84 organizations, in opposition to the delisting proposal. This replaces comment tracking number 1k0-8pj9-lrmv. Attachments Yellowstone Grizzly-Sign-on Letter 2016_05.09 84	FWS-R6-ES-2016-0042-4326	

5. Before delisting, conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat. I urge you to reconsider your proposal to remove federal ESA protections from GYE grizzly bears. Such a proposal is simply premature and does not comport with your responsibility and duty under the law to recover this species to the American West.	Factor A	Thank you for the opportunity to comment on the U.S. Fish and Wildlife Service's (USFWS) proposed rule to remove the Greater Yellowstone Ecosystem (GYE) population of grizzly bears from the federal list of endangered and threatened wildlife (81 Fed. Reg. 13,174 (Mar. 11, 2016)). 1. The proposed delisting rule is premature. Grizzly bears currently occupy less than 1% of their former range and represent only 1% of the pre-European population. The ESA requires that adequate regulatory mechanisms be in place before removing a protected species from the list of endangered and threatened wildlife. 15 U.S.C. 1533 (c); 50 C.F.R. 424.11. These measures ensure continued recovery for the species after federal ESA protections are removed. The proposed rule depends on a conservation strategy and state management plans that do not exist in final form yet. 81 Fed. Reg. at 13,189. 2. USFWS cannot proceed in simultaneously designating the GYE population of grizzly bears as a "distinct population segment" (DPS) under the ESA while also delisting the newly created entity. See 81 Fed. Reg. 13,190; and Humane Soc'y of the United States v. Jewell, 76 F. Supp. 3d 69 (D.D.C. 2014). USFWS may "respectfully disagree[s]" with the court's analysis and interpretation of the agency's DPS policy in Humane Society, 81 Fed. Reg. 13,190, but it cannot ignore the law as it currently stands. 3. The impacts of climate change, loss of vital food sources and the lack of connectivity to other grizzly bear populations in the lower 48 states seriously jeopardize the recovery of grizzly bears in the GYE. USFWS will undermine the recovery of the species as a whole by prematurely removing the federal protections that allowed the GYE population to make a comeback in the first place. 4. USFWS notes repeatedly throughout the proposed rule that the primary threat facing grizzly bears since their listing (and before) is human-caused mortality. See e.g., 81 Fed. Reg. 13,178; 13,187; 13,200. Yet, the proposed rule provides provisions for state-regulated trophy hunts to occur as soon as the rule is finalized. This makes no sense. Hostile state management focused on trophy hunting and removal of bears that attempt to disperse out of the GYE could quickly reverse population gains and eliminate any possibility of connectivity between bear populations. Last year, the GYE population experienced record-high mortality levels with 59 deaths, 54 of which were likely human-caused. IGBST Mortality Database (2015). Allowing the dramatic increase in mortality that hunting will most likely bring to this population will directly reverse recovery efforts from nearing success to beginning recovery efforts all over again. 5. Before delisting, conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat. I urge you to reconsider your proposal to remove federal ESA protections from GYE grizzly bears. Such a proposal is simply premature and does not comport with your responsibility and duty under the law to recover this species to the American West.	FWS-R6-ES-2016-0042-4336	
Large-bodied carnivores are sparsely populated across vast areas; they are slow to reproduce, provide extended parental care to their young, and social stability promotes their resiliency. 12 Human persecution affects their social structure, 13 harms their persistence, 14 and is "super additive" meaning that hunting pressures far exceed what would occur in nature.15 Hunting mortality has direct effects on population growth rates because of increased mortality, but it can have indirect effects, too, such as disrupting the sex and age structure of a population.16 Hunting bears during their period of hyperphagia is energetically costly to them as they shift their sleeping patterns and become more nocturnal to avoid being hunted, 17 and hunting females can influence a lifetime of reproductive success.18 Females with cubs generally avoid males as a strategy of avoiding sexually-selected infanticide, but this means that they often choose suboptimal habitats, including in closer proximity to humans, and this affects their diet quality and reduces their reproductive potential. 19 Hunting makes the risk of sexually-selected infanticide greater, which leads to increased avoidance of males by females, and, ultimately, to lower fecundity.20 Right now, an unsustainable number of grizzly bears are dying in the GYE. In 2015, approximately 60 grizzly bears "excluding the bears that agents could not find" are known to have died in the GYE from various causes. 21 This is a substantial portion of the estimated population of the slowest-reproducing mammal in North America. Meanwhile, more than half of grizzly bears killed by humans go unreported" from 46 to 66 percent.22	Factor A	Please accept as part of the record the attached letter, signed by 84 organizations, in opposition to the delisting proposal. This replaces comment tracking number 1k0-8pj9-Irmv. Attachments Yellowstone Grizzly-Sign-on Letter 2016_05.09 84	FWS-R6-ES-2016-0042-4326	

Concerns of Factor A The six recovery ecosystems of bear populations are an acceptable way to monitor the total population. However, with the movement of individual bears, it may be hard to identify total state populations at a given time (WGFD 2016). Yes, some of these bears are collared by state agencies but from experience, not every bear can and will be collared (Turnbull 2015). If the allowable number of total mortalities for independent females cannot exceed 7.6%, 15% for independent males and 7.6% for dependent young, each states harvest quota for mortality will have to continually change during the harvest season. Quotas should be established at the beginning of a hunting season and remain the same throughout the season based on previous estimated population size in each state. The Demographic Monitoring Area (DMA) includes Wyoming, Montana and Idaho and poses variability for harvest quotas.	Factor A	The notion of delisting grizzly bears (<i>Ursus arctos horribilis</i>) from the Endangered Species List has been important to concerned Wyoming residents for quite some time now. I grew up in Cody, Wyoming where I have hunted, fished and travelled horseback through most of the Shoshone National Forest and Absaroka Wilderness. As a hunter and conservationist, I have personally witnessed part of the recovery of this species and believe that the population has recovered and this proposed rule should be made final. This docket was prepared in regards to the growing population of grizzly bears in the Greater Yellowstone Ecosystem (GYE). In compliance with the National Environmental Policy Act (NEPA), this statement is in the proposed rule for public comment (42 USC 4321-4370 1969). Livestock and human conflicts have been increasing every year (WGFD 2015). The planning within this document provides adequate data to prove that grizzlies have recovered and are at their carrying capacity for the Greater Yellowstone Ecosystem. With help from State and Tribal agencies and the Interagency Grizzly Bear Study Team (IGBST), the USFWS has shown that grizzlies can be delisted (42 USC 4321-4370 1969) and should be managed by State and Tribal governments. In accordance to the population ecology background, density-dependent and density-independent factors can regulate a population size (42 USC 4321-4370 1969). Intraspecific killing has been occurring as a density-dependent factor within the population; two bears were killed by other bears in 2014 (IGBST 2014). There has been an increase in home range-size as the species population grows, bears have to travel further to obtain food. The research accomplished by the IGBST has easily made the GYE grizzly bear population the most studied North American species (IGBST 2014). Grizzly bears will continue to be monitored and managed but with more authority from State and Tribal agencies. Concerns of Factor A The six recovery ecosystems of bear populations are an acceptable way to monitor the total population. However, with the movement of individual bears, it may be hard to identify total state populations at a given time (WGFD 2016). Yes, some of these bears are collared by state agencies but from experience, not every bear can and will be collared (Turnbull 2015). If the allowable number of total mortalities for independent females cannot exceed 7.6%, 15% for independent males and 7.6% for dependent young, each states harvest quota for mortality will have to continually change during the harvest season. Quotas should be established at the beginning of a hunting season and remain the same throughout the season based on previous estimated population size in each state. The Demographic Monitoring Area (DMA) includes Wyoming, Montana and Idaho and poses variability for harvest quotas. Concerns of Factor D During years of low productivity of high calorie foods for bears, bears will be more apt to move further in search of food. Whitebark pine nut seed availability can be a leading factor in calorie intake for grizzly bears in the fall. If bears move lower in elevation to search for food, human conflicts may very well increase in these years (Turnbull 2015). There should be an amendment for low productive years that would increase the quotas for harvest due to accidental mortalities of bears. The current population of grizzlies is well above the recovery requirement so fluctuations in harvest quotas would not have a large negative impact. In low productivity years, the total mortality could be increased by 25%.	FWS-R6-ES-2016-0042-4361	
Meanwhile grizzlies are losing some of their major food sources - whitebark pine, cutthroat trout, army cutworm moths. This is forcing them to seek more protein (elk, deer, livestock), which humans also want, bringing the bears into more conflict with ranchers and hunters, and bringing the bears into forests and ranchlands (where there are more people) instead of staying in the high country.	Factor A	Hello and thank you for this opportunity to comment on the proposed delisting of the Yellowstone grizzly bear population. I oppose this proposal for many reasons. My comments are dedicated to the memory of Scarface, a magnificent male grizzly who was about 25 years old and was shot and left for dead last fall outside of Jardine, Montana. I have some great memories of watching him - he was a smart and wiley old bear who caused no problems for people, but still got shot. Chris Servheen, the federal coordinator for grizzly bear recovery, is mostly interested in his own career, and delisting is mainly a political and personal objective for him. He is arrogant and selfish and should have been fired long ago. While there is no doubt that grizzlies have come a long way in the Yellowstone area since 1972 when there were maybe 130 left, they have a long way to go. Recovery is in serious jeopardy with at least 70 bears killed last year. Numbers have flatlined and reproduction is probably declining. The population is aging. The Yellowstone ecosystem is under heavy pressure from human population and development, with more wild habitat developed every day. While the heyday of logging and road building has passed, recreational development and activity has skyrocketed. Grizzly habitat is getting crunched. Subdivisions are sprouting up everywhere. I live in Bozeman, where everything is former grizzly habitat (my house included), and the pace of development is mind blowing. Meanwhile grizzlies are losing some of their major food sources - whitebark pine, cutthroat trout, army cutworm moths. This is forcing them to seek more protein (elk, deer, livestock), which humans also want, bringing the bears into more conflict with ranchers and hunters, and bringing the bears into forests and ranchlands (where there are more people) instead of staying in the high country. Not to mention that hundreds of bison are removed from the ecosystem nearly every year due to paranoia about brucellosis. How many grizzlies could those bison feed? Nor can grizzlies safely or effectively reach other populations of grizzlies to the north, meaning the Yellowstone grizzlies are totally isolated. Thus they cannot interbreed with other populations nor supplement their numbers from outside the ecosystem. One can hardly call this recovery. Instead we should be reintroducing grizzlies to the extensive public wildlands of Central Idaho. Delisting will mean turning management over to the states of Montana, Wyoming and Idaho, all of whom are drooling over the chance to hunt grizzlies. This makes me sick. So we spend all this time and effort to recover the grizzly, just so some rednecks can turn them into trophies? Is that the best we can do? I work as a guide and naturalist in Yellowstone Park. The biggest thing my guests want to see is bears and wolves, especially grizzly bears. People pay a lot of money to come here with the hope of seeing these animals. They get to enjoy them and leave them for others to do the same. Hunting predators like grizzlies is selfish and greedy, and is a one-time use. What it really comes down to is respect for other lives than our own. Can we be wise enough and tolerant enough to let the great bear exist on its own merit? Or must we take away the protection they need so we can pretend we have saved them? Attachments DSC07180	FWS-R6-ES-2016-0042-4434	

While the heyday of logging and road building has passed, recreational development and activity has skyrocketed. Grizzly habitat is getting crunched. Subdivisions are sprouting up everywhere.	Factor A	Hello and thank you for this opportunity to comment on the proposed delisting of the Yellowstone grizzly bear population. I oppose this proposal for many reasons. My comments are dedicated to the memory of Scarface, a magnificent male grizzly who was about 25 years old and was shot and left for dead last fall outside of Jardine, Montana. I have some great memories of watching him - he was a smart and wiley old bear who caused no problems for people, but still got shot. Chris Servheen, the federal coordinator for grizzly bear recovery, is mostly interested in his own career, and delisting is mainly a political and personal objective for him. He is arrogant and selfish and should have been fired long ago. While there is no doubt that grizzlies have come a long way in the Yellowstone area since 1972 when there were maybe 130 left, they have a long way to go. Recovery is in serious jeopardy with at least 70 bears killed last year. Numbers have flatlined and reproduction is probably declining. The population is aging. The Yellowstone ecosystem is under heavy pressure from human population and development, with more wild habitat developed every day. While the heyday of logging and road building has passed, recreational development and activity has skyrocketed. Grizzly habitat is getting crunched. Subdivisions are sprouting up everywhere. I live in Bozeman, where everything is former grizzly habitat (my house included), and the pace of development is mind blowing. Meanwhile grizzlies are losing some of their major food sources - whitebark pine, cutthroat trout, army cutworm moths. This is forcing them to seek more protein (elk, deer, livestock), which humans also want, bringing the bears into more conflict with ranchers and hunters, and bringing the bears into forests and ranchlands (where there are more people) instead of staying in the high country. Not to mention that hundreds of bison are removed from the ecosystem nearly every year due to paranoia about brucellosis. How many grizzlies could those bison feed? Nor can grizzlies safely or effectively reach other populations of grizzlies to the north, meaning the Yellowstone grizzlies are totally isolated. Thus they cannot interbreed with other populations nor supplement their numbers from outside the ecosystem. One can hardly call this recovery. Instead we should be reintroducing grizzlies to the extensive public wildlands of Central Idaho. Delisting will mean turning management over to the states of Montana, Wyoming and Idaho, all of whom are drooling over the chance to hunt grizzlies. This makes me sick. So we spend all this time and effort to recover the grizzly, just so some rednecks can turn them into trophies? Is that the best we can do? I work as a guide and naturalist in Yellowstone Park. The biggest thing my guests want to see is bears and wolves, especially grizzly bears. People pay a lot of money to come here with the hope of seeing these animals. They get to enjoy them and leave them for others to do the same. Hunting predators like grizzlies is selfish and greedy, and is a one-time use. What it really comes down to is respect for other lives than our own. Can we be wise enough and tolerant enough to let the great bear exist on its own merit? Or must we take away the protection they need so we can pretend we have saved them? Attachments DSC07180	FWS-R6-ES-2016-0042-4434	
Grizzly populations face many uncertainties relating to food sources, climate change, and the like.	Factor A	Delisting is premature. Grizzly populations face many uncertainties relating to food sources, climate change, and the like. The additional threat of hunting may very well cause another population collapse.	FWS-R6-ES-2016-0042-4559	
Of the 5 suggested remaining sites that could sustain bears, Selkirk, the Northern Cascades, and the Cabinet-Yaak area, apparently have the space but lack the resources to inhabit grizzly bears, as those pops. have been lost. The Bitterroot Recovery Zone is a laughable suggestion, as they apparently are barren of bears though they sit just atop and to the west of Yellowstone. The Northern Continental Divide Ecosystem is evidently the only thriving (unprotected?) bear population, this may be due to being the only site large enough to absorb human interference.	Factor A	Hello, Being clear that this initiative isn't related to the increase in size of the Grizzly population in Yellowstone Park, but rather the management of space to allow enough "secure habitat" to accommodate the growing, yet minuscule in the larger view of saving a species, would have garnered more respect. By the estimations in you proposal, the bear population in the lower 48 is approx. 1680 bears, spread out between the 6 areas including Yellowstone. Naturalists' do not consider the subject county nor the situation enough in number to sustain a healthy species. According to EParks, there are approx. 1,300 grizzly bears living in the wild today. In the 1800's, an estimated 50,000 grizzlies populated the lower 48 between the Great Plains and the Pacific Coast. The range of occupation now is 2% of it's former natural habitat. (www.eparks.org) I apologize for the improper documentation, but I assure you all data is valid so far is available on available websites. It widely reported that 80% of bear mortality rates are caused by humans. Their official and unofficial encroachment on "secure habitat" for bears, the need to put bears down due to lack of fear of humans, as the bears have become spectacles for those in cars, watching as the bears feed from garbage dumpsters, among other reasons bears and humans clash. Of the 5 suggested remaining sites that could sustain bears, Selkirk, the Northern Cascades, and the Cabinet-Yaak area, apparently have the space but lack the resources to inhabit grizzly bears, as those pops. have been lost. The Bitterroot Recovery Zone is a laughable suggestion, as they apparently are barren of bears though they sit just atop and to the west of Yellowstone. The Northern Continental Divide Ecosystem is evidently the only thriving (unprotected?) bear population, this may be due to being the only site large enough to absorb human interference. Losing protection, this still endangered species, the Yellowstone grizzly, hasn't a large enough population to survive, and without repeating the same strategies implemented in 1974, will become an American National Park without grizzly bears. This will most likely, as with toying with the Yellowstone wolf population, lead to the eventual extinction of a species so ingrained in North American history that it can't be understated. Should you outlive the fruition of the decreasing 2% of habitable land for this national symbol to exist, the history of these misguided intentions, taking another step closer to snuffing out of this species, will still be with us all. Something of America will have been lost, and all your words will not bring it back.	FWS-R6-ES-2016-0042-4554	
As you know, this population also remains severely isolated and states do not have regulations in place that could allow the Yellowstone bears to connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed.	Factor A	See attached file(s) Attachments 160509_fws-r6-es-2016-0042-0001_keep_esa_protections_for_yellowstone_grizzlies	FWS-R6-ES-2016-0042-4459	

Is there a present or threatened destruction, modification, or curtailment of species' habitat or range? (In some cases, yes.)	Factor A	Please don't remove this beautiful and iconic species from the list. Your criteria (http://nctc.fws.gov/pubs9/delisting.pdf): Is there a present or threatened destruction, modification, or curtailment of species' habitat or range? (In some cases, yes.) Is species subject to overutilization for commercial, recreational, scientific, or educational purposes? (Hunting is, arguably, recreational utilization; so, yes.) Is disease or predation a factor? (If hunting is counted as predation, yes.) Are there inadequate existing regulatory mechanisms in place outside the ESA (taking into account the efforts by the States and other organizations to protect the species or habitat)? (Perhaps. But we know how that goes. Look at Florida's massive bear hunt.) Are other natural or manmade factors affecting its continued existence? (Agriculture. Tourism. Hunting. Yes.) People already camp right at the park borders to snipe wolves as they cross the invisible boundary into unprotected space. We all know what's going to happen to the bears as soon as they lose their protected status. Every trophy hunter will be standing in line to take one down. California lost it's great bears and wolves years ago. It would be a tremendous shame to see it happen elsewhere. https://youtu.be/oZ7tSGxGue0	FWS-R6-ES-2016-0042-4583	
USFWS's proposal x does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. Å	Factor A	I am opposed to the delisting of grizzly bears. A few of the reasons but not even close to all of the reasons are as follows: **The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. **The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. **The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). There is no reason to trophy hunt - it serves the interest of a tiny portion of the population who want to make rugs from these iconic species that are part of our American heritage. **USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. **What's the Rush? There are too many unknowns right now, regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population. Why not wait five years to see how the population is responding to these threats?	FWS-R6-ES-2016-0042-4569	
The proposed rule does not address genetic isolation of the bears. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Å	Factor A	There are several reasons to not delist the Grizzly Bear: The proposed rule does not address genetic isolation of the bears. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - Declining food sources. Historically bears dependent on 4 food sources - 2 of which (whitebark pine and cutthroat trout) are disappearing and moths, their third main food source, are unreliable food source due to pesticides. - Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. - Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. - Grizzlies occupy only 1% of their historic range. - Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. - If hunting is allowed, there should be a 5-year moratorium on hunting until states can prove that they can manage the grizzly population effectively. - If hunting is allowed, there must be buffer zones around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park. - DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states known for their hatred and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and most Americans (55%) oppose delisting. Even more Americans (68%) oppose hunting of grizzly bears if delisted. - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears. - GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, it is particularly vulnerable to excessive killing by humans. Last year, saw 50 grizzlies killed by humans in the	FWS-R6-ES-2016-0042-4679	

Natural movement of bears between the Greater Yellowstone (GYE) and Northern Continental Divide (NCDE) ecosystems is paramount for long-term persistence of the grizzly bear population. As grizzly bears in the GYE have expanded their range in recent decades, the gap between the NCDE and GYE populations has narrowed, giving promise to the eventuality that, with time, the exchange of genetic material between the populations can occur naturally. However, with the proposed plans to allow non-discretionary killing of grizzly bears that wander outside the Demographic Monitoring Area (DMA), the likelihood for successful dispersal is squandered. Those Yellowstone bears that risk exploring outside the DMA are the very ones who hold the most promise to connect with the NCDE; yet they are also most likely to die before the chance for connectivity can ever take root. State management predicated on partitioning mortalities by state shows the complete lack of comprehension by state wildlife managers of population genetics, population dynamics, or anything even remotely close to the concept of an ecosystem and is anathema to development of any functional notion of connectivity. These kinds of anachronistic views of managing bears by numbers are a sorry relic of the failed North American Wildlife Management Model, a management strategy that predates the discovery of DNA, the science of ecology, and advances in mathematical modeling. It is touted as a success only because its adherents suffer collectively in the delusional echo-chamber of shifting baselines syndrome. This method of purported management is akin to treating bears like coins in the bank and is conceptually and scientifically bankrupt	Factor A	See attached file(s) Attachments JSchmitt_Proposed Rule comments_2016	FWS-R6-ES-2016-0042-4727	
The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001).	Factor A	The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. -The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. -The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). -USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat.	FWS-R6-ES-2016-0042-4717	
THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc.	Factor A	THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources.	FWS-R6-ES-2016-0042-4805	

EXPERTS OPPOSE REMOVING GRIZZLIES FROM THE ENDANGERED SPECIES LIST. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted. - THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. -	Factor A	There are several reasons to not delist the Grizzly Bear: The proposed rule does not address genetic isolation of the bears. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - Declining food sources. Historically bears dependent on 4 food sources - 2 of which (whitebark pine and cutthroat trout) are disappearing and moths, their third main food source, are unreliable food source due to pesticides. - Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. - Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. - Grizzlies occupy only 1% of their historic range. - Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. - If hunting is allowed, there should be a 5-year moratorium on hunting until states can prove that they can manage the grizzly population effectively. - If hunting is allowed, there must be buffer zones around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park. - DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states known for their hatred and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and most Americans (55%) oppose delisting. Even more Americans (68%) oppose hunting of grizzly bears if delisted. - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears. - GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, it is particularly vulnerable to excessive killing by humans. Last year, saw 50 grizzlies killed by humans in the	FWS-R6-ES-2016-0042-4679	
If there are fewer and fewer large grazing animals for the grizzlies to eat, as well as no white-bark pine nuts or trout, it will definitely adversely affect the grizzly population and its ability to grow.	Factor A	With less food sources for grizzlies, it is not a good idea to remove the Greater Yellowstone Ecosystem Population from the Federal List of Endangered and Threatened Wildlife. Also, even though the population is slowly growing, less than a thousand bears is not many animals. Also, the states of Wyoming, Idaho and Montana are not protecting their wild ruminant populations very well, and most are declining because of failure of the breeding age females to have viable young that survive to adulthood. A very high prevalence of newborns have developmental malformations/birth defects. Any state that allows over 50% of some wild animal populations to be born with birth defects without doing something to find and mitigate the cause can't be trusted to protect predators, especially grizzlies and wolves. They even claim the wolves and grizzlies kill so many ruminant young that it causes population declines in the wild ruminant populations rather than trying to do something about the real cause of the declining ruminant populations. This is being less than truthful. It is actually the birth defects that either kill the newborn ruminants outright or make them much more susceptible to being caught by predators that are causing the low recruitment rates. I have seen no mention of the birth defects and adverse health issues on the ruminant newborns in the discussions concerning delisting of the grizzly. Has the USFWS done anything to mitigate the birth defects? If there are fewer and fewer large grazing animals for the grizzlies to eat, as well as no white-bark pine nuts or trout, it will definitely adversely affect the grizzly population and its ability to grow. The state game departments have completely ignored studies concerning the birth defects on ruminants and have consistently ignored all reports of birth defects on birds, mammals and amphibians. The agriculture departments have ignored the birth defects and health issues on domestic livestock that kill thousands each year and again the wild predators often are blamed. Since so many animals, including wolves have similar birth defects, it is possible that grizzlies also do. You should make certain that the grizzly cubs are not being similarly affected before even considering delisting. Human newborns have the same or similar birth defects and these serious health issues are increasing each year, so there is no reason to just assume that grizzly cubs are not being affected. Grizzlies eat foliage, like ruminants and they eat fruit, tubulars and meat, just like humans. Have you addressed this issue at all before recommending delisting? I am adamantly opposed to delisting the grizzly anywhere until all issues that may affect the grizzly populations are addressed, especially the issue of high prevalences of developmental malformations on newborns. See the links to the studies below: 2002 study: http://www.ncbi.nlm.nih.gov/pubmed/12602857; 2011 study: doi:10.2461/wbp.2011.7.13 2015 study: http://dx.doi.org/10.4172/2375-446X.1000132; Thank you for your consideration of this comment.	FWS-R6-ES-2016-0042-4869	

When I asked about population numbers at the public meeting in Bozeman, MT on April 12, 2016, Servheen stated that flights for population counts could be grounded for weather or several other reasons. If there are not a consistent number of annual flights for population reporting at even intervals throughout the seasons, how can these population counts be relied upon as accurate and be trusted to effectively and adequately manage population numbers if there are holes in the data? Using flight visuals for population reporting is also unreliable in regard to determining the sex of a bear, because unless a female has cubs with her, females and males cannot be distinguished from one another in an airplane. I believe too much emphasis has been placed on population numbers, disregarding the importance of habitat and food sources	Factor A	Please see attachment. Attachments FWS comment	FWS-R6-ES-2016-0042-4891	
As a trained conservationist, with a background in field biology work, I am adamantly opposed to this proposal. I have followed the research around Yellowstone grizzlies since college and am well aware of the issues affecting the Great Yellowstone Grizzly Bear population. This population of bears are an island population - there are significant barriers to this population being able to connect with other populations of bears due to habitat fragmentation which leads to genetic isolation and genetic inbreeding. Given the grizzlies slow reproduction rate, loss of food sources like the white bark pine nuts, potential declining populations of cutthroat trout due to climate change, habitat losses outside of the park, I feel that this proposal is ill advised. With the reintroduction of wolves, the ungulate population in parts of the of the Park appear to be in decline - another food source loss will potentially cause bears to roam farther in search of food. The unknown and potential flora losses, which are a large part of the bears diet, due to climate change cannot be overlooked and could contribute to further expansion of territories outside the Park. As a keystone species, the grizzlies influence on helping protect other sensitive species, like wolverines and lynx (as well as other non-mega fauna), is significant and crucial to species diversity in the northern Rockies. I lived in western Montana for 6 years and did field biology work, which involved direct interaction with the public, as well as working in the private sector during the winter months. The shoot, shovel and shut up mentality is still very much alive there with some of the population, which would be all to eager to illegally hunt bears. And that is to say nothing about the state governments in the area which can be heavily influenced by the cattle and timber extraction industries. I do not doubt that hunting grizzlies will be a trophy sport if the state is able to regulate the bear populations just like Idaho wants to do with wolves and grizzlies - and that is unacceptable on every level. The FWS is supposed to protect species in need for their benefit, regardless of political influence. Has the FWS looked at all the encompassing issues surrounding the bears? What about potential long term affects to the population? I believe that this has not happened. Don't play to the pressure of the states of Montana, Idaho, or Wyoming as they have shown previous unacceptable management plans for other species - i.e wolves. Delisting grizzlies in the Greater Yellowstone Ecosystem will have negative repercussions to that species, and many more. Please take the ecological high ground, the long term vision, and don't cave to political pressure. My family visits Yellowstone as much asd possible and my children would like to see a wild grizzly bear. They are depending on your agency to make the right choice. Please - do not delisit the Yellowstone grizzly bear. Look at the science not the politics.	Factor A	As a trained conservationist, with a background in field biology work, I am adamantly opposed to this proposal. I have followed the research around Yellowstone grizzlies since college and am well aware of the issues affecting the Great Yellowstone Grizzly Bear population. This population of bears are an island population - there are significant barriers to this population being able to connect with other populations of bears due to habitat fragmentation which leads to genetic isolation and genetic inbreeding. Given the grizzlies slow reproduction rate, loss of food sources like the white bark pine nuts, potential declining populations of cutthroat trout due to climate change, habitat losses outside of the park, I feel that this proposal is ill advised. 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The Service fails to fully acknowledge the scale of climate change and its effect on habitat and food sources for the GYE grizzly. Alpine regions that the army cutworm moths depend upon are shrinking, nonnative trout are encroaching on cutthroat trout, and epidemics are decimating WBP. Grizzly bears rely heavily on these three food sources, but there is little evidence to suggest that the FWS took this into account when proposing delisting. FWS relies upon the bear's ability to adapt to changing food availability as evidence of population viability. Grizzly bears do adapt to variable food availability, but food sources are becoming scarce at a horrifyingly fast pace. Climate change's effects on these sources will only hasten reduction, leaving little time for adequate adaptation from bears.	Factor A	Please see attachment. Attachments FWS comment	FWS-R6-ES-2016-0042-4891	

I am concerned that FWS is using 1998 as a baseline, as this is before the WBP epidemic. Grizzly numbers may have been rising and the ecosystem able to support a growing population in 1998, however the GYE now has many stressors that were not as prevalent as in 1998. Climate change, blister rust, and pine beetles have decimated WBP populations. In the previous proposal of the 2007 delisting of grizzlies, WBP was stated as one of four important food sources. FWS lost its appeal in the Ninth Circuit Court in 2011 because the Service was found to be arbitrary and capricious in its consideration of grizzlies' use of WBP. In the current proposal, FWS merely claims WBP "can be" an important food source, and the research used to support this claim is not comprehensive in consideration to climate change and epidemics, making the argument once again arbitrary and capricious. The current rule glosses over and deemphasizes the role WBP has in a GYE grizzly's diet to serve as a base for delisting. The Service's research found grizzly bears' selection of WBP seeds has declined since 2000, coinciding with WBP population declines reaching epidemic proportions, but the agency fails to acknowledge the likely causal connection of stark and rapid declines of WBP populations being a limiting factor for grizzly bears using it as a food source. The proposal states one-third of grizzly bears do not have WBP in their home range, but does not elaborate to clarify if a lack of WBP is because WBP does not grow in those regions or if those populations have been decimated by beetles and blister rust, therefore removing that vital food source from the bear's diet. The studies conducted are vastly insufficient in duration to determine the effects of climate change, reduced viable habitat, dwindling food sources, and how these stressors affect grizzly populations. The FWS is hasty, unreasonable, and offers dubious scientific results as evidence in favor of delisting. The Service is also relying on the ability to "emergency relist" grizzlies if need be. More stability in habitat, food sources, and reproduction is necessary before delisting can occur, otherwise the	Factor A	Please see attachment. Attachments FWS comment	FWS-R6-ES-2016-0042-4891	
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Grizzlies in the GYE are facing catastrophic losses to several of their key food sources, such as whitebark pine and cutthroat trout. The service's recent research on whitebark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy whitebark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals. A	Factor A	Grizzlies in the GYE are facing catastrophic losses to several of their key food sources, such as whitebark pine and cutthroat trout. The service's recent research on whitebark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy whitebark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals. Grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary. The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat.	FWS-R6-ES-2016-0042-4943	

The delisting of GYE grizzly bears now, during increasing Climate Change uncertainty and scientifically accepted understanding of changing or reduced grizzly bear habitats including food, water and shelter resources would absolutely reduce the GYE grizzly bear population (likely other lower 48 grizzly bears and their populations too), and their conservation efforts and funding, which would definitely and significantly compromise the viability of these GYE grizzly bears in both the short-term, and the long-term for America's Future generations.	Factor A	As a wildlife biologist, I have worked with several USFWS Threatened and Endangered Species over the past 30 years, with several federal land management agencies. I absolutely disagree with the USFWSs' totally premature and significantly and inadequately designed and planned proposal to delist the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Threatened Species Protections of the Endangered Species Act which the grizzly bears have been under for the last 40 years for these several important reasons. 1. While the numbers of grizzly bears in GYE are up since the low in the late 1970s and early 1980s, this has taken more than three decades of significant and serious legally established protections and considerable conservation efforts on many different levels. The delisting of GYE grizzly bears now, during increasing Climate Change uncertainty and scientifically accepted understanding of changing or reduced grizzly bear habitats including food, water and shelter resources would absolutely reduce the GYE grizzly bear population (likely other lower 48 grizzly bears and their populations too), and their conservation efforts and funding, which would definitely and significantly compromise the viability of these GYE grizzly bears in both the short-term, and the long-term for America's Future generations. All the important and comprehensive grizzly bear conservation measures must be established and in place before delisting proposal is considered, including all the funding, ecological, scientific, social, and economic issues and concerns. Unfortunately, none of these important conservation measures, issues, and concerns are adequately addressed yet, so this grizzly delisting proposal must not continue. 2. Unfortunately, after delisting, the likely legal hunting of grizzly bears in the states of ID, MT, and WY, would NOT be responsible or reasonable for the GYE grizzly bear population to continue to be healthy and viable. Also, unfortunately, the illegal killing of grizzly bears would significantly rise, especially with little or no funding, efforts or motivation to prosecute violations of important wildlife regulations. I am absolutely against any legal hunting of grizzly bears in the lower 48 contiguous United States for many responsible reasons, and especially for the hunting of grizzly bears would definitely be damaging to grizzly bear conservation and the GYE grizzly bear population would be significantly reduced. Any consideration or allowance of legal grizzly bear hunting in any state at anytime in the future must absolutely be denied before proposal is reasonable, responsible, or expectable. 3. Absolutely, important comprehensive Grizzly Bear Habitats on federal, state and local lands in all the appropriate NW States must be established and well coordinated first, before any delisting proposal should be considered. Seriously, grizzly bear habitats and their continued management, preservation and conservation for grizzly bears in the states of ID, MT, and WY on federally managed public lands and national forests have NOT been well coordinated, adequate, legally binding, or secured before this delisting proposal was made. Therefore, this proposal should be stopped immediately. 4. The Endangered Species Act requires tribal nations consultation and cooperation which the USFWS has NOT properly handled, managed, or considered. 5. To establish the GYE grizzly bear population as a distinct population segment is definitely and absolutely the most scientifically, ecologically, and socially irresponsible way to continue conservation and protection of a healthy functioning viable grizzly bear population in the GYE.	FWS-R6-ES-2016-0042-5460	
Seriously, grizzly bear habitats and their continued management, preservation and conservation for grizzly bears in the states of ID, MT, and WY on federally managed public lands and national forests have NOT been well coordinated, adequate, legally binding, or secured before this delisting proposal was made. Therefore, this proposal should be stopped immediately.	Factor A	As a wildlife biologist, I have worked with several USFWS Threatened and Endangered Species over the past 30 years, with several federal land management agencies. I absolutely disagree with the USFWSs' totally premature and significantly and inadequately designed and planned proposal to delist the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Threatened Species Protections of the Endangered Species Act which the grizzly bears have been under for the last 40 years for these several important reasons. 1. While the numbers of grizzly bears in GYE are up since the low in the late 1970s and early 1980s, this has taken more than three decades of significant and serious legally established protections and considerable conservation efforts on many different levels. The delisting of GYE grizzly bears now, during increasing Climate Change uncertainty and scientifically accepted understanding of changing or reduced grizzly bear habitats including food, water and shelter resources would absolutely reduce the GYE grizzly bear population (likely other lower 48 grizzly bears and their populations too), and their conservation efforts and funding, which would definitely and significantly compromise the viability of these GYE grizzly bears in both the short-term, and the long-term for America's Future generations. All the important and comprehensive grizzly bear conservation measures must be established and in place before delisting proposal is considered, including all the funding, ecological, scientific, social, and economic issues and concerns. Unfortunately, none of these important conservation measures, issues, and concerns are adequately addressed yet, so this grizzly delisting proposal must not continue. 2. Unfortunately, after delisting, the likely legal hunting of grizzly bears in the states of ID, MT, and WY, would NOT be responsible or reasonable for the GYE grizzly bear population to continue to be healthy and viable. Also, unfortunately, the illegal killing of grizzly bears would significantly rise, especially with little or no funding, efforts or motivation to prosecute violations of important wildlife regulations. I am absolutely against any legal hunting of grizzly bears in the lower 48 contiguous United States for many responsible reasons, and especially for the hunting of grizzly bears would definitely be damaging to grizzly bear conservation and the GYE grizzly bear population would be significantly reduced. Any consideration or allowance of legal grizzly bear hunting in any state at anytime in the future must absolutely be denied before proposal is reasonable, responsible, or expectable. 3. Absolutely, important comprehensive Grizzly Bear Habitats on federal, state and local lands in all the appropriate NW States must be established and well coordinated first, before any delisting proposal should be considered. Seriously, grizzly bear habitats and their continued management, preservation and conservation for grizzly bears in the states of ID, MT, and WY on federally managed public lands and national forests have NOT been well coordinated, adequate, legally binding, or secured before this delisting proposal was made. Therefore, this proposal should be stopped immediately. 4. The Endangered Species Act requires tribal nations consultation and cooperation which the USFWS has NOT properly handled, managed, or considered. 5. To establish the GYE grizzly bear population as a distinct population segment is definitely and absolutely the most scientifically, ecologically, and socially irresponsible way to continue conservation and protection of a healthy functioning viable grizzly bear population in the GYE.	FWS-R6-ES-2016-0042-5460	

USFWS's proposal x does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning x habitat. Å	Factor A	Grizzlies in the GYE are facing catastrophic losses to several of their key food sources, such as whitebark pine and cutthroat trout. The service's recent research on whitebark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy whitebark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals. Grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary. The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat.	FWS-R6-ES-2016-0042-4943	
I believe strongly in the protection afforded the Greater Yellowstone Grizzly Bears under the Endangered Species Act as the best means to ensure that this population of bears will continue to roam the forests and mountains of the Greater Yellowstone Ecosystem for years to come. I respectfully request that FWS halt the process of removal and begin a thorough study of the effects of climate change on the Grizzly Bear in the present as well as in the future prior to making its decision.	Factor A	I am very concerned about the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. According to Mr. Doug Peacock, an expert on the Greater Yellowstone Grizzly Bears, evidence indicates that the Grizzly population is already being impacted by climate change in so much as reducing one of its major food sources, e.g. the Whitebark Pine tree to near extinction in the last 10 years. It remains to be seen the overall effect, but at one time, the nuts from the Whitebark Pine, a species of pine that grew abundantly at higher elevations, provided an especially valuable food source for mother bears with the added advantage that vulnerable mother bears and their young tended to stay at these higher, more remote and therefore safer locations, where the trees grew. Due to the near extinction of the Whitebark Pine, the safety that accompanied this food source no longer exists. Additionally, the Grizzly population is likely to suffer severe reductions in their population if the proposed removal from the Federal List of Endangered and Threatened Wildlife is approved due to trophy hunts in Wyoming, Montana, and Idaho. I understand from available information that these trophy hunts are likely to begin within one year of "removal". If sport hunting and other causes of mortality exceed the number of cubs born each year, the Grizzly's numbers could be reduced within a very short amount of time. I believe strongly in the protection afforded the Greater Yellowstone Grizzly Bears under the Endangered Species Act as the best means to ensure that this population of bears will continue to roam the forests and mountains of the Greater Yellowstone Ecosystem for years to come. I respectfully request that FWS halt the process of removal and begin a thorough study of the effects of climate change on the Grizzly Bear in the present as well as in the future prior to making its decision.	FWS-R6-ES-2016-0042-5486	

The Service needs to strengthen habitat protections and mortality limits in the proposed rule.	Factor A	Docket No. FWS-R6-ES-2016-0042 RE: Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. The historic comeback of the Yellowstone grizzly bear population is truly a remarkable achievement. But the current proposal threatens progress made to date. The Service is rushing to delist the grizzly bear before it knows how the Northern Rockies states and other federal agencies plan to manage it. It is unacceptable to proceed with delisting when the state and federal plans governing how this population will be managed are incomplete and therefore, unenforceable. Further, the Service's current proposal doesn't provide grizzlies with enough protections to ensure their long-term recovery. We can't afford to be careless with this species. There is no need to rush this process, but that's exactly what the Service appears to be doing. I call on the Service to put the proposed delisting rule on hold for the following reasons: 1) The Service needs to strengthen habitat protections and mortality limits in the proposed rule. 2) State and federal management plans detailing how this population will be managed are incomplete and must be updated to provide enforceable protections. 3) The Service must rectify inconsistencies that currently exist in the set of documents (the proposed rule, the recovery plan, and the conservation strategy) detailing how this population will be managed post-delisting. The Service continues to work with the state and federal agencies involved, it must prioritize the following: -Strong protections for the core population and habitat. -Restored connectivity with other grizzly bear populations by protecting bears in areas important to connectivity, allowing the population to continue to expand and securing habitat on public lands in between populations. -Continued and enhanced efforts to minimize conflicts between grizzly bears and people, thereby improving social tolerance and public acceptance for the bears throughout their range. -Adequate funding to support ongoing grizzly bear recovery. Idaho, Montana and Wyoming's state grizzly bear management plans must be revised to provide "adequate regulatory mechanisms" to conserve the species - a requirement of the Endangered Species Act. Wyoming has yet to finalize a revised grizzly bear state management plan, and the draft is not in line with important details of the Service's delisting proposal. Idaho and Montana have not yet set a public timeline for revising or allowing public review of revisions to their grizzly bear management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the "adequate regulatory mechanisms" they need. In addition, the Forest Service should allow for public review of any changes to the 2006 forest plan amendments. Currently the timeline for any such process is not public knowledge. Given that the Forest Service manages over 65 percent of suitable habitat in the ecosystem; this is a critical missing piece of the puzzle. Throughout the Northern Rockies, Defenders works closely with management agencies, other conservation groups and local residents to minimize conflict between bears and people. Since 1998, Defenders has invested over a million dollars on close to 300 on-the-ground projects including installing electric fencing around summer bear habitats, purchasing bear resistant storage containers for residents, and as a wildlife biologist, I have worked with several USFWS threatened and endangered species over the past 30 years, with several federal land management agencies. I absolutely disagree with the USFWS' totally premature and significantly and inadequately designed and planned proposal to delist the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Threatened Species Protections of the Endangered Species Act which the grizzly bears have been under for the last 40 years for these several important reasons. 1. While the numbers of grizzly bears in GYE are up since the low in the late 1970s and early 1980s, this has taken more than three decades of significant and serious legally established protections and considerable conservation efforts on many different levels. The delisting of GYE grizzly bears now, during increasing Climate Change uncertainty and scientifically accepted understanding of changing or reduced grizzly bear habitats including food, water and shelter resources would absolutely reduce the GYE grizzly bear population (likely other lower 48 grizzly bears and their populations too), and their conservation efforts and funding, which would definitely and significantly compromise the viability of these GYE grizzly bears in both the short-term, and the long-term for America's Future generations. All the important and comprehensive grizzly bear conservation measures must be established and in place before delisting proposal is considered, including all the funding, ecological, scientific, social, and economic issues and concerns. Unfortunately, none of these important conservation measures, issues, and concerns are adequately addressed yet, so this grizzly delisting proposal must not continue. 2. Unfortunately, after delisting, the likely legal hunting of grizzly bears in the states of ID, MT, and WY, would NOT be responsible or reasonable for the GYE grizzly bear population to continue to be healthy and viable. Also, unfortunately, the illegal killing of grizzly bears would significantly rise, especially with little or no funding, efforts or motivation to prosecute violations of important wildlife regulations. I am absolutely against any legal hunting of grizzly bears in the lower 48 contiguous United States for many responsible reasons, and especially for the hunting of grizzly bears would definitely be damaging to grizzly bear conservation and the GYE grizzly bear population would be significantly reduced. Any consideration or allowance of legal grizzly bear hunting in any state at anytime in the future must absolutely be denied before proposal is reasonable, responsible, or expectable. 3. Absolutely, important comprehensive Grizzly Bear Habitats on federal, state and local lands in all the appropriate NW States must be established and well coordinated first, before any delisting proposal should be considered. Seriously, grizzly bear habitats and their continued management, preservation and conservation for grizzly bears in the states of ID, MT, and WY on federally managed public lands and national forests have NOT been well coordinated, adequate, legally binding, or secured before this delisting proposal was made. Therefore, this proposal should be stopped immediately. 4. The Endangered Species Act requires tribal nations consultation and cooperation which the USFWS has NOT properly handled, managed, or considered. 5. To establish the GYE grizzly bear population as a distinct population segment is definitely and absolutely the most scientifically, ecologically, and socially responsible way to continue conservation and protection of a healthy functioning viable grizzly bear population in the GYE.	FWS-R6-ES-2016-0042-5524	
Reducing conflicts between humans and grizzly bears must be much more adequately addressed in any reasonable or responsible grizzly delisting proposal. Reducing human-grizzly bear conflicts must be comprehensive in scope including the increasingly exponential negative effects of climate change, human population growth, dispersal, development, travel, increasing recreation of all sorts, and increasing energy development of the GYE and its effects on individual grizzly bears as well as grizzly bear habitats, connecting corridors and the ever increasing deaths of individual grizzly bears due to hunting elk, deer, bison, etc.	Factor A	As a wildlife biologist, I have worked with several USFWS threatened and endangered species over the past 30 years, with several federal land management agencies. I absolutely disagree with the USFWS' totally premature and significantly and inadequately designed and planned proposal to delist the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Threatened Species Protections of the Endangered Species Act which the grizzly bears have been under for the last 40 years for these several important reasons. 1. While the numbers of grizzly bears in GYE are up since the low in the late 1970s and early 1980s, this has taken more than three decades of significant and serious legally established protections and considerable conservation efforts on many different levels. The delisting of GYE grizzly bears now, during increasing Climate Change uncertainty and scientifically accepted understanding of changing or reduced grizzly bear habitats including food, water and shelter resources would absolutely reduce the GYE grizzly bear population (likely other lower 48 grizzly bears and their populations too), and their conservation efforts and funding, which would definitely and significantly compromise the viability of these GYE grizzly bears in both the short-term, and the long-term for America's Future generations. All the important and comprehensive grizzly bear conservation measures must be established and in place before delisting proposal is considered, including all the funding, ecological, scientific, social, and economic issues and concerns. Unfortunately, none of these important conservation measures, issues, and concerns are adequately addressed yet, so this grizzly delisting proposal must not continue. 2. Unfortunately, after delisting, the likely legal hunting of grizzly bears in the states of ID, MT, and WY, would NOT be responsible or reasonable for the GYE grizzly bear population to continue to be healthy and viable. Also, unfortunately, the illegal killing of grizzly bears would significantly rise, especially with little or no funding, efforts or motivation to prosecute violations of important wildlife regulations. I am absolutely against any legal hunting of grizzly bears in the lower 48 contiguous United States for many responsible reasons, and especially for the hunting of grizzly bears would definitely be damaging to grizzly bear conservation and the GYE grizzly bear population would be significantly reduced. Any consideration or allowance of legal grizzly bear hunting in any state at anytime in the future must absolutely be denied before proposal is reasonable, responsible, or expectable. 3. Absolutely, important comprehensive Grizzly Bear Habitats on federal, state and local lands in all the appropriate NW States must be established and well coordinated first, before any delisting proposal should be considered. Seriously, grizzly bear habitats and their continued management, preservation and conservation for grizzly bears in the states of ID, MT, and WY on federally managed public lands and national forests have NOT been well coordinated, adequate, legally binding, or secured before this delisting proposal was made. Therefore, this proposal should be stopped immediately. 4. The Endangered Species Act requires tribal nations consultation and cooperation which the USFWS has NOT properly handled, managed, or considered. 5. To establish the GYE grizzly bear population as a distinct population segment is definitely and absolutely the most scientifically, ecologically, and socially responsible way to continue conservation and protection of a healthy functioning viable grizzly bear population in the GYE.	FWS-R6-ES-2016-0042-5460	

The Service continues to work with the state and federal agencies involved, it must prioritize the following: -Strong protections for the core population and habitat.-Restored connectivity with other grizzly bear populations by protecting bears in areas important to connectivity, allowing the population to continue to expand and securing habitat on public lands in between populations.	Factor A	Docket No. FWS-R6-ES-2016-0042 RE: Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. The historic comeback of the Yellowstone grizzly bear population is truly a remarkable achievement. But the current proposal threatens progress made to date. The Service is rushing to delist the grizzly bear before it knows how the Northern Rockies states and other federal agencies plan to manage it. It is unacceptable to proceed with delisting when the state and federal plans governing how this population will be managed are incomplete and therefore, unenforceable. Further, the Service's current proposal doesn't provide grizzlies with enough protections to ensure their long-term recovery. We can't afford to be careless with this species. There is no need to rush this process, but that's exactly what the Service appears to be doing. I call on the Service to put the proposed delisting rule on hold for the following reasons: 1) The Service needs to strengthen habitat protections and mortality limits in the proposed rule. 2) State and federal management plans detailing how this population will be managed are incomplete and must be updated to provide enforceable protections. 3) The Service must rectify inconsistencies that currently exist in the set of documents (the proposed rule, the recovery plan, and the conservation strategy) detailing how this population will be managed post-delisting. The Service continues to work with the state and federal agencies involved, it must prioritize the following: -Strong protections for the core population and habitat. -Restored connectivity with other grizzly bear populations by protecting bears in areas important to connectivity, allowing the population to continue to expand and securing habitat on public lands in between populations. -Continued and enhanced efforts to minimize conflicts between grizzly bears and people, thereby improving social tolerance and public acceptance for the bears throughout their range. -Adequate funding to support ongoing grizzly bear recovery. Idaho, Montana and Wyoming's state grizzly bear management plans must be revised to provide "adequate regulatory mechanisms" to conserve the species - a requirement of the Endangered Species Act. Wyoming has yet to finalize a revised grizzly bear state management plan, and the draft is not in line with important details of the Service's delisting proposal. Idaho and Montana have not yet set a public timeline for revising or allowing public review of revisions to their grizzly bear management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the "adequate regulatory mechanisms" they need. In addition, the Forest Service should allow for public review of any changes to the 2006 forest plan amendments. Currently the timeline for any such process is not public knowledge. Given that the Forest Service manages over 65 percent of suitable habitat in the ecosystem; this is a critical missing piece of the puzzle. Throughout the Northern Rockies, Defenders works closely with management agencies, other conservation groups and local residents to minimize conflict between bears and people. Since 1998, Defenders has invested over a million dollars on close to 300 on-the-ground projects including installing electric fencing around numerous bear attractants, purchasing bear resistant garbage containers for residents,	FWS-R6-ES-2016-0042-5524	
It is stated that bear numbers have increased in the core recovery area, but the underlying assumptions to these statements may be inherently flawed rendering these numbers inaccurate. If the assumptions in the PRD and supporting reports do not hold true in the future, grizzly populations may be adversely impacted. The prudent approach now is to maintain their current listing status. Therefore, I oppose delisting of GYE grizzly bears under management conditions as described in the current FWS PRD and Conservation Strategy.	Factor A	Cynthia Guerra, May 2016 Comments regarding FWS Docket ID: FWS-R6-ES-2016-0042: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife It has been suggested that current management actions have led to an increase in numbers of grizzly bears in the Greater Yellowstone Ecosystem (GYE). But the published Proposed Rule Document (PRD) and supporting reports state that grizzly bears remain "a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality." Therefore, continuation of current management practices is required to help assure a healthy population of the species in the future. It is stated that bear numbers have increased in the core recovery area, but the underlying assumptions to these statements may be inherently flawed rendering these numbers inaccurate. If the assumptions in the PRD and supporting reports do not hold true in the future, grizzly populations may be adversely impacted. The prudent approach now is to maintain their current listing status. Therefore, I oppose delisting of GYE grizzly bears under management conditions as described in the current FWS PRD and Conservation Strategy. Uncertainties about bear demographics and increasing human activity (including hunting) require a more conservative approach than outlined in the PRD. Established recovery strategies and criteria should be retained or even strengthened, with continuing effort to reduce human activity that either damages habitat or invites the greatest risk of human-bear conflict which leads to bear mortality. The PRD does not demonstrate adequately that the scientific modeling or the underlying assumptions to population statistics are robust and will result in appropriate management measures to ensure the success of the GYE grizzly population. I am distressed that FWS expresses confidence in predicting how many "extra" female and male bears that each year will be available for trophy hunting. Some of these annual predictions are very low numbers (less than 5). It is unfathomable that a natural resource agency would ever declare any number of bears less than 5 as "extra" and appropriate for trophy hunting. Given the uncertainty, there should be no "discretionary" bear mortality within the PCA. Current efforts to recover the population of the GYE bears need to continue. Maintenance or even growth of that population should be the primary goal. Grizzly bear populations are an important part of our nation's shared natural heritage. I urge you to reject delisting.	FWS-R6-ES-2016-0042-5529	

Uncertainties about bear demographics and increasing human activity (including hunting) require a more conservative approach than outlined in the PRD. Established recovery strategies and criteria should be retained or even strengthened, with continuing effort to reduce human activity that either damages habitat or invites the greatest risk of human-bear conflict which leads to bear mortality. The PRD does not demonstrate adequately that the scientific modeling or the underlying assumptions to population statistics are robust and will result in appropriate management measures to ensure the success of the GYE grizzly population. I am distressed that FWS expresses confidence in predicting how many "extra" female and male bears that each year will available for trophy hunting. Some of these annual predictions are very low numbers (less than 5). It is unfathomable that a natural resource agency would ever declare any number of bears less than 5 as "extra" and appropriate for trophy hunting. Given the uncertainty, there should be no "discretionary" bear mortality within the PCA.	Factor A	Cynthia Guerra, May 2016 Comments regarding FWS Docket ID: FWS-R6-ES-2016-0042: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife It has been suggested that current management actions have led to an increase in numbers of grizzly bears in the Greater Yellowstone Ecosystem (GYE). But the published Proposed Rule Document (PRD) and supporting reports state that grizzly bears remain "a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality." Therefore, continuation of current management practices is required to help assure a healthy population of the species in the future It is stated that bear numbers have increased in the core recovery area, but the underlying assumptions to these statements may be inherently flawed rendering these numbers inaccurate. If the assumptions in the PRD and supporting reports do not hold true in the future, grizzly populations may be adversely impacted. The prudent approach now is to maintain their current listing status. Therefore, I oppose delisting of GYE grizzly bears under management conditions as described in the current FWS PRD and Conservation Strategy. Uncertainties about bear demographics and increasing human activity (including hunting) require a more conservative approach than outlined in the PRD. Established recovery strategies and criteria should be retained or even strengthened, with continuing effort to reduce human activity that either damages habitat or invites the greatest risk of human-bear conflict which leads to bear mortality. The PRD does not demonstrate adequately that the scientific modeling or the underlying assumptions to population statistics are robust and will result in appropriate management measures to ensure the success of the GYE grizzly population. I am distressed that FWS expresses confidence in predicting how many "extra" female and male bears that each year will available for trophy hunting. Some of these annual predictions are very low numbers (less than 5). It is unfathomable that a natural resource agency would ever declare any number of bears less than 5 as "extra" and appropriate for trophy hunting. Given the uncertainty, there should be no "discretionary" bear mortality within the PCA. Current efforts to recover the population of the GYE bears need to continue. Maintenance or even growth of that population should be the primary goal. Grizzly bear populations are an important part of our nation's shared natural heritage. I urge you to reject delisting.	FWS-R6-ES-2016-0042-5529	
Some of the key ideas that need to be reviewed include 1)the population count uncertainties,2)the ever-changing climate and the affects on key food sources like white bark pine and army cutworm moths, 3)the decline of westslope and yellowstone cutthroat trout (another key food source) due to the nonnative fish introduced into Yellowstone,4)the future elk population uncertainty as more calves are being consumed by bears to replace other depleted food sources, long term drought and declining snowpack nurturing vegetation and a continued hunting economy outside park borders,5)the conditioned behavior of grizzly bears to humans under protection which will allow their population to drastically decline once the protection is removed.	Factor A	Please reconsider your decision of delisting the GYE grizzly bear. Some of the key ideas that need to be reviewed include 1)the population count uncertainties, 2)the ever-changing climate and the affects on key food sources like white bark pine and army cutworm moths, 3)the decline of westslope and yellowstone cutthroat trout (another key food source) due to the nonnative fish introduced into Yellowstone, 4)the future elk population uncertainty as more calves are being consumed by bears to replace other depleted food sources, long term drought and declining snowpack nurturing vegetation and a continued hunting economy outside park borders, 5)the conditioned behavior of grizzly bears to humans under protection which will allow their population to drastically decline once the protection is removed. A)Prior to the recent proposal of delisting the GYE grizzly, the park officials including bear biologists were unable to put a finite number on the grizzly bears. How could they possibly get a definitive number on an 18 million acre area especially when male bears are able to sustain a 1000 square mile roaming territory? We were always told 'around 300-600' for years and years and about the same for black bears (which populations haven't been studied recently at all). All of a sudden there is a definitive number being thrown out there which coincidentally corresponds with the proposed delisting. More research needs to be done to ensure this number is in fact accurate. As we know grizzly bears have such a slow reproduction rate, that if this proposed removal of protection does in fact crash the population they may or may not be able to recover as they did once before. Especially taking into consideration the habitat loss outside the park, increased development and mining, fracking, road building, all of these may not provide the needed habitat that once helped the bears recover. To make a decision based on these facts is premature. Why the rush to a decision when the facts are gray at the least. B)Yes bears have a very diverse diet and can somewhat adapt to the changing environment, it is known that NO food source can replace the caloric content of the white bark pine who are functionally extinct in some areas and with the current trend of future warming climates at high altitudes, this will most likely not allow the white bark pines to make a comeback. Army cutworm moths (another key food source) may not be a dependable food source either, as pesticides affect them in the fields of Kansas and the upper altitude environments may not be suitable in the future with warming temperatures. C)Elk calves have increasingly been consumed by bears in the early summer months, which while great for the bears does add to the overall uncertainty of this key food source as well. Long term drought and natural wolf predation has brought the population into a range of equilibrium, but with the sustained aggressive hunting economy outside the park, the declining snowpack that may not provide as nurturing of vegetation, and the bears themselves increasing predation, the future of yet another key food source is uncertain. D) The bears of Yellowstone and the GYE have learned cohabitation with humans, and those that have not are not here anymore. They get used to humans, learn to avoid them, or turn them into 'white noise' which allows them to feed in the front country in front of the millions of awed and inspired tourists that come to Yellowstone and the National Forests each year. Once protection is removed, there will be a drastic decline in the population as the bears learn their hard	FWS-R6-ES-2016-0042-5566	

I will not support delisting when FWS has not taken climate change, diminished food supply, and threatened habitat fully into account. Lack of published state plans, a short comment period, and poor public hearing site choices makes me wonder if FWS is bowing to political pressure to push the delisting through for specific interest groups.	Factor A	I am very concerned about the FWS proposal to delist the grizzly bear. I do not feel that FWS has provided adequate information for an educated decision on the delisting. Jackson WY was an obvious location for a public hearing. I am very curious as to why FWS did not allow the citizens located in the middle of grizzly bear country to have a forum for discussion on such an important topic. A 60 day comment period is just too short of a timeframe to gather a comprehensive look at public opinion. By disregarding obvious locations and limiting input time, FWS seems to be trying to skew the decision in their favor. Another issue is the fact that Montana and Idaho have not published their state management plans. Where are they? Is anyone working on them? As a Montana resident it is essential for me to know and understand the plan before I can form an educated opinion on delisting the grizzly. FWS has not taken into account the effects of climate change on the grizzly's food sources and habitat. Grizzlies can adapt to changing food sources and availability, but FWS has failed to provide conclusive research to show that the bears can adapt quickly enough to keep up with the increased rate of change. Specifically, the diminished habitat for the army cutworm moth, threatened cutthroat trout populations, and the decimation of the white bark pine due to blister rust and pine beetles. The research /data that has been presented is insufficient in duration. Before delisting can be considered, comprehensive studies over a longer period of time will need to be carried out. More time will give biologists and the public correct information on food source sustainability. Other data presented by FWS said that bison were not a significant source of food. Research was done in the Yellowstone Lake area where there are few bison, but what about Lamar Valley where bison are plentiful? Once again this data is skewed and insufficient. FWS reasons for delisting lacks plausibility because of the lack of research carried out over a sufficient amount of time and data on too small of a population to be generalized. I will not support delisting when FWS has not taken climate change, diminished food supply, and threatened habitat fully into account. Lack of published state plans, a short comment period, and poor public hearing site choices makes me wonder if FWS is bowing to political pressure to push the delisting through for specific interest groups. The grizzly bears should be allowed to thrive, not just maintain an existence.	FWS-R6-ES-2016-0042-5552	
B)Yes bears have a very diverse diet and can somewhat adapt to the changing environment, it is known that NO food source can replace the caloric content of the white bark pine who are functionally extinct in some areas and with the current trend of future warming climates at high altitudes, this will most likely not allow the white bark pines to make a comeback. Army cutworm moths (another key food source) may not be a dependable food source either, as pesticides affect them in the fields of Kansas and the upper altitude environments may not be suitable in the future with warming temperatures.C)Elk calves have increasingly been consumed by bears in the early summer months, which while great for the bears does add to the overall uncertainty of this key food source as well. Long term drought and natural wolf predation has brought the population into a range of equilibrium, but with the sustained aggressive hunting economy outside the park, the declining snowpack that may not provide as nurturing of vegetation, and the bears themselves increasing predation, the future of yet another key food source is uncertain.	Factor A	Please reconsider your decision of delisting the GYE grizzly bear. Some of the key ideas that need to be reviewed include 1)the population count uncertainties, 2)the ever-changing climate and the affects on key food sources like white bark pine and army cutworm moths, 3)the decline of westslope and yellowstone cutthroat trout (another key food source) due to the nonnative fish introduced into Yellowstone, 4)the future elk population uncertainty as more calves are being consumed by bears to replace other depleted food sources, long term drought and declining snowpack nurturing vegetation and a continued hunting economy outside park borders, 5)the conditioned behavior of grizzly bears to humans under protection which will allow their population to drastically decline once the protection is removed. A)Prior to the recent proposal of delisting the GYE grizzly, the park officials including bear biologists were unable to put a finite number on the grizzly bears. How could they possibly get a definitive number on an 18 million acre area especially when male bears are able to sustain a 1000 square mile roaming territory? We were always told 'around 300-600' for years and years and about the same for black bears (which populations haven't been studied recently at all). All of a sudden there is a definitive number being thrown out there which coincidentally corresponds with the proposed delisting. More research needs to be done to ensure this number is in fact accurate. As we know grizzly bears have such a slow reproduction rate, that if this proposed removal of protection does in fact crash the population they may or may not be able to recover as they did once before. Especially taking into consideration the habitat loss outside the park, increased development and mining, fracking, road building, all of these may not provide the needed habitat that once helped the bears recover. To make a decision based on these facts is premature. Why the rush to a decision when the facts are gray at the least. B)Yes bears have a very diverse diet and can somewhat adapt to the changing environment, it is known that NO food source can replace the caloric content of the white bark pine who are functionally extinct in some areas and with the current trend of future warming climates at high altitudes, this will most likely not allow the white bark pines to make a comeback. Army cutworm moths (another key food source) may not be a dependable food source either, as pesticides affect them in the fields of Kansas and the upper altitude environments may not be suitable in the future with warming temperatures. C)Elk calves have increasingly been consumed by bears in the early summer months, which while great for the bears does add to the overall uncertainty of this key food source as well. Long term drought and natural wolf predation has brought the population into a range of equilibrium, but with the sustained aggressive hunting economy outside the park, the declining snowpack that may not provide as nurturing of vegetation, and the bears themselves increasing predation, the future of yet another key food source is uncertain. D) The bears of Yellowstone and the GYE have learned cohabitation with humans, and those that have not are not here anymore. They get used to humans, learn to avoid them, or turn them into 'white noise' which allows them to feed in the front country in front of the millions of awed and inspired tourists that come to Yellowstone and the National Forests each year. Once protection is removed, there will be a drastic decline in the population as the bears learn their hard	FWS-R6-ES-2016-0042-5566	

If Grizzly Bears were to be removed from the Endangered and Threatened species list - not just the few that would be legally hunted would perish each year on lands surrounding Yellowstone. It would become more easy to fragment the habitat through mining, timber sales, recreation, etc if the land was not inhabited by a species of concern. Humans could "accidentally" shoot a Grizzly bear and call it self defense, without the ramifications of being persecuted which would happen if you shot and killed a species of concern. Humans could be more carefree about shooting guns towards a bear, rather than using pepper spray, which could lead to an increase with injured bears that could become more dangerous to another human that it might encounter next.	Factor A	I am an authorized and licensed guide working inside Yellowstone National Park. I am a resident of Gardiner, Montana which is a gateway community to Yellowstone's Northern Border. As the owner of my guiding service, my income and livelihood rely on the fact that people want to visit the natural beauty that is found inside our world's first national park. Yellowstone is a one-of-a-kind place where wildness still exists in the Lower 48. Bound by public lands and no serious development, allows the wildness to thrive. Without the existing USFS lands (forest and designated wilderness) that surround the park, Yellowstone National Park would not have the diversity within its biological communities that it has today. Gardiner sits in a small valley that is surrounded by public lands. I grew up in the west gaining a respect for the open spaces that I had around me and I am now able to instill that similar respect to my 4 year old daughter today, because of the wildness that surrounds us. We can walk up the hill behind our house and easily find tracks of grizzly and black bears, wolves, coyote, cougar, elk, bison, mule and whitetail deer and the occasional moose. We have all the amazing diversity of creatures, literally out our back door and my daughter can experience this wildness and be in touch with it. In today's society - that is a honest to goodness VERY special thing! If Grizzly Bears were to be removed from the Endangered and Threatened species list - not just the few that would be legally hunted would perish each year on lands surrounding Yellowstone. It would become more easy to fragment the habitat through mining, timber sales, recreation, etc if the land was not inhabited by a species of concern. Humans could "accidentally" shoot a Grizzly bear and call it self defense, without the ramifications of being persecuted which would happen if you shot and killed a species of concern. Humans could be more carefree about shooting guns towards a bear, rather than using pepper spray, which could lead to an increase with injured bears that could become more dangerous to another human that it might encounter next. With today's global changes - drier climate means less available overall forage (not just Whitemark pine nuts) for the Grizzly Bear. This in turn will lead to more seasonal human/bear conflict and more removal of bears from the Greater Yellowstone Ecosystem. All of these reasons stated - leads to the simple fact that Grizzly Bears can not rebound once their habitat is fragmented, human conflict increases and food sources overall, are changing. Even though reaching a larger population of bears in the ecosystem is a sign of success and cause for delisting, we must look at the bigger picture and understand that Grizzly Bears are a scientifically proven species that has a low mortality rate and negatively affected by changes in its habitat. This very serious decision of delisting is coincided with the fact that we are reviewing opening sections of the Gallatin Mountain Range for more motorized access, rather than restricting it. This land in question is the bordering land to Yellowstone National Park's north and a well known travel corridor for Grizzly Bears (not to mention countless other species). Delisting Grizzly Bears is a wrong decision and for the betterment of the world and all the natural spaces left in the Lower 48 - Yellowstone's Ecosystem needs protection that stretches beyond the invisible line of the National Park boundary. For the betterment of our children, wildness must remain wild. Hunting of Grizzly Bears is wrong and unnecessary. Trophy hunting is	FWS-R6-ES-2016-0042-5606	
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This magnificent animal's imperilment comes from too many people collectively causing permanent habitat degradation and fragmentation (such as increasing human infrastructure, energy development, problematic livestock husbandry practices, climate change, poor state management, persecution, and questionable methods of monitoring the grizzly's status).- Yellowstone's grizzly bears have lost critically important forage that previously had positive effects on their reproductive success. Since the early 2000s much of their food resources are depleted due to recently introduced non-native lake trout, a white pine fungal disease, a climate-driven outbreak of bark beetles, and a loss of army cutworm moth that are severely threatened by warming. There is no doubt that food resources of Yellowstone's grizzly bears have declined and put the population at grave risk, and more is on its way.	Factor A	I submit comments as a biologist and wildlife conservationist. Given the severity of threats facing Yellowstone's grizzly bears, I strongly urge you to NOT delist the population, renew sport hunting, and/or lessen habitat protections. The reasons to not delist follow. - Yellowstone's grizzly bear population is NOT recovered: It is completely isolated from other grizzly bear populations and very far from the 2000+ animals considered necessary for long-term viability; it's also only 2% of the 100,000 grizzly bears that once roamed the U.S. (in a range 100 times larger!). This magnificent animal's imperilment comes from too many people collectively causing permanent habitat degradation and fragmentation (such as increasing human infrastructure, energy development, problematic livestock husbandry practices, climate change, poor state management, persecution, and questionable methods of monitoring the grizzly's status). - Yellowstone's grizzly bears have lost critically important forage that previously had positive effects on their reproductive success. Since the early 2000s much of their food resources are depleted due to recently introduced non-native lake trout, a white pine fungal disease, a climate-driven outbreak of bark beetles, and a loss of army cutworm moth that are severely threatened by warming. There is no doubt that food resources of Yellowstone's grizzly bears have declined and put the population at grave risk, and more is on its way. - Grizzly bears have one of the lowest reproductive rates of any land mammal, and most cubs die before adulthood. The species also has difficulty colonizing new habitats, mainly because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates and can more easily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover! - State wildlife management agencies bend over backwards for "sport" hunters interested in killing wildlife, who view carnivores as competitors. Hunting accounts for 70-80% of all deaths of adult carnivores in the West. The public trust doctrine is often invoked by state wildlife agencies, but much abused in actual practice in a system that marginalizes and excludes stakeholders who value large carnivores intrinsically or for contributions to ecosystem health. Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals. - Counting grizzlies in Yellowstone's wilderness is difficult, and the indirect indicators used by USFWS are unreliable and generate false results that increase the likelihood that the USFWS will inaccurately conclude that the population has grown, when, in truth, it has declined due to excessive numbers of deaths. Claims by the USFWS that the Yellowstone grizzly has grown at a high rate for several decades are NOT proven. Although some growth may have occurred, it is likely modest, and population decline is probably occurring NOW as a result of deteriorating habitat conditions. New methods being introduced by the USFWS are billed as an improvement, but will actually increase the risk of over-killing bears and mistakenly conclude that observed levels of death are "sustainable". A bad situation will almost certainly worsen if Yellowstone's grizzlies are delisted and resources are	FWS-R6-ES-2016-0042-5647	
Why can't the USFWS place more resources towards colonization by grizzlies into all suitable habitat within the GYE, primarily working on reducing human-bear conflicts in areas where bears have not existed for the past 50+ years? Again, I would delay delisting until a viable population is established in the Bitterroot- Selway ecosystem in west central Idaho either through natural immigration or translocation.	Factor A	I oppose the delisting of <i>Ursus arctos horribilis</i> in the GYE ecosystem by the USFWS for some of the following reasons: 1. Politics vs Science It appears as though current grizzly bear population estimates in the GYE are made with political expediency in mind. For example, Idaho Fish and Game claim the GYE grizzly population exceeds 1,000 bears while the USFWS claims about 760 bears currently reside in the GYE. This amounts to a 24% disparity between agencies. This, of course, does not meet scientific scrutiny. 2. I would like to see cross scientific methods used to establish the current population in the GYE in order to improve the accuracy of the count. Use a DNA rub study in conjunction with radio collaring, field observation and spatial habitat modeling and analysis as was done in the NCDE recently. I know that there were overtures made to the IGBST to conduct a DNA rub analysis in the GYE a few years back which was meant with vehement resistance. 3. Historically, the states of Wyoming, Montana and especially Idaho have done a very poor job in protecting this iconic species. Before the ESA was enacted and implemented in 1974, the grizzly bear population in the GYE was under 200 and certainly headed towards extirpation without the timely intervention and sound recovery plan of the USFWS. If delisting occurs, what's to prevent the states involved from botching the current success achieved by the federal agency. 4. Knowing that the grizzly has one of the lowest reproductive rates and a cub of the year mortality rate of 50%, there is very little room for error. 5. Why can't the USFWS place more resources towards colonization by grizzlies into all suitable habitat within the GYE, primarily working on reducing human-bear conflicts in areas where bears have not existed for the past 50+ years? Again, I would delay delisting until a viable population is established in the Bitterroot- Selway ecosystem in west central Idaho either through natural immigration or translocation.	FWS-R6-ES-2016-0042-5574	
Whitebark pine is declining significantly and that is a major food source. To compensate bears are having to turn to other food sources including hunting more game. That increases their chances for injury as well as more human-bear conflict. Less youngsters are surviving the last several years as well. When you consider how slowly a female bear of cub-bearing age is replaced losing even a single bear can have big consequences. Opening up the bear to hunting will allow for that to happen quickly and it may be too late to stop a crash in the population by the time it is detected.	Factor A	Please, keep the grizzly bears on the endangered list. The population has leveled off in recent years and I do not believe it is simply as a response to the available land reaching capacity. Whitebark pine is declining significantly and that is a major food source. To compensate bears are having to turn to other food sources including hunting more game. That increases their chances for injury as well as more human-bear conflict. Less youngsters are surviving the last several years as well. When you consider how slowly a female bear of cub-bearing age is replaced losing even a single bear can have big consequences. Opening up the bear to hunting will allow for that to happen quickly and it may be too late to stop a crash in the population by the time it is detected. I do not believe the states and federal government have the capacity to monitor hunting and the bear population adequately. This population is cut off from the rest, there is no natural corridor to improve genetic diversity or to support growth. Even from purely economical perspective if we start losing bears the states will lose money from tourists, who come specifically to view those magnificent creatures. Please, re-consider this proposed action and give the bears more time to adapt to the changes in climate and environment.	FWS-R6-ES-2016-0042-0016	

The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies.	Factor A	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	
Many of the most important food sources for Yellowstone grizzlies have suffered catastrophic declines in recent years. The nuts of the whitebark pine tree, for instance have long been regarded as the single most important food source for grizzlies, providing a much needed caloric boost going into hibernation, especially for females with cubs. During years of good whitebark cone production, bears stay in the high country during the fall and are much less likely to come into conflict with people. In the last two decades, the whitebark pine stands in the ecosystem have been decimated by blister rust and a pine beetle epidemic (driven by climate change) which has killed most of the mature whitebark pine trees in the ecosystem. Another important food source, the cutthroat trout of Yellowstone lake and its tributaries, has also experienced massive declines due to predation from non-native lake trout. There are further questions about another important food source, the army cutworm moths, which migrate to the ecosystem's highest mountains during the summer from agricultural lands on the great plains where they are threatened by heavy pesticide use.	Factor A	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	
The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends.	Factor A	The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range This is being considered for the benefit of trophy hunters and is not based on the science above or any consideration for the safety of the grizzly population. I implore you to consider not hunting them because of the reasons listed above and many more.	FWS-R6-ES-2016-0042-0387	

Unless you proved safe passage for Grizzly Bears in order to reach viable habitat--which includes food sources necessary to their survival, you should not be opening up Grizzly bears to trophy hunting.	Factor A	I am writing in opposition to Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife because sufficient consideration has not been given to the providing of corridors for Grizzly Bears in order for the genetic health of the species. While there has been some mention of importing bears into the GYE for breeding purposes, this is not the correct policy. At present the Grizzly Bear population if the GYE is cut off from traveling for any purpose of finding suitable habitat for breeding from any other population. If a Grizzly bear were to leave either Yellowstone National Park or Grand Teton National Park for any habitat or breeding needs in order to maintain a viable genetic pool they could or would most likely be killed. And you have not taken sufficient information into consideration regarding our changing climate. Unless you proved safe passage for Grizzly Bears in order to reach viable habitat--which includes food sources necessary to their survival, you should not be opening up Grizzly bears to trophy hunting. There has never been proven the necessity for the killing of Grizzly bears for sport. Killing to remove a bear from incidents caused by humans will most likely to continue because of human desires to encroach on bear territory. Bears are never the problem. Humans are. Until you provide safe passage for Grizzly bears from one gene pool area to another you should not delist them. More than one agency (as I am almost certain you are aware) has opposed delisting based on science. Unless you wish for so few bears that their population is not viable in YNP or GTNP and the GYE you should refrain from putting the Grizzly bear in the cross hairs of a trophy hunter's rifle. You should be demonstrating that you understand what you will be causing by delisting Grizzly bears. No hunter's life depends on a dead Grizzly bear. Grizzly bears depend now on humans for their lives. No human male or female has proven the need to chop off a head and paws and skin a bear to keep his family warm.	FWS-R6-ES-2016-0042-0381	
Delisting the Greater Yellowstone grizzlies now would be premature. Key issues are: One of the slowest reproductive rates among land mammals, small average litter size, and long interval between litters Changes in the food supply: The whitebark pine forest is already 70-80% gone in the GYA due to non-native fungal disease and climate-driven bark beetle attacks; cutthroats have been all but wiped out by exotic lake trout (a deep-water fish unavailable to bears). Moths, which grizzlies eat by the pound, are subject to climate change and pesticides at lower elevations. This leaves meat-primarily elk-which bears shift to as other food sources disappear. More bears are dying as they increasingly use meat (livestock and hunter-killed carcasses) to replace traditional food sources, and come into more conflict with ranchers and hunters as a result."	Factor A	I am writing in OPPOSITION to the removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from ESA listing. Delisting the Greater Yellowstone grizzlies now would be premature. Key issues are: One of the slowest reproductive rates among land mammals, small average litter size, and long interval between litters Changes in the food supply: The whitebark pine forest is already 70-80% gone in the GYA due to non-native fungal disease and climate-driven bark beetle attacks; cutthroats have been all but wiped out by exotic lake trout (a deep-water fish unavailable to bears). Moths, which grizzlies eat by the pound, are subject to climate change and pesticides at lower elevations. This leaves meat-primarily elk-which bears shift to as other food sources disappear. More bears are dying as they increasingly use meat (livestock and hunter-killed carcasses) to replace traditional food sources, and come into more conflict with ranchers and hunters as a result." Habitat expansion and connectivity obstacles Immediate trophy hunting in all three states (Montana, Idaho, and Wyoming). With an estimated 717 bears-down from some 750 in 2014-conservationists advise a precautionary approach, particularly in light of the 55 conflict-related bear mortalities in the past year (and four orphaned cubs sent to zoos, bringing the loss of bears to 59), and the frighteningly low minimum population number of 600 proposed by the U.S. Fish & Wildlife Service.	FWS-R6-ES-2016-0042-0661	
If the Fish and Wildlife Service allows the killing of 70 bears each year, they could easily kill ALL of the black grizzlies in the Greater Yellowstone Ecosystem, and then some, which is absolutely beyond unbelievable, and I can say as a result I am barely able to function. It's ironic in the extreme that this is the legacy that this administration wants, when I voted democratic, I did so for environmental reasons and feel betrayed, honestly. You are talking about one of the most endangered predators on planet Earth. Grizzlies require very large home ranges, and much of the summer alpine habitat occurs outside the parks boundaries, areas like the rugged Taylor Hilgard mountains wilderness, a necessary stronghold of the grizzly bear.	Factor A	If the Fish and Wildlife Service allows the killing of 70 bears each year, they could easily kill ALL of the black grizzlies in the Greater Yellowstone Ecosystem, and then some, which is absolutely beyond unbelievable, and I can say as a result I am barely able to function. It's ironic in the extreme that this is the legacy that this administration wants, when I voted democratic, I did so for environmental reasons and feel betrayed, honestly. You are talking about one of the most endangered predators on planet Earth. Grizzlies require very large home ranges, and much of the summer alpine habitat occurs outside the parks boundaries, areas like the rugged Taylor Hilgard mountains wilderness, a necessary stronghold of the grizzly bear. If the Fish and Wildlife Service allows the killing of 70 bears each year, they could easily kill ALL of the black grizzlies in the Greater Yellowstone Ecosystem, and then some, which is absolutely beyond unbelievable, and I can say as a result I am barely able to function. It's ironic in the extreme that this is the legacy that this administration wants, when I voted democratic, I did so for environmental reasons and feel betrayed, honestly. You are talking about one of the most endangered predators on planet Earth. Grizzlies require very large home ranges, and much of the summer alpine habitat occurs outside the parks boundaries, areas like the rugged Taylor Hilgard mountains wilderness, a necessary stronghold of the grizzly bear. Grizzly bears can't stay recovered if there are not continued protections throughout the whole grizzly bear recovery area, and the entire Taylor Fork north of the park, if it's not in this grizzly bear recovery area like I believe that it is, needs to be incorporated into the recovery area, and no sport hunting of the bears there, they need a buffer around the core of Yellowstone Park, much of which is a caldera without as many higher peaks with white bark pine, cooler temps, cutworm moths, in general necessary varied habitat. I don't see any reason to alter this status quo that people are accustomed to. Outside of the recovery area, I'm going to surprise you, I think the states should be able to use their judgement, with perhaps expansion of the recovery area north slightly through the Taylor Hilgards, perhaps. I've heard, anecdotally, actually, that some of the best habitat and densest populations of grizzlies anywhere, and there must be a grain of truth to it, is just near the Yellowstone Club, presumably just south, so it wouldn't make sense to jeopardize grizzlies here where they thrive south of this resort. Like I said, outside of the recovery area, I think the states should be able to use their judgement for managing the bears. Within the Grizzly Bear Recovery Area, I think the focus should be not on sport hunting, but more targeted removal of problem bears. Bears have their own unique personalities and dispositions, I'm not talking about bears that are tolerant of people and not threatening. I've had no problems whatsoever from an ear tagged bear with an orange earring, for example. Focus on managing the bears for public safety, which is much more important than randomly shooting them within the recovery area. Make it safer instead of killing the rarest bears on EARTH that cause no problems for anyone!!!!!! Beyond the recovery area, I have to admit, as a person that's had one too many close calls, it's nice to have areas to go hike without worrying, say the Spanish Peaks wilderness. It's not all or nothing. That's the problem with environmentalism these days. Why am I saying this? Because I don't subscribe to the idea that Yellowstone is anything other than an island of habitat. In fact, that's why the bears are unique, they are isolated, and they should remain that way to stay that way. That's why they need a larger habitat than Yellowstone, whose boundaries are mostly designed to encompass thermal features (though they missed a few north of Gardiner, if you ask me, which I think should be included, next to the river, which would have solved the need for low altitude wintering grounds too, perhaps the Church Universal and Triumphant will give it back). Yellowstone needs the mountainous areas just outside its boundaries as a core area of protection for the grizzlies within the recovery area. I can't emphasize that enough. If you look at the	FWS-R6-ES-2016-0042-0609	

There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor.	Factor A	I strongly oppose the delisting of Grizzly Bears on the following grounds: The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. If this was an ungulate population, you would not delist them and turn them over to be hunted at this population level, despite their much faster reproductive rate. Indeed, Alaska is continuing to kill wolves as part of "a long-standing management program aimed at increasing the Fortymile caribou herd." A herd which is currently estimated at over 50,000 caribou! Do not give in to those who would see these important bears as nothing more than a threat to their livestock, or a trophy to be gunned down. Allow science, not political pandering, to be the measuring stick of true recovery.	FWS-R6-ES-2016-0042-0065	
In order to ensure the long term survival of this isolated population and expand its gene pool, protected corridors to other regions need to be established.	Factor A	I OPPOSE the delisting of Grizzly Bears on the following grounds: In order to ensure the long term survival of this isolated population and expand its gene pool, protected corridors to other regions need to be established. The grizzly bear is one of the slowest reproducing mammals on this continent, taking a minimum of 3 years to produce each offspring. There is currently no significant increase in grizzly bear populations, therefore it is premature to reintroduce hunting on them, as it may put them in another serious decline. Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions. There is a decline in the grizzly bear's primary food sources due to climate change, forcing bears to search further for their food. If no federal protections are in place, grizzlies would not be able to reach further vital food sources in Wyoming. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government, as is the case with Gray wolves.	FWS-R6-ES-2016-0042-0360	

Trigger Text	Code(s)	Full Comment Text	Form Letter/Document ID	Annotation Notes
If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts	Factor B	Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities. Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 -- and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears. - - The plan presents a potentially tremendous setback. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - - Yellowstone's bears have also long been isolated from other bear populations, forcing the government to keep them on permanent life support by proposing to truck in bears to avoid health issues caused by inbreeding. This fact further highlights the need for recovering grizzlies in more places. - - I am asking the Service to maintain protections for Yellowstone grizzly bears. If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts - - .I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population.	Factor B	Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities. Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 -- and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears. - - The plan presents a potentially tremendous setback. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - - Yellowstone's bears have also long been isolated from other bear populations, forcing the government to keep them on permanent life support by proposing to truck in bears to avoid health issues caused by inbreeding. This fact further highlights the need for recovering grizzlies in more places. - - I am asking the Service to maintain protections for Yellowstone grizzly bears. If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts - - .I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	

Already too many species are being eradicated so that hunters can kill them & making it easier for ranchers to be careless about their cattle & sheep!	Factor B	Since state don't have regulations in place to manage grizzly bears - why would their protection be taken away? Do hunters truly have THAT much influence? NO MORE TROPHY HUNTS! Already too many species are being eradicated so that hunters can kill them & making it easier for ranchers to be careless about their cattle & sheep! This plan is a setback - do the right thing for these animals!	CBD	
Do hunters truly have THAT much influence?	Factor B	Since state don't have regulations in place to manage grizzly bears - why would their protection be taken away? Do hunters truly have THAT much influence? NO MORE TROPHY HUNTS! Already too many species are being eradicated so that hunters can kill them & making it easier for ranchers to be careless about their cattle & sheep! This plan is a setback - do the right thing for these animals!	CBD	

make it illegal for elk and other hunters to gut their kills in the outlying areas of Yellowstone -- which entices grizzly bears and wolves to the free food	Factor B	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope—they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, make it illegal for elk and other hunters to gut their kills in the outlying areas of Yellowstone -- which entices grizzly bears and wolves to the free food. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in West—they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. It's not like you're stopping anybody from collecting their food, nobody really eats grizzly bears, killing one of these majestic animals is - trophy hunting, shame on us. Thank you. Sincerely,	Endangered Species Coalition	
Secondly, please create a delay in the onset of any grizzly bear hunting for several years, post-delisting, to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Especially there, we should definitely treat them as our neighbors, not merely as game animals.	Factor B	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been an amazing Endangered Species Act success story. However, after reading it today, I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope. They should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears therein. Secondly, please create a delay in the onset of any grizzly bear hunting for several years, post-delisting, to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Especially there, we should definitely treat them as our neighbors, not merely as game animals. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. This should be standard policy in national parks and forests. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in West. I know they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	

There are so few left, we killed most of them and continue to encroach on their habitat. Global warming adds to destruction as well	Factor B	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. There are so few left, we killed most of them and continue to encroach on their habitat. Global warming adds to destruction as well First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€”they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in Westâ€”they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	
The Service needs to declare a hunting moratorium if bears are delisted	Factor B	My comments on the proposed delisting rule. Please put the proposed rule on hold. State grizzly bear management plans are out dated and unfounded. Our nation needs to plan to protect the places where bears live. Habitat has dwindled and needs be protected. The Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming, planning to hunt bears, do not have a sustainable coordinated plan. I oppose grizzly bear hunting. There is no over abundance of bears. Questionably, the challenges for a sustainable may never be overcome due to the current habitat limitations and interactions with humans. Grizzly bears are worth more alive than dead. Especially bear #399 and #610. I would think they would be the first shot since their habits are well know for leaving the park. That would be tragic and possibly trigger more that a government agency would want to, or afford to, deal with. Those bears are beloved by all. Plans need to identify the funding to pay for maintaining a healthy grizzly bear population. - Protect core habitat. - Reduce conflicts and maintain stable numbers of bears. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	

If delisted bears will unnecessarily die. Killing should not be recreation for people-other animals do it to survive but we are the only ones who kill for the entertainment of it. There is no reason to kill bears-it is not they who are overpopulated and like all other beings they have a role in nature. To kill bears is to upset the balance that nature strives to maintain even further. Leave the bears alone I ask of you. The do not deserve to die for the wants of people. we should be learning bout them and living with them instead of murdering them .-	Factor B	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies	GYC	
I am also concerned that there are no buffer zones established around the national parks. This has been a big problem for wolves and bison which stray outside the park boundaries and are then "legally" shot by hunters. Tourists from all over the world visit our western parks specifically to see iconic species, grizzly bears, wolves and bison in their natural habitat; these animals do not recognize artificial borders. Do not be swayed by the vocal hunting and ranching lobby which is motivated by short term goals and profit. Grizzly bears currently inhabit only a tiny fraction of their historic range. Any proposal to delist them from ESA protection is premature. Further, the current proposal is seriously flawed .	Factor B	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. I am also concerned that there are no buffer zones established around the national parks. This has been a big problem for wolves and bison which stray outside the park boundaries and are then "legally" shot by hunters. Tourists from all over the world visit our western parks specifically to see iconic species, grizzly bears, wolves and bison in their natural habitat; these animals do not recognize artificial borders. Do not be swayed by the vocal hunting and ranching lobby which is motivated by short term goals and profit. Grizzly bears currently inhabit only a tiny fraction of their historic range. Any proposal to delist them from ESA protection is premature. Further, the current proposal is seriously flawed. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between	GYC	

While it may appear that the bear is "recovered", this premature effort is mainly politically, not scientifically driven. Already Montana, Wyoming and Idaho are dividing the KILLS like so many children dividing the found candy. Fish and game departments are salivating over the sale of licenses. Where are the connected corridors to insure that this island population can truly survive ?	Factor B	Please accept my comments on the proposed delisting rule. While it may appear that the bear is "recovered", this premature effort is mainly politically, not scientifically driven. Already Montana, Wyoming and Idaho are dividing the KILLS like so many children dividing the found candy. Fish and game departments are salivating over the sale of licenses. Where are the connected corridors to insure that this island population can truly survive? First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies	GYC	
Please accept my comments on the proposed delisting rule. Please do not delist grizzly bears. There certainly should not be hunting allowed, as there are already many deaths per year.	Factor B	Please accept my comments on the proposed delisting rule. Please do not delist grizzly bears. There certainly should not be hunting allowed, as there are already many deaths per year. It is better to wait than to jump into this, since we do not know how climate change will affect them, with wildfire destroying habitat, new diseases, heat stresses on water and impacts yet to be seen and understood. Improving corridors to connect populations, and other habitat protection measures need to be funded and in place. Thanks,	GYC	

If legally possible, I also believe that the Service should require states to ban hunting of grizzlies, at least until we have a far more robust population.	Factor B	I am writing about the proposed delisting of the grizzly bear. I strongly oppose delisting at this time. It is clearly premature to remove the current protections. It seems to me that delisting at present would subject a very small, remnant population of grizzlies to a very high risk of being lost in the face of a collection of not so improbable adverse events. Even if the Service feels compelled to delist at current population levels, it must first ensure that there are ways for dispersed grizzly populations to connect with each other to ensure continuation of a healthy genetic stock. If legally possible, I also believe that the Service should require states to ban hunting of grizzlies, at least until we have a far more robust population.	GYC	
Maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans	Factor B	Please accept my comments on the proposed delisting rule. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. The country's grizzly bears are almost all habituated to humans, with most willing to co-exist and not harm us. They normally do not see people as food or as harmful. Hunting them is taking unfair advantage and needlessly killing creatures that we can live in harmony with. When a bear becomes a danger to people or animals, then it can be removed from the population. Include a campaign to change people's attitudes first. Protect core habitat. There needs to be a corridor from Yellowstone to the Yukon (the Y to Y project). Please support that so that the grizzly population can become self sustaining, with or without people, with or without special protections, as part of a natural ecosystem. They need to be able to travel to find food and other non-related bears. - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. -Maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. Maintaining a stable population will depend on the grizzly's food supply in a human-free habitat, which is in great fluctuation now. Commit to reducing conflicts. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. A campaign and bear-proof garbage containers to start. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other agencies involved. Many volunteers and local groups are ready, willing, and able to help. Please change the proposed plan for the better. Show that we have learned how to manage wildlife better over these past years when we didn't do so well. Take the words 'extermination', 'killing', 'removing', and 'reducing the population' out of your dictionary. It's our country too and many of us love to see grizzly bears.	GYC	

No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans	Factor B	Dear Service Please slow this down and consider the State's Plans Positions first! Those must be "in place" or wanton slaying of these great bears is a real possibility. Then....review this once it is assured that the bears are "safe". I am a hunter but these bears are NOT Trophy animals. They are simply too rare. Too easily hunted and killed. They have lost the fear of the human in too many cases. Given the lack of Funds for all your Work, in general, where will the dollars come from to Monitor and Police the States? Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better. Thanks for reading this.	GYC	
We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen.	Factor B	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	

Grizzlies need very substantial and long term protections from fatal human encounters. Please, please do not transfer management to the states without severe penalties for reducing numbers of Grizzlies below optimal scientific levels. The level the politicians in those states desire most is extermination, and they will say anything to eventually achieve massive reductions in their numbers, as they have with Wolves	Factor B	Please accept my comments on the proposed delisting rule. Grizzlies need very substantial and long term protections from fatal human encounters. Please, please do not transfer management to the states without severe penalties for reducing numbers of Grizzlies below optimal scientific levels. The level the politicians in those states desire most is extermination, and they will say anything to eventually achieve massive reductions in their numbers, as they have with Wolves. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate	GYC	
Please accept my comments on the proposed delisting rule. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. The country's grizzly bears are almost all habituated to humans, with most willing to co-exist and not harm us. They normally do not see people as food or as harmful. Hunting them is taking unfair advantage and needlessly killing creatures that we can live in harmony with. When a bear becomes a danger to people or animals, then it can be removed from the population.	Factor B	Please accept my comments on the proposed delisting rule. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. The country's grizzly bears are almost all habituated to humans, with most willing to co-exist and not harm us. They normally do not see people as food or as harmful. Hunting them is taking unfair advantage and needlessly killing creatures that we can live in harmony with. When a bear becomes a danger to people or animals, then it can be removed from the population. Include a campaign to change people's attitudes first. Protect core habitat. There needs to be a corridor from Yellowstone to the Yukon (the Y to Y project). Please support that so that the grizzly population can become self sustaining, with or without people, with or without special protections, as part of a natural ecosystem. They need to be able to travel to find food and other non-related bears. - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. -Maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. Maintaining a stable population will depend on the grizzly's food supply in a human-free habitat, which is in great fluctuation now. Commit to reducing conflicts. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. A campaign and bear-proof garbage containers to start. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other agencies involved. Many volunteers and local groups are ready, willing, and able to help. Please change the proposed plan for the better. Show that we have learned how to manage wildlife better over these past years when we didn't do so well. Take the words 'extermination', 'killing', 'removing', and 'reducing the population' out of your dictionary. It's our country too and many of us love to see grizzly bears.	GYC	

Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species.	Factor B	I am writing to ask that you do not delist Yellowstone grizzly bears. Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered. Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society	
The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them.	Factor B	I am writing to ask that you do not delist Yellowstone grizzly bears. Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered. Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society	

Trophy hunting is not justifiable as a conservation tactic and has no place in science based wildlife management and protection .	Factor B	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. How is it possible that there is even a serious discussion of removing federal protection? If that happens, the outcome is known in advance. Trophy hunting is not justifiable as a conservation tactic and has no place in science based wildlife management and protection.	Humane Society Petition	
There are laws in place to handle bears that interfere with ranchers. There is no need, nor are there enough bears, to permit the lifting of their protection.	Factor B	I care! There are laws in place to handle bears that interfere with ranchers. There is no need, nor are there enough bears, to permit the lifting of their protection. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	

The tourist industry in the Teton-Yellowstone area reaps far more benefits from viewing and photographing these great creatures than from the hunters who would only buy a hunting license kill an innocent bear and leave .	Factor B	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. The tourist industry in the Teton-Yellowstone area reaps far more benefits from viewing and photographing these great creatures than from the hunters who would only buy a hunting license kill an innocent bear and leave.	Humane Society Petition	
Why delisting must now mean these animals must die is appalling. We don't hunt eagles! We should not hunt grizzly bears. They are worth more than mounts and hides. I am sickened by hunting for this purpose .	Factor B	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. Why delisting must now mean these animals must die is appalling. We don't hunt eagles! We should not hunt grizzly bears. They are worth more than mounts and hides. I am sickened by hunting for this purpose. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	

Human encroachment is devastating on all wild species. I urge you to act so that future generations will be able to appreciate this majestic creature -- not just trophy hunters .	Factor B	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. We need to see more progress in the recovery of bear populations, and it may be that the protections can never be removed. Human encroachment is devastating on all wild species. I urge you to act so that future generations will be able to appreciate this majestic creature-- not just trophy hunters.	Humane Society Petition	
If it was your goal to increase the grizzly bear population to allow insecure people to feel better about themselves by killing, then please do not waste our tax dollars on repopulating them again. Let them just naturally die out due to human behavior.	Factor B	The federal government spent years and money trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. If it was your goal to increase the grizzly bear population to allow insecure people to feel better about themselves by killing, then please do not waste our tax dollars on repopulating them again. Let them just naturally die out due to human behavior. If trophy hunting was not your goal, then a range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	

Trophy hunters will come to have a green light to start killing them as well if they leave the park. Baiting a bear is easy as they can smell food over 5 miles away. The hunters in this area love to kill anything that moves. Protected bears have been shot by residents for getting into bird feeders. It will be a free-for-all by people who are afraid of them once they have no protection. Human caused death is already their number one cause for dying.	Factor B	Idaho, Montana & Wyoming have a pronounced history of killing animals for special interests like killing Yellowstone Bison that leave the park for the Cattleman's Association to prevent brucellosis of which we know transmission to cattle is rare. Aerial killing of wolves for the same reason is also prevalent as two examples. Trophy hunters will come to have a green light to start killing them as well if they leave the park. Baiting a bear is easy as they can smell food over 5 miles away. The hunters in this area love to kill anything that moves. Protected bears have been shot by residents for getting into bird feeders. It will be a free-for-all by people who are afraid of them once they have no protection. Human caused death is already their number one cause for dying. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	
Does the local economy REALLY need the income from trophy hunting, or are their more viable long term options that would sustain the bear population AND provide income ?	Factor B	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Does the local economy REALLY need the income from trophy hunting, or are their more viable long term options that would sustain the bear population AND provide income? Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	

Grizzly bears in America are nowhere near overpopulation and pose no unreasonable threat to humans. There is no humane excuse or safety reason to allow senseless killing of these animals for sport or profit.	Factor B	Grizzly bears in America are nowhere near overpopulation and pose no unreasonable threat to humans. There is no humane excuse or safety reason to allow senseless killing of these animals for sport or profit. The grizzly bear population is far from recovered and we need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	
Please do not remove federal protections from grizzly bears in the GYE area. Hunters have all the room they need already. Save these bears for everyone else who cares about total life on this planet .	Factor B	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. Hunters have all the room they need already. Save these bears for everyone else who cares about total life on this planet.	Humane Society Petition	

I live in North Carolina, next to the Great Smokey Mountains Natl Park I am so fortunate to live with our black bears. there are always political pressures from trophy hunters to ease the restrictions on hunting our bear and elk population. The U.S. Fish and Wildlife Service seems willing to lift restrictions. Perhaps they feel their jobs are threatened if the pressures are great enough.... Please protect the Grizzlies in the Greater Yellowstone Ecosystem from these pressures. These animals are not yet numerous enough t begin hunting to reduce their populations	Factor B	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. I live in North Carolina, next to the Great Smokey Mountains Natl Park I am so fortunate to live with our black bears. there are always political pressures from trophy hunters to ease the restrictions on hunting our bear and elk population. The U.S. Fish and Wildlife Service seems willing to lift restrictions. Perhaps they feel their jobs are threatened if the pressures are great enough.... Please protect the Grizzlies in the Greater Yellowstone Ecosystem from these pressures. These animals are not yet numerous enough t begin hunting to reduce their populations....	Humane Society Petition	
We need to continue to increase the bear population, not allow their numbers to drop for sport, especially in the GYW area.	Factor B	We need to continue to increase the bear population, not allow their numbers to drop for sport, especially in the GYW area. Scientists tell us that keeping these grizzly bears on the list is the correct course of action, exactly because their population is nowhere near their pre-settlement population in the lower 48 states.	Humane Society Petition	

They need PROTECTION, Not annihilation... Trophy hunters have NO respect for nature . They and their guns and traps should be PERMANENTLY banned from entering National Parks if their only reason to visit is to kill or maim;;;, to claim a special "trophy"and pretend to be a hero....Our National Parks should NEVER condone this "sport". NEVER,NEVER...	Factor B	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections. Grizzly bears are also part of the wonderful fascination and wildlife that attract so many people to Yellowstone. With other members of this very special wildlife "community," like wolves, they are essential to balance nature and the eco system..They need PROTECTION, Not annihilation... Trophy hunters have NO respect for nature . They and their guns and traps should be PERMANENTLY banned from entering National Parks if their only reason to visit is to kill or maim;;;, to claim a special "trophy"and pretend to be a hero....Our National Parks should NEVER condone this "sport". NEVER,NEVER...	Humane Society Petition	
It is NOT a place for "hunters" in any shape or form	Factor B	Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Yellowstone is probably the most phenomenal place I have ever visited. The wildlife is incredible! It is truly a balance of nature in a protected environment. It is NOT a place for "hunters" in any shape or form. The ONLY item that should be allowed for hunting is a camera! Please protect this wonderful place and its inhabitants in any way you can. Thanks again for considering my comments.	NPCA	

am extremely concerned that the Fish and Wildlife Service's proposal could allow hunting to occur inside Grand Teton and the John D. Rockefeller Parkway, adjacent to national park lands, and in key ecological corridors.	Factor B	The chance to glimpse grizzly bears in wild and protected habitat is one of the many reasons that millions of visitors travel to Grand Teton and Yellowstone National Parks each year. Now, these iconic animals need USFWS help to ensure their conservation in the parks and the surrounding Greater Yellowstone Ecosystem remains a success story! The U.S. Fish and Wildlife Service recently proposed removing Greater Yellowstone Ecosystem grizzly bears from the Endangered Species List. Its proposal is incomplete and will not ensure the long-term conservation of the iconic Yellowstone grizzly. We need a better plan--the bears' future depends on it. I am extremely concerned that the Fish and Wildlife Service's proposal could allow hunting to occur inside Grand Teton and the John D. Rockefeller Parkway, adjacent to national park lands, and in key ecological corridors. In its current form, the Fish and Wildlife Service proposal could reduce safeguards for the bears that call Yellowstone and Grand Teton home. Several decades and millions of dollars have been dedicated to recovering the grizzly bears of Yellowstone, Grand Teton, and surrounding landscapes to ensure the long-term health of these animals. It would be a disservice to park grizzly bears, the efforts of countless individuals, and generations to come to rush a decision of this magnitude without fully addressing the concerns of agency wildlife managers and the public. I am asking the U.S. Fish and Wildlife Service to write a better plan to ensure a healthy future for the grizzlies of the Greater Yellowstone Ecosystem. Please, FWS, choose to take action to better protect Greater Yellowstone's grizzly bears. Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species	NPCA	
Ensure that significant buffer zones outside of the Park are provided with NO HUNTING or CULLING permitted; infractions of which have serious penalties attached .	Factor B	Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule. Surrounding Yellowstone are three states that have great difficulty regarding migratory habits and needs of protected wildlife. Thus I am asking that you take the following steps before finalizing it: Ensure that significant buffer zones outside of the Park are provided with NO HUNTING or CULLING permitted; infractions of which have serious penalties attached. * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Thanks again for considering my comments.	NPCA	

We have to STOP giving in to a violent few that would kill, for no other reason than to have a the head of an intelligent and beautiful being on their wall or to have a disturbingly sick picture taken with their so-called conquest! We cannot back down in protecting our planet and its co-inhabitants and I implore you to stand with the compassionate majority and be a voice for the innocent and voiceless.	Factor B	Thank you for the opportunity to comment today regarding the proposed delisting of the Yellowstone Grizzly Bears. This matter is very near and dear to my heart as I am a nature lover and extremely concerned member of the public regarding our wildlife and environment. I think we all know that this misguided move will only turn out to be an open season on the bears! Much to the delight of the "trophy hunters"! An enlightened species we have sadly, not yet become..... I have always wanted to visit the area but would not be able to in good conscience if this is allowed to happen. And I am sure this will cost a great deal in other tourist opportunities as well! It breaks my heart that so many have worked for so long to protect the innocent animals that we should be caring for and sharing this planet with when it seems like with the stroke of a pen it can all be undone! Have we brought so many amazing species back from the brink just to obliterate them once again???? I certainly hope not! We have to STOP giving in to a violent few that would kill, for no other reason than to have a the head of an intelligent and beautiful being on their wall or to have a disturbingly sick picture taken with their so-called conquest! We cannot back down in protecting our planet and its co-inhabitants and I implore you to stand with the compassionate majority and be a voice for the innocent and voiceless.	NPCA	
State control of predators has proven to be excessively draconian, turning the tiny remnant predator populations of predators not ESA listed into persecuted and very like nonviable over the long-term, unless permanent bans on public hunting can be established.	Factor B	Greater Yellowstone Ecosystem Grizzlies remain isolated from the main population, and delisting with its consequent state public hunting will so further diminish the genetic diversity of that population, that the delisting will effectively slowly extinguish the species. The grizzly still only occupies a very tiny percentage of its historical habitat. Until sufficient subpopulation connectivity is established, and grizzly can naturally disperse into the western US, no delisting is appropriate. State control of predators has proven to be excessively draconian, turning the tiny remnant predator populations of predators not ESA listed into persecuted and very like nonviable over the long-term, unless permanent bans on public hunting can be established. The grizzly has such a slow reproductive capacity, that this small and fragmented US population MUST remain protected for the foreseeable future, as the few states holding populations cannot be trusted to use science to understand the consequences of their already publicized intents to create a public market for the killing of these important apex predators and scavengers.	WELC	

Grizzlies are an iconic symbol of our country and are beloved by millions of wildlife enthusiasts in this country and abroad. Many Grizzlies in the Greater Yellowstone area have become household names and have been immortalized by several renowned international photographers. They are NOT TROPHIES!!!	Factor B	Grizzlies are an iconic symbol of our country and are beloved by millions of wildlife enthusiasts in this country and abroad. Many Grizzlies in the Greater Yellowstone area have become household names and have been immortalized by several renowned international photographers. They are NOT TROPHIES!!! They deserve the protections of the Endangered Species Act or they will be wiped out by ruthless trophy hunters just as Cecil the Lion.	WELC	
If their numbers get too low they may never recover. If they are delisted, don't hunt them. If they are hunted, there should be a no hunting corridor between and around the parks. Do NOT delist the grizzlies!	Factor B	Grizzlies have the lowest reproduction rate of any North American mammal. They need to reach other grizzly populations for biological diversity. Their food sources are being impacted by global warming. If their numbers get too low they may never recover. If they are delisted, don't hunt them. If they are hunted, there should be a no hunting corridor between and around the parks. Do NOT delist the grizzlies!	WELC	

Grizzly bear populations are too small and too genetically limited to be viable without continued protection. If bears are removed from ESA, the three states around Yellowstone will allow hunting and killing of too many bears.	Factor B	Grizzly bear populations are too small and too genetically limited to be viable without continued protection. If bears are removed from ESA, the three states around Yellowstone will allow hunting and killing of too many bears.	WELC	
Are the Parks so desperate for money that they'll let the hunters kill these icons of the wild West? The bears are losing more of their territory every day. Let's give them a break and don't let the hunters shoot them.	Factor B	Grizzly bears are part of our heritage. We have bunches of movies about Mama Bear and her 2 or 3 adorable cubs. Books for kids tell about The 3 Bears. They have been "endangered species" for forty years...and are just now nearly up to desired numbers. So is it the smart thing to do...let the hunters have a field day and take the numbers back to where they have been for 40 years..endangered?! Sounds like a little stupid to me. Is there some reason for this? Other than money for licenses? Winning ranchers' approval? What's the rush? It's an amazing thrill to be driving your grandchildren to Yellowstone and have one of them see a real live grizzly bear..and then two little cubs frolicking behind her! Are the Parks so desperate for money that they'll let the hunters kill these icons of the wild West? The bears are losing more of their territory every day. Let's give them a break and don't let the hunters shoot them. Keep the grizzlies protected.	WELC	

Trophy hunting of large carnivores is unbecoming of us as a people.	Factor B	I want grizzlies to remain a part of our fauna as long as possible. Trophy hunting of large carnivores is unbecoming of us as a people.	WELC	
I STRONGLY OPPOSE the desire of the state wildlife agencies to turn these magnificent bears into trophy heads for some hunters.KEEP THE GRIZZ LISTED !!!	Factor B	It's premature to consider delisting the Yellowstone grizz. Please do NOT remove the protection they have under the ESA. I STRONGLY OPPOSE the desire of the state wildlife agencies to turn these magnificent bears into trophy heads for some hunters. KEEP THE GRIZZ LISTED !!!	WELC	

Just the wolves, you can't strip the federal protections from the Grizzly Bears. This will put their health, population, and survive in greater danger. Also, this will make them more vulnerable to hunting, trapping and killing once again. We can't give up on them like the wolves. Please do the right thing and keep these Grizzly Bears protected. This is very important and serious.	Factor B	Urgent! You're making a big mistake. Why are you doing an unnecessary thing like this? Don't you realize that you are putting another species at risk? Just the wolves, you can't strip the federal protections from the Grizzly Bears. This will put their health, population, and survive in greater danger. Also, this will make them more vulnerable to hunting, trapping and killing once again. We can't give up on them like the wolves. Please do the right thing and keep these Grizzly Bears protected. This is very important and serious.	WELC	
If delisted, grizzlies in Montana, Idaho, and Wyoming would face being hunted and killed for the first time in 40 years. Grizzlies are iconic wildlife in the American West critical to the health of the West's ecosystems. Their population has not fully recovered; and so long as the animals' survival is threatened, all grizzlies require continued Endangered Species Act protection.	Factor B	We oppose your proposal to strip grizzly bears in the Greater Yellowstone Ecosystem of their Endangered Species Act protection. If delisted, grizzlies in Montana, Idaho, and Wyoming would face being hunted and killed for the first time in 40 years. Grizzlies are iconic wildlife in the American West critical to the health of the West's ecosystems. Their population has not fully recovered; and so long as the animals' survival is threatened, all grizzlies require continued Endangered Species Act protection.	WELC	

Do not allow Grizzlies to be hunted again. Why would consider going backward. Enough killing of wild animals. They will surely become extinct if there is no protection. Too many human beings enjoy killing animals. That is still murder, don't you understand?!?!	Factor B	Do not allow Grizzlies to be hunted again. Why would consider going backward. Enough killing of wild animals. They will surely become extinct if there is no protection. Too many human beings enjoy killing animals. That is still murder, don't you understand?!?!	WELC	
Change the rules to even better protect them. Unfortunately our society is full of those that will kill anything that they want for trophies and bragging rights, photos are not good enough. The USFWS does not have the manpower to control the outcome of delisting. As the populations increase to levels not sustainably have a very expensive raffel, to support the USFWS and let those that need a trophie help support your efforts.	Factor B	Don't do it!! Change the rules to even better protect them. Unfortunately our society is full of those that will kill anything that they want for trophies and bragging rights, photos are not good enough. The USFWS does not have the manpower to control the outcome of delisting. As the populations increase to levels not sustainably have a very expensive raffel, to support the USFWS and let those that need a trophie help support your efforts.	WELC	

Threats of hunting cannot be understated and illegal killings are likely to increase as well.	Factor B	I believe that grizzly bear populations are still too low to remove them from the ESA. Threats of hunting cannot be understated and illegal killings are likely to increase as well. I do not believe the genetic diversity of existing populations can be preserved without the ESA. I believe that delisting will put the long term viability of this species at grave risk. Considering the rash of proposed ESA delistings in the last few years that have been based on flawed and weak claims not justified by the scientific record, I am extremely skeptical that delisting the grizzly is justified.	WELC	
Human behaviour is already responsible for significant Grizzly Bear mortality-----either directly via illegal hunting or via traffic deaths or indirectly due to their ever shrinking habitat.	Factor B	Please do not support the proposal to delist the Grizzly Bear. Human behaviour is already responsible for significant Grizzly Bear mortality-----either directly via illegal hunting or via traffic deaths or indirectly due to their ever shrinking habitat. Please keep in mind if it is money that is driving this decision, that these iconic animals of our West are worth far more alive ----with specific regard to the tourist industry.	WELC	

I also OPPOSE Sportsmens Heritage and Recreational Enhancement" (SHARE) Act of 2015 has provisions that may allow the 'management' of grizzlies, by shooting them in their dens during hibernation.	Factor B	I also OPPOSE Sportsmens Heritage and Recreational Enhancement" (SHARE) Act of 2015 has provisions that may allow the 'management' of grizzlies, by shooting them in their dens during hibernation.	FWS-R6-ES-2016-0042-0036	
I am very excited to see that FWS is making a move on delisting Grizzlies. As an avid sportsman, I would love the opportunity to harvest a Grizzly in the lower 48. Grizzlies have made a fantastic recovery and its time for them to be removed from the endangered species list.	Factor B	I am very excited to see that FWS is making a move on delisting Grizzlies. As an avid sportsman, I would love the opportunity to harvest a Grizzly in the lower 48. Grizzlies have made a fantastic recovery and its time for them to be removed from the endangered species list.	FWS-R6-ES-2016-0042-0097	

Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish	Factor B	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose.	FWS-R6-ES-2016-0042-0320	
Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. A	Factor B	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose.	FWS-R6-ES-2016-0042-0320	

Because sport trophy hunting of grizzly bears would be abhorrent and would reverse recovery. Because tolerant bears that people see around the parks would be the first killed.	Factor B	We have lived, worked and recreated in the Greater Yellowstone Ecosystem (GYE) for almost 40 years, meeting working in Yel lowstone National Park. We have explored by foot thousands of miles of trails into some of the most breathtaking landscapes on earth, filled with the suite of native wildlife that we so love and respect. We have seen many grizzly bears over the decades and no animal is more powerful in the public's sensibility than the Great Bear. It is our state animal, picked by Montana school children. Our native tribes greatly value the grizzly bear as do all of us who value our wild places and wildlife. The grizzly bear is greater than life; it represents all that we as a people almost lost and what we have preserved. We value our large predators, our carnivores, because they remind us that we share life together in this time and place. They represent the wilderness we almost lost. We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best: Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data. Because the ecosystem is becoming stressed by climate change causing dramatic changes in food supplies needed. Because all foods are not equal. Because grizzlies are being killed at a rate the slowly-reproducing animals cannot tolerate long-term; since 2002 the population has probably declined Because connectivity with other bears depends upon GYE grizzlies roaming and hunting would preclude that. Because human caused mortality is mostly avoidable and prevention is not stressed enough. Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable. Because sport trophy hunting of grizzly bears would be abhorrent and would reverse recovery. Because tolerant bears that people see around the parks would be the first killed. Because wildlife watchers are ignored by state wildlife agencies and the USFWS. Just look at wolf and bison management. Because tribal interests are ignored by state wildlife agencies. Because wildlife watching brings in far more economically than does hunting in GYE states. Because listing the grizzly as a distinct population segment (DPS) is possibly illegal, because it precludes the bears seeking connectivity. Because the GYE grizzly bear lives on an ecological island. Because politics trumps science every time. We love our grizzly bears and want them protected from nefarious forces bent upon hunting them. USFWS should listen to the public's concerns, listen to opposing scientists and do the right thing. Do not delist the grizzly bear.	FWS-R6-ES-2016-0042-0422	
I am not for completely getting rid of them, but I feel the population has grown out of control and it has gotten to the point where they are expanding in areas they don't need to be.	Factor B	I am in support of DE-LISTING the Grizzly Bear. Although I am not a resident of Wyoming I spend time there and I believe their is too many Grizzly Bears than their needs to be. I am not for completely getting rid of them, but I feel the population has grown out of control and it has gotten to the point where they are expanding in areas they don't need to be. I also feel their fear of humans is not where should be because they haven't been hunted in such a long time that it gets them into trouble because of lack of fear. I strongly support conservation and want to see the elk, moose and deer herds thrive in the great state of Wyoing that I love enjoying so much. Please consider de listing the Grizzly Bear. Thank you for your consideration.	FWS-R6-ES-2016-0042-5033	This person thinks that population growth has accelerated beyond control.

If hunting is not opened then the state will have to eventually eradicate the bears anyways. This has happened in other states where bear hunting was stopped. At least with hunting some revenue for the park and future wildlife management will be made.	Factor B	To those opposed. If hunting is not opened then the state will have to eventually eradicate the bears anyways. This has happened in other states where bear hunting was stopped. At least with hunting some revenue for the park and future wildlife management will be made.	FWS-R6-ES-2016-0042-0496	
In comparison to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of aggressive state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations.	Factor B	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of	FWS-R6-ES-2016-0042-0463	

The government's claim that the population can withstand high mortality for three consecutive years is ludicrous. At 100 dead bears per year, nearly half the current estimated adult population would be killed before any action is contemplated. How can this be acceptable?	Factor B	Removing grizzly bears in the Greater Yellowstone Ecosystem from the protection of the Endangered Species Act at this time would be a enormous mistake. Threats to the species are increasing, not decreasing. Increasing numbers of people are living in and visiting the GYE, and some are pursuing more radically disruptive activities. Scientists and managers are just starting to get a handle on climate change and what it will mean for this area and wildlife. Fish & Wildlife Service's opinion that climate change is no problem for grizzly bears is just not credible. There is much uncertainty about the future of important grizzly bear foods. As a pilot, flying professionally and recreationally in the GYE since the late 1980s, I have witnessed the rapid death of huge swaths of forests in the mountains, including most of the old whitebark pine stands that produced most of the pine seeds. The loss of this important bear food will take a long time to manifest itself fully or even to be understood, particularly if the other most important foods are reduced by climate change or other factors. Elk numbers could decline sharply if chronic wasting disease becomes established. Cutthroat trout, even if recovering slowly in the Yellowstone Lake area, face a bleak future as spawning streams decline due to drought effects. Moth sites in the high mountains could also diminish, and they are highly vulnerable to human disturbance. The science claimed by the government to support delisting has considerable, undisclosed uncertainty. From 1988 to 1997, I was the pilot of many official grizzly bear observation flights in the GYE, working out of Driggs, Idaho with Western Air Research. Observers I flew with varied a lot in their ability to see bears, and in their tolerance for the kind of flying best applied to finding bears. How many bears we saw during a flight seemed to have as much or more to do with the day's conditions, the observer's characteristics, and luck than anything else. Some bears ran for cover immediately, making it hard to know how many cubs a female had with her. Success was high in open areas, so we spent more time flying in those areas. It was hard to know if we saw individual bears more than once on any given flight. Lighting conditions change continually with aircraft direction and clouds, etc., so a bear that looked dark could look light, adding to the problem of distinguishing animals. Having experienced these issues, I find it hard to accept that the government knows accurately how many bears there are, based on the number of observed bears. Statistics can handle some problems, but large variations in observations cannot be avoided. This makes for very poor confidence margins. The idea that the government will know when the number declines to "500 bears" or "612 bears" is a fable. It is clear that the state game agencies want to implement grizzly bear trophy hunting as soon as they can. ~~The killing of bears for sport and pleasure is not acceptable to me, and I believe that is true~~	FWS-R6-ES-2016-0042-5038	
While the Grizzly Bear is an icon of the Yellowstone Eco System I suggest these observations: 1. Yellowstone Park is overpopulated with people.2. The concentration of people on the limited road access has driven these icons further away from mass crowds gawking at wildlife.3. The number of bears outside of the park has reached a potential crisis point. 4. Every predator (defined as an animal that will kill anything to be fed) needs a predator. The sad truth is the human is the only predator of the Grizzly. It is our responsibility that these bears are controlled. This does not mean that they should never kill a domesticated animal but they should be regulated.	Factor B	While the Grizzly Bear is an icon of the Yellowstone Eco System I suggest these observations: 1. Yellowstone Park is overpopulated with people. 2. The concentration of people on the limited road access has driven these icons further away from mass crowds gawking at wildlife. 3. The number of bears outside of the park has reached a potential crisis point. 4. Every predator (defined as an animal that will kill anything to be fed) needs a predator. The sad truth is the human is the only predator of the Grizzly. It is our responsibility that these bears are controlled. This does not mean that they should never kill a domesticated animal but they should be regulated. 5. It would seem that Yellowstone Park must have wildlife to support the financial aspect of how this park is maintained. If the Bear population were to continue to grow unchecked it will become inevitable that bears will kill other Grizzly Bears, black bears, and anything else that is a food resource. Does it serve the bear to allow bears to fight each other for sustenance? My suggestion is to evaluate how the Park manages the tourists. They are the top of the food chain. Then create new zones for tourists within the Park. After all it was created "for the people" and today it is managed not for the people. Millions come in the summers and it is highly unlikely they will see a Grizzly Bear, let alone any wildlife other than Buffalo which are about the same as Angus cows grazing Paradise Valley. It is really disappointing to see how poorly Yellowstone Park is managed. It is embarrassing to see how the visitors who come to interact with wildlife are directed to a highway and accommodated with shabby campgrounds, and poor housing. It has become a theme park without a theme.	FWS-R6-ES-2016-0042-5131	

With forest fires a new threat in many areas, hunting and/or poaching, and natural factors can threaten the species right back onto the endangered list.	Factor B	We need to take the presence of these animals more seriously. With forest fires a new threat in many areas, hunting and/or poaching, and natural factors can threaten the species right back onto the endangered list. We don't need to bow to the pressures of trophy hunters; establish a steady population that doesn't become stuck with a single genetic strain before we go forward with any consideration of delisting.	FWS-R6-ES-2016-0042-5134	
3) Bear distribution. Scientists and concerned citizens have always maintained that in order to ensure a strong and stable population there must be a genetic connectivity to other grizzly populations in the Northern Rockies. I am concerned that pressure from hunting and other human-bear conflict will continue to isolate the Greater Yellowstone population.	Factor B	I am writing to say I do not support the USFWS plan to delist the grizzly bear. Grizzly bear recovery has been a slowly successful, long-term process for the Interagency Grizzly Bear Study Team; they should be proud of their efforts. But I don't believe there is scientific consensus that the species is beyond the need for protection. And I don't believe there is agreement among all interests that the grizzly population is stable enough to withstand hunting. The USFWS states in a their press release from March 3, 2016 that delisting does not solely rely on numbers but also includes "the quantity and quality of habitat, adequate regulatory mechanisms to maintain a healthy and viable population, and a good balance of male and female bears that are well-distributed throughout the ecosystem." I believe all of these factors are unresolved and continue to place the grizzly bear at risk. 1) Quantity/quality of habitat. Climate change and development pressure continue to impact grizzly bear food sources and habitat. Traditional food sources (whitebark pine, cutworm moths, cutthroat trout) are threatened by climate change and invasive species. Development continues to fragment the edges and connectivity of core grizzly bear range. Management needs to aggressively protect habitat including limiting development and road densities in core areas. USFWS needs to work with states and other land management agencies to ensure long-term habitat protection. 2) Regulatory mechanisms. There are not adequate regulatory mechanisms in place to guarantee grizzly populations are maintained, especially if hunting is allowed. USFWS and states need to set strict caps on grizzly mortality and ensure mechanisms and funding are in place to reduce human-bear conflict. 3) Bear distribution. Scientists and concerned citizens have always maintained that in order to ensure a strong and stable population there must be a genetic connectivity to other grizzly populations in the Northern Rockies. I am concerned that pressure from hunting and other human-bear conflict will continue to isolate the Greater Yellowstone population. On an emotional and intellectual level I just don't believe an iconic animal such as the grizzly bear should be hunted. If they were restored to their historic range and allowed to roam the Rocky Mountains, the Great Plains and the Central Valley I might feel differently, but that is never going to happen. I think there is too much risk of increased mortality to bears if a spring and fall hunting season is opened. Finally, I don't think delisting is an appropriate tool of adaptive management when applied to conservation biology. I'm not sure it works well within the regulatory framework of the Endangered Species Act. It is too coarse, too slow, and does not allow for versatile adaptability. I think it will be much more challenging to relist the grizzly than it is to delist (which is proving challenging enough). The numbers might look good at this moment in time but I'm worried about the	FWS-R6-ES-2016-0042-5158	

One of the biggest problems is the lack of regulatory controls on grizzly bear mortality once delisting has occurred. With the lowest reproductive rate of any mammal in North America, grizzly bears cannot sustain many deaths, especially among adults. Most grizzlies die because people kill them, so controlling the rates at which we kill these animals is crucial. In fact, the ESA has been vital to reducing rates of human-caused grizzly bear mortality. (Willcox, 2016)	Factor B	I oppose delisting because delisting means that states which have shown themselves to be very unfriendly to predators will allow trophy hunting. These three states have already indicated as much - even though most Americans oppose trophy hunting of Yellowstone ecosystem's grizzly bears. One of the biggest problems is the lack of regulatory controls on grizzly bear mortality once delisting has occurred. With the lowest reproductive rate of any mammal in North America, grizzly bears cannot sustain many deaths, especially among adults. Most grizzlies die because people kill them, so controlling the rates at which we kill these animals is crucial. In fact, the ESA has been vital to reducing rates of human-caused grizzly bear mortality. (Willcox, 2016) The states of Montana, Idaho, and especially Wyoming exert huge pressures on the FWS to delist Yellowstone's grizzlies. Once delisted, the states will immediately sell trophy grizzly hunting permits for substantial amounts of money. (Peacock, 2014) Exactly how many hunting permits will be offered and how successful those hunts will be is unknown, but it is clear that an atmosphere will be created throughout the greater Yellowstone ecosystem where it is very easy to kill a grizzly for any reason. Grizzlies have one of the lowest reproductive rates of any land mammal; once the number of bear deaths outstrip the number of cubs born, the Yellowstone grizzly is on the road to extinction. (Peacock, 2015) The ESA represents the conscience of the broader public when it comes to grizzly bears and other imperiled species. By contrast, our state wildlife management agencies in the Northern Rockies represent the views of a politically influential minority whose interests focus on extractive uses of the natural world. State wildlife managers do not want to adopt binding restrictions because anything of this sort would put them at odds with their hunter constituency and their politically powerful masters in the energy and agriculture industries. (Willcox, 2016) I agree with Ms. Willcox. Your agency represents the American citizens - not just the fish and game departments of three states. American citizens do NOT want these bears delisted and they really do not want them hunted. Please listen to the science. Please listen to the citizens. Keep grizzly bears protected.	FWS-R6-ES-2016-0042-5161	
Grizzly mortality is also increasing. Even if there were an accurate count of grizzlies in the ecosystem, this should be cause for concern. Their range is also merely a fraction of what it was historically-somewhere around 4%. Is that really enough range to be considered recovered to a point where delisting can be an option?	Factor B	I do not support removing the GYE grizzly bear population protections. As a guide and educator in the Greater Yellowstone Ecosystem, I believe that there are some flaws with this proposal. First of all, two main food sources of Yellowstone grizzlies- Whitebark Pine Nuts and Cutthroat Trout- are not stable, and it is unclear what effect their further decline will have on grizzlies who rely heavily on them for food. The Center for Biological Diversity recognizes the threat of climate change on these food sources and therefore on the grizzly. Grizzly mortality is also increasing. Even if there were an accurate count of grizzlies in the ecosystem, this should be cause for concern. Their range is also merely a fraction of what it was historically-somewhere around 4%. Is that really enough range to be considered recovered to a point where delisting can be an option? Also, many Native American tribes oppose the delisting of the grizzly, and I stand by their opposition as the grizzly is culturally and environmentally important to them. Having seen the treatment of wolves in the states of Montana, Idaho, and Wyoming following their delisting, I have little confidence in the ability of the states to manage another large predator with trophy hunts. Wyoming had its control of wolves revoked; and I do not believe they will do any better with their control of grizzlies. The grizzly bear is still a recovering, threatened animal in the Greater Yellowstone Ecosystem.	FWS-R6-ES-2016-0042-5204	

The fact that the Northern Continental Divide Ecosystem bears are not on the chopping block is odd. There are more bears in that population, yet ours are threatened with less protection. The incredible pressure on this land for development of second (and third) homes, fracking, mining and general development is astonishing, and powerful enough to convince public officials we should throw caution to the wind and see how it goes. There was a 6% decrease in the past 2 years and at least 59 known dead last year (likely higher). This is a trend for the past few years. Actual numbers will rise and fall, but there is not an overall growth trend.	Factor B	I have spend a significant amount of time in Yellowstone from 1995 to present. I have a deep love for the Greater Yellowstone Ecosystem and want my children to be able to grow up and see this land as I have come to know it -- a large are a of relatively undisturbed habitat. Removing Grizzly Bears will drastically change the dynamics of the ecosystem. We are going to see a decrease in bears WITHOUT hunting, due to development and an increase in the human population in the Greater Yellowstone Ecosystem (GYE), especially after delisting when so much of their habitat will be opened to fracking, natural gas development, mining and trophy homes. By the time we need to re-list, which will most certainly happen due to a variety of reasons below, we will have lost critical habitat and many other species under the grizzly umbrella. Having lived in the GYE for the past 20 years, learning and teaching about this ecosystem, I promise you, this will have major effects. The number one threat to the GYE is climate change. We are currently experiencing an extinction rate 1000x greater than anything on the paleontological record, and it is our fault. Water availability affecting flora and fauna, foods for grizzlies, will be affected. Plants will be migrating up, or north and bears may not be able to follow them. A precarious population with an extremely low growth rate will not fare well under any circumstances, let alone one without utmost protection. Their threatened critical food sources (trout, whitebark pines) that are supposedly being replaced with other sources do not take into account the difference in caloric value, quality of food, seasonal needs, and availability without human interference. There are temporal, spatial, caloric and risk factors that aren't being addressed in the proposal.The "adaptable bear" argument is moot. US FWS must submit their population data for proper peer review (the Interagency Grizzly Bear Study Team doesn't count.) There may well be 700 bears, but it is suspect that the number nearly doubled in 2007 when delisting was on the table. It is suspect that for many yrs the population was 260-600, then all of a sudden it was a solid 700. The methods involve a lot of extrapolation from very few verifiable sightings and that should make us nervous. An independent, unbiased, qualified source can be trusted with the geographic data the IGBST is reticent to release. The fact that the Northern Continental Divide Ecosystem bears are not on the chopping block is odd. There are more bears in that population, yet ours are threatened with less protection. The incredible pressure on this land for development of second (and third) homes, fracking, mining and general development is astonishing, and powerful enough to convince public officials we should throw caution to the wind and see how it goes. There was a 6% decrease in the past 2 years and at least 59 known dead last year (likely higher). This is a trend for the past few years. Actual numbers will rise	FWS-R6-ES-2016-0042-5209	
- TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states known for their hatred and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of	Factor B	#NAME?	FWS-R6-ES-2016-0042-5249	

The United States Fish and Wildlife Service proposes to remove the Greater Yellowstone Ecosystem (GYE) Grizzly Bears from the Endangered and Threatened Wildlife list. Also, the affected states promise to continue to ensure the grizzly bear population remains. I think that delisting the Grizzly Bears would only work if there were policies that were strictly enforced to ensure the continuation of the grizzly bear population. The major worry is that human caused mortality will quickly exceed the grizzly bear reproduction. Grizzly bear reproduction is a slow process and about half the cubs do not survive. Based on the fact that they are slow reproducers I believe the bears should stay on the endangered list for at least 5-10 more years and then maybe slowly introduce different policies that may allow regulated hunting again.	Factor B	The United States Fish and Wildlife Service proposes to remove the Greater Yellowstone Ecosystem (GYE) Grizzly Bears from the Endangered and Threatened Wildlife list. Also, the affected states promise to continue to ensure the grizzly bear population remains. I think that delisting the Grizzly Bears would only work if there were policies that were strictly enforced to ensure the continuation of the grizzly bear population. The major worry is that human caused mortality will quickly exceed the grizzly bear reproduction. Grizzly bear reproduction is a slow process and about half the cubs do not survive. Based on the fact that they are slow reproducers I believe the bears should stay on the endangered list for at least 5-10 more years and then maybe slowly introduce different policies that may allow regulated hunting again. According to an article in the national geographic that addresses this issue, it is believed that if the very states that failed to ensure the populations of grizzly bears gain control again, the population will quickly dwindle. Also, it is believed that this means the laws implanted will not be enforced well by these states. According to the article, the bears are worth a billion annually alive than dead, so it is better to keep the hunting levels down. Another problem endangering the grizzly bears is habitat and food. According to Yellowstone, there has been a 15-20 percent loss of their genetic variability. This could cause "inbreeding and worsen problems stemming from food loss, habitat loss and conflicts with people. A lot of these problems have to do with increased interaction between bears and humans. Dr. Michael Gibeau has done a lot of research on the correlation between increased number of roads and bear mortality. Based on this information, bears are greatly affected by the amount of human interaction and can definitely stress them out. I believe that the best way to conserve the bears is to conserve their habitat and try to decrease the human interaction (for example by building fewer roads through their homes). In conclusion I think that the bears should not be delisted, at least not right now. When thinking about laws as a nation we must remember there will always be people who break the law. Therefore delisting them can cause people to break the rules more and more, as the laws become increasingly lenient.	FWS-R6-ES-2016-0042-0569	
The concern over sport hunting is real. There should be a moratorium on any sport hunting for 10 years to ensure the State is doing all it can to preserve grizzlies.	Factor B	1) The Primary Conservation Area... (PCA) does not include all of Grand Teton National Park and areas of the Northern Wind Rivers and Upper Green River where grizzlies have long been established. The PCA should be expanded and updated to include these and all areas where grizzlies are currently found. 2) Areas outside the PCA are referred to the Demographic Management Area (DMA). The DMA will be mostly managed by state agencies. Fortunately a good chunk of grizzly habitat falls within tribal lands (in WY) not subject to heavy handed state mismanagement of predators. 3) The entirety of the Wyoming Range, Caribou Range (Idaho), and the Targhee National Forest west of Jackson, WY should be included in the DMA. Grizzly populations currently in the Wyoming Range and other areas that fall outside of the DMA, are subject to extreme management actions and killing by hunters. No incentive to protect bears in suitable habitat outside the DMA. 4) Grizzlies located outside the PCA will be "allowed to expand into biologically suitable and socially acceptable areas". How does a state, hostile to predators, identify what is socially acceptable. A blank check for heavy handed management. Again, areas in the Upper Green, around Teton Park, and the northern Wind River Range with established grizzly populations most likely will see dramatic decreases in numbers. 5) Maintain only 500 grizzlies in the Greater Yellowstone Ecosystem (GYE). With estimates over 700, there is no motivation for the states to maintain grizzly numbers. 6) There is already a lot of human caused mortality outside the PCA, especially in the Upper Green River and Wind River areas. This probably will become worse since the State will have primary management control in these areas. 7) There are still healthy stands of Whitebark Pine outside the PCA in the Northern and Southern Wind Rivers, vital food for grizzlies. These areas will be primarily managed by the states. 8) The Wyoming management of grizzlies in the DMA as stated in their management plan, "significant consideration will be given to humans". We can only assume grizzlies will pay with their lives more often at the hands of state employees. Socially Accepted = Intolerance. 9) Wyoming Plan and handling of nuisance bears; "Grizzlies displaying natural aggression may be removed from the population." Natural aggression is defined as a grizzly defending itself, cubs, or food source. In the DMA, seems like grizzlies will be killed when they simply defend themselves by our intrusions. 10) A grizzly getting into chicken coups (without electric fences or other means to try and deter grizzlies) most likely will be killed by game managers, especially in the DMA. This is an alarming trend in grizzly country with the rise of people wanting to raise their own chickens. Outside of cattle and sheep, chickens are resulting in dead grizzlies. 11) The concern over sport hunting is real. There should be a moratorium on any sport hunting for 10 years to	FWS-R6-ES-2016-0042-0533	

It is too soon to remove the grizzly bear, because the long term effects of climate change on the species is too unknown to open the species up to state management, where the possibly for large scale hunting is very high.	Factor B	The delisting of the GYE grizzly bears is premature. The grizzly bear was listed in 1975, and saw large population growth and stabilization. It has been listed for forty-one years, and while there has been significant growth in the program, when considering the possible implications of climate change and hunting on the species, forty-one years is not long enough time of protection. In allowing the states to manage the GYE grizzly bear that will allow the GYE, a game species, to potentially be hunted. The proposed rule states that Idaho, Wyoming, and Montana have no current plans to allow the grizzly to be hunted, but that proposition will not last long. State fish and wildlife agencies are more pliable than the federal government, increased public pressure to hunt the bears will lead to state regulated hunting. The proposed rule outlines the perimeters for federal intervention and hunting allowances, but that outline is insufficient, because it does not consider the cumulative effects of climate change and hunting on the species. The proposed rule discusses the possible impacts of climate change on the species separate of direct human impacts. The proposed rules fails to view both of these large impacts congruently. The proposed rule states that the hunting allowances can be changed year to year, giving some flexibility to agency. But this flexibility may not be enough. A large fire or extreme drought stemming from climate change following hunting season could decimate the population, even if the following hunting season is cancelled. These two large population controls need to be consider in tandem. The grizzly population recovery is important, predator species are so very important to the health of western ecosystems. It is too soon to remove the grizzly bear, because the long term effects of climate change on the species is too unknown to open the species up to state management, where the possibly for large scale hunting is very high. Many in the west view predators as an issue, but that approach should not influence the delisting of the GYE grizzly, because the future effects of climate change are too unknown. Forty-one years of recovery should not be hastily dashed, because of public pressure on limiting predator species.	FWS-R6-ES-2016-0042-0591	
We should raise awareness on the issue of threatened species, global warming and extinction. Delisting the grizzly sends a message that will result in complacency and, even worse, HUNTING by the irresponsible state governments trying to appease special interests and market their state to a certain demographic.	Factor B	This is a bad move. It is a "feel good" action to help critics accept the Endanger Species Act. The Act became a law before the realization that global warming is our over-riding ecological (and existential!) issue. No mega fauna is now safe. Even more micro fauna and flora are threatened. Many species are ASSURED of extinction. We are presently in an era of mass extinctions. Sorry folks, but there is nothing but bad news on the environmental front when viewed long term, which is the only way these things should be viewed. To put a good face on the grizzly bear situation is purely a political move. We should raise awareness on the issue of threatened species, global warming and extinction. Delisting the grizzly sends a message that will result in complacency and, even worse, HUNTING by the irresponsible state governments trying to appease special interests and market their state to a certain demographic. Scientist need to lead and educate lay people about the state of wildlife preservation in this country and the world. Things do not look promising. We need to protect and expand grizzly habitat to have any hope of keeping this high level predator around. It is an amazingly adaptable animal, but there are limits. It is already stressed with the failure of at least two critical food sources in the GYE. We would be adding insult to injury to delist. The pressures against the bear's survival mount up every day. Visitation to the parks is at a record level (yet another stress to the grizzly population). Virtually all of those visitors want there to be as many bears as the carrying capacity will allow.	FWS-R6-ES-2016-0042-0718	

Increased mortalities will normally result in a greater number of lost females that would no longer contribute offspring	Factor B	I oppose delisting of the grizzly bear in the GYA, as I anticipate the bear would suffer immediate setbacks. As the human population is only increasing and will continue to increase into the future, the loss of habitat coupled with increased human conflicts and associated mortalities will only increase. The population is minimal at present, particularly when considering genetics and females. The likelihood for corridors to link the GYA bears with bears in other ecosystems is remote and will continue to decline. Increased mortalities will normally result in a greater number of lost females that would no longer contribute offspring. Any of the scientists involved with the IGBST know there is uncertainty in the outcome of delisting the grizzly bear. Why take the chance of screwing something up that has taken so long to establish? I urge USFWS to withdraw from their continued efforts to delist the grizzly bear.	FWS-R6-ES-2016-0042-0744	
There is no reason for hunting a bear other than sport and the money the states have proposed to charge for the hunting of this prized animal will in no way cover the cost the tax payers have already paid to protect that bear. It just doesn't make sense.	Factor B	I strongly OPPOSE the delisting of the GYE grizzlies. The grizzly is facing losses of some of their key food sources such as the white bark pine. This has been studied and the concerns of loss of these foods has been supported by the Ninth Circuit Court of Appeals, Federal District Judge Molloy. The cutthroat trout are also diminishing due to the introduction of non native species causing 2 of the grizzlies main food sources to scarce. With these food supplies short they must look elsewhere for new foods to replace these. With no protections outside the park they will not have the habitat needed to establish new food sources. The lack of food sources is what cause the very few and far between encounters with ranchers livestock. The adjoining states have already said and have it in their plans to allow killing of any grizzlies who pose a threat to their livestock. The reproduction rate of the grizzly is slow and without the necessary food sources to make it through hibernation there will be fewer births. If you consider this in conjunction with the amount of bears each state is going to allowed to be hunted, the number of bears that will inevitably be killed because due to ranchers seeing them as a threat to their livestock, the current population of bears will not stand the reduction without grave consequences. The citizens of the united states have paid for the protection of these bears. Your office has been charged with the duty of safe guarding these bears and delisting them without more thought and planning for the delisting will certainly put them back in an endangered state. The areas which border the GYE is becoming more heavily populated. With the encroachment of development the bears have very little space in which to travel from one population to another for breeding. If there are no safe guards for the bears to migrate to other areas the population will be trapped, this again brings them to the point of being endangered. There is no reason for hunting a bear other than sport and the money the states have proposed to charge for the hunting of this prized animal will in no way cover the cost the tax payers have already paid to protect that bear. It just doesn't make sense. The ranches are compensated by the numerous willing organizations for the loss of any animal killed by a bear. So it is not like the grizzlies are out there destroying herds of cattle. In fact as per your own studies the losses of ranchers has been minimal, and the ranchers do not loss money. At the very least the Primary Conservation area should be increased to include bear corridors, and am ample area around the entire GYE for the bears. Encounters with bears for people are rare, and most of those have proven it was not the bears fault, but the people's; regardless those bears have been killed. If people are going to go into bear country and not be prepared it is their fault and the entire population of bears should not have to pay the price for human stupidity. If you allow the states to openly place and	FWS-R6-ES-2016-0042-0739	

The states of Wyoming and Idaho allow for baiting of bears. They are saying it will not be allowed for the grizzly but it is not in their plan and when someone baits a black bear and a grizzly shows up that someone will shoot it and claim they thought it was a black bear. The current grizzly population cannot withstand these additional killings.	Factor B	I strongly OPPOSE the delisting of the GYE grizzlies. The grizzly is facing losses of some of their key food sources such as the white bark pine. This has been studied and the concerns of loss of these foods has been supported by the Ninth Circuit Court of Appeals, Federal District Judge Molloy. The cutthroat trout are also diminishing due to the introduction of non native species causing 2 of the grizzlies main food sources to scarce. With these food supplies short they must look elsewhere for new foods to replace these. With no protections outside the park they will not have the habitat needed to establish new food sources. The lack of food sources is what cause the very few and far between encounters with ranchers livestock. The adjoining states have already said and have it in their plans to allow killing of any grizzlies who pose a threat to their livestock. The reproduction rate of the grizzly is slow and without the necessary food sources to make it through hibernation there will be fewer births. If you consider this in conjunction with the amount of bears each state is going to allowed to be hunted, the number of bears that will inevitably be killed because due to ranchers seeing them as a threat to their livestock, the current population of bears will not stand the reduction without grave consequences. The citizens of the united states have paid for the protection of these bears. Your office has been charged with the duty of safe guarding these bears and delisting them without more thought and planning for the delisting will certainly put them back in an endangered state. The areas which border the GYE is becoming more heavily populated. With the encroachment of development the bears have very little space in which to travel from one population to another for breeding. If there are no safe guards for the bears to migrate to other areas the population will be trapped, this again brings them to the point of being endangered. There is no reason for hunting a bear other than sport and the money the states have proposed to charge for the hunting of this prized animal will in no way cover the cost the tax payers have already paid to protect that bear. It just doesn;t make sense. The ranches are compensated by the numerous willing organizations for the loss of any animal killed by a bear. So it is not like the grizzlies are out there destroying herds of cattle. In fact as per your own studies the losses of ranchers has been minimal, and the ranchers do not loss money. At the very least the Primary Conservation area should be increased to include bear corridors, and am ample area around the entire GYE for the bears. Encounters with bears for people are rare, and most of those have proven it was not the bears fault, but the people's; regardless those bears have been killed. If people are going to go into bear country and not be prepared it is their fault and the entire population of bears.	FWS-R6-ES-2016-0042-0739	
Trophy hunters would also kill female grizzlies, the reproductive engines of the ecosystem. Even if state game departments say, don't shoot bears with cubs at their side, a hunter need only claim he didn't see the little bears. Additionally, even experts can't unfailingly tell an adult female grizzly bear from a solitary male of equivalent size.	Factor B	The only certain outcome of delisting the Yellowstone grizzly bear is that it will result in trophy hunting of bears by the states of Wyoming, Montana, and Idaho. After spending a federal fortune each year since 1975 to bring the grizzly back from near extinction, we're now poised to abruptly begin killing them off for the bargain price of a hunting license. Why this fierce madness to kill our largest carnivore? I am a hunter who doesn't buy into the fatuous claims about the need to kill carnivores. Apex predators serve a complex and necessary role in ecological communities and in their own wild social communities. America's great bears today threaten our minds more than they do our bodies; by reminding us that upon occasions still possible today, we mighty humans were once just another flavor of meat. They challenge our notion of how we fit into the world and our dominion over it. And that's why we need them alive and roaming the land. A trophy hunt for grizzlies could begin, if we don't stop it, as early as next year. The danger is simple: In an isolated, island ecosystem like Yellowstone, once the number of dead bears greatly exceeds the number of cubs born, you're headed toward extinction. Here are the current stats: The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the, current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality. There is a very dark side to this lust for killing top carnivores. The first and easiest grizzlies to be killed will be the roadside bears of Yellowstone and Grand Teton national parks. These loved and most photographed bears have little fear of humans since wildlife is protected in national parks. Thousands of park visitors have thrilled over viewing grizzly bear families (mother bears with young are more frequent along roads). One famous mother grizzly, known as number 399, is now in hibernation but frequents roadways in Grand Teton. A Jackson Hole, Wyoming, outfitter has reportedly pledged that this is the first bear he would target: "because he hates federal government, bear-loving environmentalists and the Endangered Species Act," according to journalist Todd Wilkinson. Last year, during the furor over the killing of Cecil the African lion, Yellowstone park officials decided to kill another famous mother bear who had fatally mauled a photographer, and send her cubs to live in a zoo. The American public uploaded a ton of fumes on the park's superintendent. There is more: Delisting	FWS-R6-ES-2016-0042-0779	

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The unmistakable message is that the only measure of value of these magnificent animals is as a head on the wall or a rug on the floor. Of the reported 59 grizzlies killed in 2015, more than half were killed in interactions with hunters who mistook grizzlies for black bears or shot them just because they imagined themselves threatened. There has been virtually no penalty or fine for illegally killing a grizzly, even though serious penalties exist on the books. Even blatant poaching is dismissed with barely a swat on the wrist.	Factor B	The only certain outcome of delisting the Yellowstone grizzly bear is that it will result in trophy hunting of bears by the states of Wyoming, Montana, and Idaho. After spending a federal fortune each year since 1975 to bring the grizzly back from near extinction, we're now poised to abruptly begin killing them off for the bargain price of a hunting license. Why this fierce madness to kill our largest carnivore? I am a hunter who doesn't buy into the fatuous claims about the need to kill carnivores. Apex predators serve a complex and necessary role in ecological communities and in their own wild social communities. America's great bears today threaten our minds more than they do our bodies; by reminding us that upon occasions still possible today, we mighty humans were once just another flavor of meat. They challenge our notion of how we fit into the world and our dominion over it. And that's why we need them alive and roaming the land. A trophy hunt for grizzlies could begin, if we don't stop it, as early as next year. The danger is simple: In an isolated, island ecosystem like Yellowstone, once the number of dead bears greatly exceeds the number of cubs born, you're headed toward extinction. Here are the current stats: The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the, current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality. There is a very dark side to this lust for killing top carnivores. The first and easiest grizzlies to be killed will be the roadside bears of Yellowstone and Grand Teton national parks. These loved and most photographed bears have little fear of humans since wildlife is protected in national parks. Thousands of park visitors have thrilled over viewing grizzly bear families (mother bears with young are more frequent along roads). One famous mother grizzly, known as number 399, is now in hibernation but frequents roadways in Grand Teton. A Jackson Hole, Wyoming, outfitter has reportedly pledged that this is the first bear he would target: "because he hates federal government, bear-loving environmentalists and the Endangered Species Act," according to journalist Todd Wilkinson. Last year, during the furor over the killing of Cecil the African lion, Yellowstone park officials decided to kill another famous mother bear who had fatally mauled a photographer, and send her cubs to live in a zoo. The American public uploaded a ton of fumes on the park's superintendent. There is more: Delisting	FWS-R6-ES-2016-0042-0779	

Trophy hunters would also kill female grizzlies, the reproductive engines of the ecosystem. Even if state game departments say, don't shoot bears with cubs at their side, a hunter need only claim he didn't see the little bears. Additionally, even experts can't unfailingly tell an adult female grizzly bear from a solitary male of equivalent size.	Factor B	The only certain outcome of delisting the Yellowstone grizzly bear is that it will result in trophy hunting of bears by the states of Wyoming, Montana, and Idaho. After spending a federal fortune each year since 1975 to bring the grizzly back from near extinction, we're now poised to abruptly begin killing them off for the bargain price of a hunting license. Why this fierce madness to kill our largest carnivore? I am a hunter who doesn't buy into the fatuous claims about the need to kill carnivores. Apex predators serve a complex and necessary role in ecological communities and in their own wild social communities. America's great bears today threaten our minds more than they do our bodies; by reminding us that upon occasions still possible today, we mighty humans were once just another flavor of meat. They challenge our notion of how we fit into the world and our dominion over it. And that's why we need them alive and roaming the land. A trophy hunt for grizzlies could begin, if we don't stop it, as early as next year. The danger is simple: In an isolated, island ecosystem like Yellowstone, once the number of dead bears greatly exceeds the number of cubs born, you're headed toward extinction. Here are the current stats: The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the, current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality. There is a very dark side to this lust for killing top carnivores. The first and easiest grizzlies to be killed will be the roadside bears of Yellowstone and Grand Teton national parks. These loved and most photographed bears have little fear of humans since wildlife is protected in national parks. Thousands of park visitors have thrilled over viewing grizzly bear families (mother bears with young are more frequent along roads). One famous mother grizzly, known as number 399, is now in hibernation but frequents roadways in Grand Teton. A Jackson Hole, Wyoming, outfitter has reportedly pledged that this is the first bear he would target: "because he hates federal government, bear-loving environmentalists and the Endangered Species Act," according to journalist Todd Wilkinson. Last year, during the furor over the killing of Cecil the African lion, Yellowstone park officials decided to kill another famous mother bear who had fatally mauled a photographer, and send her cubs to live in a zoo. The American public unloaded a ton of fury on the park's superintendent. There is more. Delisting	FWS-R6-ES-2016-0042-0779	
We know that if de-listed, Wyoming, Montana, and likely Idaho will enable trophy hunting of the grizzly. People taking out the dominate males from a stressed population will be bad for the species.	Factor B	I am against removing protection from grizzlies in the Yellowstone ecosystem by de-listing. We do not know how the current population of grizzlies will respond to their recent increase in human caused mortality, reduction in white bark pine nuts, reduction in Yellowstone Cutthroat, and reduction in the elk population. We know that if de-listed, Wyoming, Montana, and likely Idaho will enable trophy hunting of the grizzly. People taking out the dominate males from a stressed population will be bad for the species. The bears need at least five more years of protection to determine how the population will fare before we start hunting them. I am a Westerner, living in Idaho for over 36 years.	FWS-R6-ES-2016-0042-1083	

Grizzly food sources are in decline, cub mortality rate is high, there is no connectivity between GYE and NCD ecosystems, human-caused mortality rate is high.	Factor B	See Attached Attachments Cardori Zachary	FWS-R6-ES-2016-0042-1139	
Call it an upgrade in condition, but please do not open the door to hunting, especially trophy hunting, which is a cruel and despicable waste of life. Bears that come too close to private property and human habitations should be darted and relocated, and killed only on the rare occasions that they come back and cause damage.	Factor B	Please do not delist Grizzly bears. It's unfortunate that in our society, there seem to be only two categories of management: "listed under the ESA" or "open season." I do not trust state fish and game agencies to manage these animals responsibly. They only serve hunters, trappers and outfitters, and do not care about conservation biology. We can see what a mess they have made of wolf management in all the states that have delisted wolves. I'm not saying that management is not required, but I am saying that state game agencies are political entities that have demonstrated no interest in these species, other than as targets for hunters. They even hold wildlife "derbies," which is illustrative of their mindset. We need a different kind of management - ecosystem management - and the FWS is the entity best able to carry this out. The ESA requires the government to recover not only species, but the "ecosystems upon which they depend," and until we have re-established those functioning ecosystems, individual species should remain listed, perhaps in a "threatened" status. Call it an upgrade in condition, but please do not open the door to hunting, especially trophy hunting, which is a cruel and despicable waste of life. Bears that come too close to private property and human habitations should be darted and relocated, and killed only on the rare occasions that they come back and cause damage. I would submit that the Greater Yellowstone Ecosystem needs more habitat protection, so that large animals (elk, wolves, bears, bison, etc.) can move freely without being killed by humans. The real answer is not to keep bears to a minimum "viable" population and call that "recovery," but to provide more habitat. I recognize the difficulty in that, but I urge you to work toward establishment of the great Yellowstone-to-Yukon corridor, which is the only lasting hope of survival for these great charismatic species. No good can come of hunting grizzly bears.	FWS-R6-ES-2016-0042-5335	

I oppose allowing trophy hunting of bears. This type of hunting has far more to do with economic opportunism than bear management. The states of MT, WY and ID have shown a strong predilection for hunting, almost as a philosophical goal, rather than necessarily the best management option. I do not support managing the GYE bear population for a target population of 674 bears, and encouraging the discretionary harvest (hunting) of independent bears to maintain this population target. Rather, the GYE grizzly population should be allowed to expand, if it can. (And I am not at all convinced that the GYE population will continue to increase, given known disruptions to its primary food sources, and our lack of knowledge about the sustainability of whatever they are currently using as alternatives.) It would be advantageous for recovery to encourage independent males and females to leave the GYE area and connect with adjacent populations, improving genetic diversity and expanding the overall geographic extent of the species.	Factor B	See Attached Attachments Weiner Gary	FWS-R6-ES-2016-0042-1229	
The species is not subject to overutilization by humans, but represents an important keystone species, especially in the Greater Yellowstone region. Grizzlies and wolves have been deemed the main attractions in the park, and the rising nature related tourism is worth \$1 billion annually. We currently utilize the bear population for profit in an eco-friendly and manageable way. Delisting the bears would threaten the ecotourism balance we have just acquired in the past decade.	Factor B	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	

The main predator and reason for listing the Grizzly bear on the ESA is the human. Unfortunately, even with the recovered population, or rising numbers of bears, researchers in the Montana state Grizzly bear proposal agree that the grizzlies still have low reproductive rates and that grizzly populations are very susceptible to human impacts. They continue to say that actual population numbers are almost impossible to detect, and they use population estimates instead. With these facts, how is it feasible to restart trophy sport hunting of the grizzlies? Especially if an increase in human bear encounters has been shown to increase bear aggression toward people.	Factor B	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	
While the plan does not mention an intended grizzly hunt, I can only guess it's impending. I do not support a hunt at this time especially in or AROUND Yellowstone. And definitely not in any area that interrupts the bears' passage to find mates. And if you allow hunts, how will hunters differentiate between males and mothers with cubs that depend on her for survival? Or will they even care? Starving, motherless cubs is not acceptable. This plan is no plan without addressing these points.	Factor B	I am a proud American and value what makes this country unique, including our land and wildlife. After hearing of the debate about Grizzly Bear delisting, not only was I disappointed, but angry. Angry because, once again, it seems those who are paid by American citizens to manage and protect our countries treasures are bowing to some wealthy political lobbyists. We have torn down forests, paved over habitat, wiped out entire species, and built our capitalist shrines throughout this nation. It is past time to reign in our greed and arrogance. It is time to take pride in this country's life. Delisting will only bring hunts... And hunts contributed to the grizzly numbers dropping to less than 200 in the 70s. I DO NOT SUPPORT DELISTING the grizzly or the Yellowstone Draft Plan due to the lack of protection offered to the great Grizzly Bear. These bears need to travel to find mates. How can this species not only survive, but thrive, when their gene pool is so isolated? They need to be able to travel to find mates who offer gene diversity without the threat of hunters, habitat loss, or disgruntled ranchers. These bears should be able to expand their territory to sustain their species without human threat. These ranchers need to man up... Stop blaming the bear and wolves for trying to survive on what little land we've left for them. Ranchers are the intruders. They need to take more precautions before taking out their rifles on my land. This is PUBLIC LAND PAID FOR BY TAXPAYERS and most of us want the wildlife to stay in tact. Also, the plan talks about waiting for THREE years of lowered bear population before action is taken. With what I know about the difficult and slow reproductive rates of these bears, I consider THREE years too long without a response by a management team. After all, it took grizzly bears 40 years to raise their numbers to only about 700. While the plan does not mention an intended grizzly hunt, I can only guess it's impending. I do not support a hunt at this time especially in or AROUND Yellowstone. And definitely not in any area that interrupts the bears' passage to find mates. And if you allow hunts, how will hunters differentiate between males and mothers with cubs that depend on her for survival? Or will they even care? Starving, motherless cubs is not acceptable. This plan is no plan without addressing these points. Please consider my words while remembering the dire state of the worlds wildlife. Be part of the solution. With deep concern, Ang Sutton	FWS-R6-ES-2016-0042-1373	

The recent announcement of the illegal killing (in November 2015) of beloved Yellowstone Patriarch, Scarface, sent shock waves through the millions of visitors to Yellowstone who knew and loved him. He was a legend-Yellowstone's dignified Ambassador. A 25+ year veteran of Yellowstone he was followed by professional photographers and nature lovers alike. Visitors came to the Park each year to catch a glimpse of this famous bear. Scarface was a model bear who was habituated to humans as are many of Yellowstone's "roadside bears". He was good natured and non aggressive which makes his death all the more tragic. He should have never been killed. One person's irresponsible act, robbed Scarface of his final years and denied me and millions of others who loved him of the privilege and opportunity to observe him in the wild. What happened to Scarface is a cautionary tale of the fate that awaits all of Yellowstone's Grizzly bears. If delisted each bear will have a bounty on its head. These magnificent icons of our heritage will be decimated by Trophy Hunters who have already readied their high powered rifles to take out the most famous roadside bear of them all-Bear 399. We must not allow this tragedy to repeat itself	Factor B	The recent announcement of the illegal killing (in November 2015) of beloved Yellowstone Patriarch, Scarface, sent shock waves through the millions of visitors to Yellowstone who knew and loved him. He was a legend-Yellowstone's dignified Ambassador. A 25+ year veteran of Yellowstone he was followed by professional photographers and nature lovers alike. Visitors came to the Park each year to catch a glimpse of this famous bear. Scarface was a model bear who was habituated to humans as are many of Yellowstone's "roadside bears". He was good natured and non aggressive which makes his death all the more tragic. He should have never been killed. One person's irresponsible act, robbed Scarface of his final years and denied me and millions of others who loved him of the privilege and opportunity to observe him in the wild. What happened to Scarface is a cautionary tale of the fate that awaits all of Yellowstone's Grizzly bears. If delisted each bear will have a bounty on its head. These magnificent icons of our heritage will be decimated by Trophy Hunters who have already readied their high powered rifles to take out the most famous roadside bear of them all-Bear 399. We must not allow this tragedy to repeat itself. Forty years of work and millions of dollars were invested to save Grizzly Bears from extinction. Despite these efforts, the Grizzly bear population is still dangerously low. Removing the protections afforded by the Endangered Species Act will bring the demise of the Grizzlies. Please do not bend to the desires of hunters, the dictates of ranchers or the demands of developers at the expense of Yellowstone's Grizzly bears. We owe it to future generations to ensure that Grizzlies will forever roam wild and free in Yellowstone. Please do not delist Yellowstone's Grizzly bears.	FWS-R6-ES-2016-0042-1554	
Forty years of work and millions of dollars were invested to save Grizzly Bears from extinction. Despite these efforts, the Grizzly bear population is still dangerously low. Removing the protections afforded by the Endangered Species Act will bring the demise of the Grizzlies. Please do not bend to the desires of hunters, the dictates of ranchers or the demands of developers at the expense of Yellowstone's Grizzly bears.	Factor B	The recent announcement of the illegal killing (in November 2015) of beloved Yellowstone Patriarch, Scarface, sent shock waves through the millions of visitors to Yellowstone who knew and loved him. He was a legend-Yellowstone's dignified Ambassador. A 25+ year veteran of Yellowstone he was followed by professional photographers and nature lovers alike. Visitors came to the Park each year to catch a glimpse of this famous bear. Scarface was a model bear who was habituated to humans as are many of Yellowstone's "roadside bears". He was good natured and non aggressive which makes his death all the more tragic. He should have never been killed. One person's irresponsible act, robbed Scarface of his final years and denied me and millions of others who loved him of the privilege and opportunity to observe him in the wild. What happened to Scarface is a cautionary tale of the fate that awaits all of Yellowstone's Grizzly bears. If delisted each bear will have a bounty on its head. These magnificent icons of our heritage will be decimated by Trophy Hunters who have already readied their high powered rifles to take out the most famous roadside bear of them all-Bear 399. We must not allow this tragedy to repeat itself. Forty years of work and millions of dollars were invested to save Grizzly Bears from extinction. Despite these efforts, the Grizzly bear population is still dangerously low. Removing the protections afforded by the Endangered Species Act will bring the demise of the Grizzlies. Please do not bend to the desires of hunters, the dictates of ranchers or the demands of developers at the expense of Yellowstone's Grizzly bears. We owe it to future generations to ensure that Grizzlies will forever roam wild and free in Yellowstone. Please do not delist Yellowstone's Grizzly bears.	FWS-R6-ES-2016-0042-1554	

Federal delisting and subsequent hunting, as well as the imminent extinction of a key food source, due to global warming, spell disaster for the iconic grizzly bears of the Greater Yellowstone Ecosystem.	Factor B	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530	
Environmentalists will freak out that hunters can hunt these majestic animals again, but they don't realize how much money goes towards the environment from hunters. In a paper called Right to Hunt vs. Animal Rights by Jim Amrhein, he shows all of the figures. Hunters all together across the United States paid \$746 million on licenses and public land access fees alone. An additional \$300 million was contributed to conservation by 10,000 hunting organizations. \$4.2 billion is the amount contributed to conservation through a 10% federal excise taxes on firearms, ammunition, and gear. When all that is added together it equals \$5,246,000,000 contributed by hunters across the United States last year. It isn't going to be open season on these bears. There are still going to be conservation lands where these animals are protected. Hunters will have to buy hunting tags. There won't be any more poaching of the bears than there already is today. The only difference is that now the \$5 billion will only go up, because more people want to hunt a grizzly bear and are willing to pay for it. This will benefit other species as well as the grizzly bear, because it is easier for a struggling population to rebound on several million acres of well-maintained, patrolled conservation land that is paid for by hunters.	Factor B	See attached file(s) Attachments (GYE) Grizzly	FWS-R6-ES-2016-0042-1581	

Decisions on Grizzly bear populations cannot be based on the present, because a changing habitat pictures is rapidly evolving and more, not less, bears are needed and bears not stressed by hunting.	Factor B	See Attached Attachments Trygstad Ellen	FWS-R6-ES-2016-0042-1607	
By removing these bears of the Endangered Species Act, we are removing the bear's only form protection from hunting. If these bears are delisted, hunting these bears as a trophy would increase. Hunting of these animals poses a large problem not only for the animal but for the environment. Research shows that the removal of large predators has a large negative effect on the environment and the species that live within that environment because it disrupts the delicate balances between predator and prey, that tend to balance the whole. There are many examples of this throughout our history; we saw the large effect hunting had in Yellowstone National park when several decades ago gray wolves were hunted to near extinction. After the mass hunting of the wolves, vegetation across Yellowstone decreased due to overgrazing of the elk, the population of elk increase exponentially and overall biodiversity within Yellowstone decreased. If Grizzlies bears are delisted and hunted due to the removal of federal protection, I worry that the effect to both the animal and the environment will be substantial.	Factor B	See attached file(s) Attachments grizzly bears	FWS-R6-ES-2016-0042-1668	

“The first bears to be killed in a trophy sport hunt are likely to be celebrities such as Grizzly 399 that make their living along roadsides in Grand Teton and Yellowstone Parks, where they give thousands of visitors the thrill of a lifetime. These tolerant bears, which live partly on National Forest lands outside parks, would be especially vulnerable to hunting if federal protections are lifted later this year. These bears are comfortable with people and would be relatively easy to find. Moreover, certain local thugs have stated outright that they will be out to kill these much-beloved grizzlies” out of spite.”	Factor B	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530	
Trophy hunting of the grizzly is not sound management of the speices. There should be a three to five year moratorium on even considering hunting as a management tool.	Factor B	I say NO to the delisting of Grizzly Bears. Trophy hunting of the grizzly is not sound management of the speices. There should be a three to five year moratorium on even considering hunting as a management tool. GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it	FWS-R6-ES-2016-0042-1783	

It is extremely concerning that this draft rule fails to address hunting inside of the John D. Rockefeller Parkway, key habitat connecting bears between Grand Teton and Yellowstone National Parks. Under the current proposal, hunting could occur on lands directly adjacent to national parks as well as key habitat that could link Yellowstone's grizzly bears to grizzlies from GNP.	Factor B	As trained scientist, physician and someone that has been following the science related to Grizzlies, I'm opposed to delisting the GYE Grizzly bears because the plan is inadequate and does not account for the many challenges this population will continue to face. Grizzlies are a keystone species of our national parks and wild places, making the U.S Fish and Wildlife Service's proposal to remove the Greater Yellowstone Ecosystem grizzly from the Endangered Species List a serious concern. The post-delisting management of bears must be based on sound science and provide adequate protections to ensure the long-term survival of this iconic population. Frustratingly, this draft rule released for public review is incomplete, it fails to provide details that will impact bears in our national parks. It also relies on outdated state plans, one a decade old, for grizzly management. The draft rule is missing critical information to outline how state agencies will partner with the National Park Service, in addressing bear management on lands adjacent to national parks. It is extremely concerning that this draft rule fails to address hunting inside of the John D. Rockefeller Parkway, key habitat connecting bears between Grand Teton and Yellowstone National Parks. Under the current proposal, hunting could occur on lands directly adjacent to national parks as well as key habitat that could link Yellowstone's grizzly bears to grizzlies from GNP. We have spent millions of dollars to restore grizzly bears to GYE and we must continue these conservation efforts in perpetuity, preserving the important roles they play in maintaining healthy and diverse environments. Rather than delisting grizzlies and opening up hunting immediately - our efforts should be focused on connecting this isolated genetic population to grizzlies in the North.	FWS-R6-ES-2016-0042-1910	
The population will be put in jeopardy as they will be at the mercy of hunters and improper state management. We do not even know at this time what severe effects may happen to the Grizzly bear population due to global warming.	Factor B	See Attached Attachments Davison Dennis	FWS-R6-ES-2016-0042-2007	

I strongly feel that once a population (of any specie) has reached and exceeded pre-determined objectives for recovery, the management of the recovered population should be turned over to the state. Historically, states' management of species through licensed hunting seasons has proven effective at protecting and bolstering populations. Revenue via licensing goes to protect these populations via habitat protection and law enforcement.	Factor B	As a hunter, living in Massachusetts and quite removed from the GYE, I am writing in support of the de-listing of the Grizzly bear from the Endangered and Threatened Wildlife list. I strongly feel that once a population (of any specie) has reached and exceeded pre-determined objectives for recovery, the management of the recovered population should be turned over to the state. Historically, states' management of species through licensed hunting seasons has proven effective at protecting and bolstering populations. Revenue via licensing goes to protect these populations via habitat protection and law enforcement. By continually moving the goal posts for what "recovery" is for a population and allowing anti-hunting interests to litigate away the biologists recommendations, we loose the power of the North American Model for Wildlife Conservation to protect population for future generations to experience. Please stay true to the ESA and the North American Model and move to de-list the grizzly bear in the GYE.	FWS-R6-ES-2016-0042-2109	
Please do NOT delist the Grizzly Bear from the Federal List of Endangered and Threatened Wildlife. Trophy hunting is alive and well, and equally unmanaged in the United States. Please reconsider and do not remove them at this time. People will go nuts and decimate them - after a significant effort to reintroduce and regrow. They can be carefully managed by the FWS	Factor B	Please do NOT delist the Grizzly Bear from the Federal List of Endangered and Threatened Wildlife. Trophy hunting is alive and well, and equally unmanaged in the United States. Please reconsider and do not remove them at this time. People will go nuts and decimate them - after a significant effort to reintroduce and regrow. They can be carefully managed by the FWS.	FWS-R6-ES-2016-0042-2130	

Poaching is bad enough but sanctioned hunting would open doors that should remain firmly shut and locked. People have hunted many species of wild animals to extinction with dire effects on the wildlife food chains, and many more years of study are necessary before anyone can claim the loss of grizzly bears through hunting or other killing could be of any positive benefit.	Factor B	I oppose vigorously the delisting of Grizzly Bears from the Federal List of Endangered and Threatened wildlife. In no way can you ever consider Grizzly Bears to be not endangered. There can be no justification for delisting them, no benefit to anybody except trophy hunters, certainly not a benefit to wildlife in America. Grizzly Bears reproduce and replace their population slowly, and we have almost hunted them to extinction before. Poaching is bad enough but sanctioned hunting would open doors that should remain firmly shut and locked. People have hunted many species of wild animals to extinction with dire effects on the wildlife food chains, and many more years of study are necessary before anyone can claim the loss of grizzly bears through hunting or other killing could be of any positive benefit. There is positive benefit to protecting them in that they are a part of our ecosystem, history and heritage, and their place in America serves purposes in the ecosystem and food chain that cannot be measured in black and white. In summary, I OPPOSE the proposed rule and urge Fish and Wildlife to continue protecting this majestic animal along with others that are vulnerable to trophy hunting to extinction.	FWS-R6-ES-2016-0042-2349	
Just because the population is has increased isn't enough reason to open the doors to hunting of these animals. Especially since you have noted in your Proposal: Grizzly bears have one of the slowest reproductive rates among terrestrial mammals, resulting primarily from the reproductive factors described above: Late age of first reproduction, small average litter size, and the long interval between litters.... Given the above factors, it may take a female grizzly bear 10 or more years to replace herself in a population. Grizzly bear females cease reproducing some time in their mid-to-late 20s. Doesn't this indicate that if you allow hunting of the Grizzly, it would become necessary down the road to institute a protected status again? Additionally, to further quote your Proposed Rule, "For grizzly bear populations, lambda estimates the average rate of annual growth, with a value of 1.0 indicating a stable population trend with no net growth or decline," if the lambda is stable, wouldn't allowing hunting begin to reduce the population to a negative lambda? Why promote hunting a species that has been designated at risk of extinction not so long ago. Can we not allow the stability to continue? And again from your Proposed Rule: "For long-lived mammals such as grizzly bears, extensive data collected over decades are needed to understand if and how these factors are operating in a population. We have these data for the GYE grizzly bear population, and the IGBST has been able to tease apart some of these confounding effects to find that density-dependent effects are the likely cause of the recent slow in population growth (see Changes in Food Resources under Factor E, below, for more detailed information)." If the population growth is slowing, let's not impose further growth reduction through hunting. Your report indicates: "Grizzly bears are a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality and the manageable nature of this threat." Let's continue to protect, not weed out through hunting permits. I don't have a problem with management removals, but I don't trust that hunting can be well-regulated. The purpose of hunting Grizzlies would be for trophies, not food. This is not a good use of management techniques. Controlling human interaction with the Grizzly population is a more suitable management procedure. Hunting is the worst possible approach. Please do not allow hunting of the Grizzly. Please. Chesa Keane	Factor B	Just because the population is has increased isn't enough reason to open the doors to hunting of these animals. Especially since you have noted in your Proposal: Grizzly bears have one of the slowest reproductive rates among terrestrial mammals, resulting primarily from the reproductive factors described above: Late age of first reproduction, small average litter size, and the long interval between litters.... Given the above factors, it may take a female grizzly bear 10 or more years to replace herself in a population. Grizzly bear females cease reproducing some time in their mid-to-late 20s. Doesn't this indicate that if you allow hunting of the Grizzly, it would become necessary down the road to institute a protected status again? Additionally, to further quote your Proposed Rule, "For grizzly bear populations, lambda estimates the average rate of annual growth, with a value of 1.0 indicating a stable population trend with no net growth or decline," if the lambda is stable, wouldn't allowing hunting begin to reduce the population to a negative lambda? 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Additionally, to further quote your Proposed Rule, "For grizzly bear populations, lambda estimates the average rate of annual growth, with a value of 1.0 indicating a stable population trend with no net growth or decline," If the lambda is stable, wouldn't allowing hunting begin to reduce the population to a negative lambda? Why promote hunting a species that has been designated at risk of extinction not so long ago. Can we not allow the stability to continue?	Factor B	Just because the population is has increased isn't enough reason to open the doors to hunting of these animals. Especially since you have noted in your Proposal: Grizzly bears have one of the slowest reproductive rates among terrestrial mammals, resulting primarily from the reproductive factors described above: Late age of first reproduction, small average litter size, and the long interval between litters.... Given the above factors, it may take a female grizzly bear 10 or more years to replace herself in a population. Grizzly bear females cease reproducing some time in their mid-to-late 20s. Doesn't this indicate that if you allow hunting of the Grizzly, it would become necessary down the road to institute a protected status again? Additionally, to further quote your Proposed Rule, "For grizzly bear populations, lambda estimates the average rate of annual growth, with a value of 1.0 indicating a stable population trend with no net growth or decline," If the lambda is stable, wouldn't allowing hunting begin to reduce the population to a negative lambda? Why promote hunting a species that has been designated at risk of extinction not so long ago. Can we not allow the stability to continue? And again from your Proposed Rule: "For long-lived mammals such as grizzly bears, extensive data collected over decades are needed to understand if and how these factors are operating in a population. We have these data for the GYE grizzly bear population, and the IGBST has been able to tease apart some of these confounding effects to find that density-dependent effects are the likely cause of the recent slow in population growth (see Changes in Food Resources under Factor E, below, for more detailed information).," If the population growth is slowing, let's not impose further growth reduction through hunting. Your report indicates: "Grizzly bears are a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality and the manageable nature of this threat." Let's continue to protect, not weed out through hunting permits. I don't have a problem with management removals, but I don't trust that hunting can be well-regulated. The purpose of hunting Grizzlies would be for trophies, not food. This is not a good use of management techniques. Controlling human interaction with the Grizzly population is a more suitable management procedure. Hunting is the worst possible approach. Please do not allow hunting of the Grizzly. Please. Chesa Keane	FWS-R6-ES-2016-0042-2469	
Your report indicates: "Grizzly bears are a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality and the manageable nature of this threat." Let's continue to protect, not weed out through hunting permits. I don't have a problem with management removals, but I don't trust that hunting can be well-regulated. The purpose of hunting Grizzlies would be for trophies, not food. This is not a good use of management techniques.	Factor B	Just because the population is has increased isn't enough reason to open the doors to hunting of these animals. Especially since you have noted in your Proposal: Grizzly bears have one of the slowest reproductive rates among terrestrial mammals, resulting primarily from the reproductive factors described above: Late age of first reproduction, small average litter size, and the long interval between litters.... Given the above factors, it may take a female grizzly bear 10 or more years to replace herself in a population. Grizzly bear females cease reproducing some time in their mid-to-late 20s. Doesn't this indicate that if you allow hunting of the Grizzly, it would become necessary down the road to institute a protected status again? Additionally, to further quote your Proposed Rule, "For grizzly bear populations, lambda estimates the average rate of annual growth, with a value of 1.0 indicating a stable population trend with no net growth or decline," If the lambda is stable, wouldn't allowing hunting begin to reduce the population to a negative lambda? Why promote hunting a species that has been designated at risk of extinction not so long ago. Can we not allow the stability to continue? And again from your Proposed Rule: "For long-lived mammals such as grizzly bears, extensive data collected over decades are needed to understand if and how these factors are operating in a population. We have these data for the GYE grizzly bear population, and the IGBST has been able to tease apart some of these confounding effects to find that density-dependent effects are the likely cause of the recent slow in population growth (see Changes in Food Resources under Factor E, below, for more detailed information).," If the population growth is slowing, let's not impose further growth reduction through hunting. Your report indicates: "Grizzly bears are a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality and the manageable nature of this threat." Let's continue to protect, not weed out through hunting permits. I don't have a problem with management removals, but I don't trust that hunting can be well-regulated. The purpose of hunting Grizzlies would be for trophies, not food. This is not a good use of management techniques. Controlling human interaction with the Grizzly population is a more suitable management procedure. Hunting is the worst possible approach. Please do not allow hunting of the Grizzly. Please. Chesa Keane	FWS-R6-ES-2016-0042-2469	

Controlling human interaction with the Grizzly population is a more suitable management procedure. Hunting is the worst possible approach.	Factor B	Just because the population is has increased isn't enough reason to open the doors to hunting of these animals. Especially since you have noted in your Proposal: Grizzly bears have one of the slowest reproductive rates among terrestrial mammals, resulting primarily from the reproductive factors described above: Late age of first reproduction, small average litter size, and the long interval between litters.... Given the above factors, it may take a female grizzly bear 10 or more years to replace herself in a population. Grizzly bear females cease reproducing some time in their mid-to-late 20s. Doesn't this indicate that if you allow hunting of the Grizzly, it would become necessary down the road to institute a protected status again? Additionally, to further quote your Proposed Rule, "For grizzly bear populations, lambda estimates the average rate of annual growth, with a value of 1.0 indicating a stable population trend with no net growth or decline," If the lambda is stable, wouldn't allowing hunting begin to reduce the population to a negative lambda? Why promote hunting a species that has been designated at risk of extinction not so long ago. Can we not allow the stability to continue? And again from your Proposed Rule: "For long-lived mammals such as grizzly bears, extensive data collected over decades are needed to understand if and how these factors are operating in a population. We have these data for the GYE grizzly bear population, and the IGBST has been able to tease apart some of these confounding effects to find that density-dependent effects are the likely cause of the recent slow in population growth (see Changes in Food Resources under Factor E, below, for more detailed information)." If the population growth is slowing, let's not impose further growth reduction through hunting. Your report indicates: "Grizzly bears are a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality and the manageable nature of this threat." Let's continue to protect, not weed out through hunting permits. I don't have a problem with management removals, but I don't trust that hunting can be well-regulated. The purpose of hunting Grizzlies would be for trophies, not food. This is not a good use of management techniques. Controlling human interaction with the Grizzly population is a more suitable management procedure. Hunting is the worst possible approach. Please do not allow hunting of the Grizzly. Please. Chesa Keane	FWS-R6-ES-2016-0042-2469	
Even though grizzly bears have made a comeback of sorts, removing them from protection would be putting them back at risk of being killed by human beings just for sport or some other weak excuse.	Factor B	Please DO NOT REMOVE grizzly bears from the list of endangered and threatened wildlife in the Greater Yellowstone Ecosystem. Even though grizzly bears have made a comeback of sorts, removing them from protection would be putting them back at risk of being killed by human beings just for sport or some other weak excuse. That is disgusting. No wild animals anywhere should be killed just for sport. Let's protect our wildlife in Yellowstone and elsewhere. If fact, extend the protection zone outside the Park to 100 miles outside the park to protect those who wander outside.	FWS-R6-ES-2016-0042-2490	

De-listing x will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. A	Factor B	De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, seasonable resilience, and availability throughout the habitat. The Greater Yellowstone Ecosystem (GYE) population is much smaller than the Northern Range bears, but the Northern population is not being considered for de-listing. The GYE population is being threatened because industrial, energy, and development companies have been applying tremendous political pressure through lobbying and heavy-handed public relations campaigns (promising jobs, dismissing science; the usual stuff). The GYE grizzlies are an "island population". This means that they are adapted to live and thrive within a specific geographic range. Substantial threats or changes to that habitat would likely pressure the bears to try and relocate, but they cannot successfully do so. The Greater Yellowstone Ecosystem is the environment to which they have adapted over eons. There is not another environment to which they could relocate and remain a viable species. Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability. US Fish and Wildlife data regarding the GYE grizzly population is suspect at best. For years, most counts of the population were in the 200 to 400 range. When de-listing was first proposed in 2007, the number suddenly shot up to 700. The methods used to arrive at that number involve a great deal of extrapolation from an extremely small sample of verified sightings. Rather than relying on US FWS data (pressured by lobbyists and hostile legislators), the public should demand research by independent organizations like The Ecological Society of America or the National Research Council. Current population estimates are untrustworthy, and the field needs good peer-reviewed analysis by objective scientists. If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it.	FWS-R6-ES-2016-0042-2542	
Subjecting Grizzly Bears to ego-driven hunters eager to needlessly kill them and then mount their carcasses on walls seems incredibly shortsighted, and contrary to good stewardship.	Factor B	I vehemently oppose removing Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I cannot understand any eagerness to erode the tenuous gains Grizzly Bears have made since being included on the list. Subjecting Grizzly Bears to ego-driven hunters eager to needlessly kill them and then mount their carcasses on walls seems incredibly shortsighted, and contrary to good stewardship. It is imperative that America's National Parks and their inhabitants be protected to the best of our ability. We do this for all Americans - current and future. We cannot shirk our duties. The beauty of our Parks and the wildlife they support must be preserved. If we fail in our duty, we are all diminished.	FWS-R6-ES-2016-0042-2590	

With all respect, if you remove the protections on Grizzlies at Yellowstone their numbers will go down due to hunting. And also, 700 bears is not a big number. By right there should be hundreds more.	Factor B	With all respect, if you remove the protections on Grizzlies at Yellowstone their numbers will go down due to hunting. And also, 700 bears is not a big number. By right there should be hundreds more.	FWS-R6-ES-2016-0042-2624	
Furthermore, removing Federal protections will likely result in damaging policies, including trophy hunting, which will put strain on a species already facing a barrage of human-wildlife assaults, including rampant development and encroachment.	Factor B	I strongly oppose delisting the Yellowstone population of grizzly bears. There is enough evidence to suggest such a move is premature and that recovery is incomplete. From inadequate funding to habitat issues, there's a dearth of measures in place to ensure the continued health and recovery of these animals. Furthermore, removing Federal protections will likely result in damaging policies, including trophy hunting, which will put strain on a species already facing a barrage of human-wildlife assaults, including rampant development and encroachment. The delisting of wolves in this region showed us precisely what happens when we allow states and moneyed hunting interests to control the welfare of the wild animals in our public trust. Please do not strip this iconic species of these necessary legal protections.	FWS-R6-ES-2016-0042-2636	

I know black bears are shy, but the high hunting pressure makes them flee all humans. It would be a crime for all future generations of Americans to allow the same thing to happen in Yellowstone.	Factor B	Please do not remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. Yellowstone grizzlies are a special population in a special place. Only there, with all of the protections, can novice wildlife enthusiasts glimpse a view of a grizzly bear in its natural habitat behaving as it might in real life, without fear of humans. I am from Michigan and camp every year in the Upper Peninsula near Seney. According to our State DNR, 15000 - 19000 black bears live in the U.P., or ~1 bear/square mile. That is 5 times more higher the number of grizzlies in Yellowstone (~700 bears/ 3468 sq.miles). Yet, we haven't seen a live bear in 20 years. We see plenty of bear hunters and bear hounds, but, ever since bear hunting became so popular, the only bears we see are dead ones strapped across the hoods of trucks. I know black bears are shy, but the high hunting pressure makes them flee all humans. It would be a crime for all future generations of Americans to allow the same thing to happen in Yellowstone. My only visit to Yellowstone was in 2002 when my family camped there for 10 days. In addition to bison and thermal features, we hoped to see a grizzly bear. And we did! We were fortunate enough to have 3 separate sightings of grizzlies high on a hill and ambling across a meadow. When the bear appeared, everyone and every vehicle stopped. We stood with total strangers, watching for over an hour until the bear moved on and out of sight. That was pure magic which all Americans should be allowed to experience. I read the proposed rule change and understand that hunting would be contingent upon what the states of Idaho, Montana and Wyoming do for management. Plus hunting would be away from areas of the park containing large numbers of visitors. But let's not be naive. Two things that will happen if the grizzly bears lose Federal protection. First, this population of bears has not been hunted in years. That means they do not have the learned survival and cautionary skills of other hunted animals. Grizzly bears are accustomed to being the top predator once they reach adulthood, which will make the Yellowstone bears 'sitting ducks'. Hunters "will" sit at the hunting boundaries waiting for bears to cross the line. A naive group of grizzlies is a trophy hunter's dream. What will stop hunting guides, who work for people like Walter Palmer, from luring trophy bears out of protected areas? Park Rangers won't be able to watch every hunting group. Without Endangered Species protection, a US version of Cecil the Lion "will" happen. Second, after the bears have been hunted for a season or two, they will learn. And they will avoid all humans as best as they can. Those magical sightings that my family was privileged to have will be lost to all future Americans. That would be a terrible crime violating the whole	FWS-R6-ES-2016-0042-2659	
HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing.	Factor B	the Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS. HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. In my opinion, HSUS is again correct. Look at the brutal treatment and killing contests involving wolves in these same three states. It is ugly and awful to be a Montanan who treasures wildlife and yet state governments want to use them for "sport" and as a profit center. FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS says, the agency says it looks forward to hearing from the public about delisting. The truth is, the public has already made it's views known; A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, says delisting is a way to allow the hunting of their sacred relative, the grizzly bear.	FWS-R6-ES-2016-0042-2695	

The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and fish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations."	Factor B	The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS. HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. In my opinion, HSUS is again correct. Look at the brutal treatment and killing contests involving wolves in these same three states. It is ugly and awful to be a Montanan who treasures wildlife and yet state governments want to use them for "sport" and as a profit center. FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS says, the agency says it looks forward to hearing from the public about delisting. The truth is, the public has already made it's views known; A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear.	FWS-R6-ES-2016-0042-2695	
Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Removing protections always increases poaching and illegal means of luring animals to the margins of the protected areas for easy, senseless kills.	Factor B	While their numbers have risen to more than 600 individuals, the bears are geographically isolated, and threats to their habitat and food supplies are daunting. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Removing protections always increases poaching and illegal means of luring animals to the margins of the protected areas for easy, senseless kills. Can't our nation leave the remaining wildlife unmolested, and for the public to enjoy, instead of encouraging blood sports, a relic of barbaric practices?	FWS-R6-ES-2016-0042-2901	

While I appreciate that delisting shows that there has been some success in restoring the grizzly population in the lower 48, the sad fact is that it comes with a license to trophy hunt which is unfair after years of protection, and to a barely sustainable population of animals. It is one thing to hunt elk or deer which thrive in abundance, and which are then consumed but trophy hunting is ultimately about the act of killing an apex predator for bragging rights that it can be done. The meat is not eaten, the body is dismembered or stuffed and becomes a living room ornament on the floor or wall. Of course it can be done with our high powered weaponry to an animal that feeds in the open (just bring out an elk carcass in the right area and grizzlies will appear which is exactly what happened to Cecil the lion).	Factor B	I object to delisting the grizzly bear from the Endangered Species Act. Barring that, the delisting does not need to be accompanied by the legalization of trophy hunting for the following reasons: AS WE SAW WITH SCARFACE, BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. In 2015, record number of Yellowstone area grizzly bears were killed despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. Additionally, there are ranchers right outside of Yellowstone (in MT) who are practicing wildlife sustainable ranching. Rather than give ranchers a license to kill, can't we first ask that they try these methods? The economic impact of grizzlies being road friendly in Yellowstone is huge. Once they start being hunted, they will become less road friendly and there will be fewer visitors to Yellowstone. IF HUNTING IS ALLOWED, THERE MUST BE BUFFER ZONES around national parks and a no-hunt zone in between Yellowstone and Grand Teton National Park, minimally, and up through the Tom Miner Basin area in Montana. CLIMATE CHANGE NEEDS TO BE CONSIDERED. Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated at least one food source. USFWS needs to consider how climate change will impact bears' food sources and behavior. USFWS failed to do this with wolverines and had to have a court order USFWS to consider climate change in wolverine listing. Additionally, we can't say that we are being environmentally responsible and kill off apex predators. The environment does not stop with the flora but is equally impacted by the fauna, particularly apex predators. MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The outcry over the killing of Cecil the Lion by many Americans will be repeated here. We cannot object to the killing of Cecil and then less than a year later sanctify the right of hunters to do the exact same thing in the U.S. STATE CONFLICTS OF INTEREST. The states have not shown that they can work together to manage their apex predator populations, and several officials of the surrounding states have indicated that they wish to eradicate apex predators from their areas. These creatures don't know where state lines begin and end, and some of the most natural habitats for grizzlies are in decidedly unfriendly states. I am disappointed that under a Democratic president that U.S. Fish & Game Wildlife would even consider delisting	FWS-R6-ES-2016-0042-2859	
Hunting will orphan cubs and further decimate the population it took so long to build. Let the future of America's bears be secure.	Factor B	I just listened to Dr. Jane Goodall's message on why she opposes the delisting of grizzly bears. She raises facts that cannot be denied. It took over 40 years to grow their population from 150 to 700 bears. Once delisted in their quest for food because their main food sources are becoming scarcer so in stepping outside the park, they could be shot by a trophy hunter. There is a growing movement among sportsman's to start getting ready for grizzly bear hunting season. Just look at a Wyoming newspaper which sports an article with a pic of trophy hunter standing over a dead grizzly bear, declaring: "WOLF GRIZZ DELIST HUNT!" Hunting will orphan cubs and further decimate the population it took so long to build. Let the future of America's bears be secure. I know this is not the intent of the ESA but once delisted, animals like wolves and bears will be hunted. Do the right thing and keep Grizzly bears listed.	FWS-R6-ES-2016-0042-2924	

I just listened to Dr. Jane Goodall's message on why she opposes the delisting of grizzly bears. She raises facts that cannot be denied. It took over 40 years to grow their population from 150 to 700 bears. Once delisted in their quest for food because their main food sources are becoming scarcer so in stepping outside the park, they could be shot by a trophy hunter.	Factor B	I just listened to Dr. Jane Goodall's message on why she opposes the delisting of grizzly bears. She raises facts that cannot be denied. It took over 40 years to grow their population from 150 to 700 bears. Once delisted in their quest for food because their main food sources are becoming scarcer so in stepping outside the park, they could be shot by a trophy hunter. There is a growing movement among sportsman's to start getting ready for grizzly bear hunting season. Just look at a Wyoming newspaper which sports an article with a pic of trophy hunter standing over a dead grizzly bear, declaring: "WOLF GRIZZ DELIST HUNT!" Hunting will orphan cubs and further decimate the population it took so long to build. Let the future of America's bears be secure. I know this is not the intent of the ESA but once delisted, animals like wolves and bears will be hunted. Do the right thing and keep Grizzly bears listed.	FWS-R6-ES-2016-0042-2924	
First, the bears in this region are finding it increasingly difficult to find decent food resources throughout the year, on account of the effects of climate change, including phenological effects in high-elevation ecosystems, and the alarming growth in the numbers of the mountain pine beetle. Secondly, the genetic diversity of these bears is not great, so the sustainability of the population as a whole is unusually insecure; in light of that, so far from their having to deal with being left with fewer protections, their population should be strengthened by finding increased protections for reliable migration corridors connecting their region to regions to the north where other grizzlies are thriving. Thirdly, the bears' human environment was never good: human neighbors mistrust them at best, or actively go about seeking their removal; hunters covet collecting their body-parts as trophies; and local and state governments lack the political will to protect them, if they're even aware that they need protecting, and are at all sympathetic to that cause.	Factor B	The proposal to remove the Yellowstone population of grizzly bears from status as endangered or threatened should not be recommended. The criteria that the agency have been using to make that recommendation are too narrow, so that the predicament of those bears is not fully appreciated. Three considerations seem to be outstanding. First, the bears in this region are finding it increasingly difficult to find decent food resources throughout the year, on account of the effects of climate change, including phenological effects in high-elevation ecosystems, and the alarming growth in the numbers of the mountain pine beetle. Secondly, the genetic diversity of these bears is not great, so the sustainability of the population as a whole is unusually insecure; in light of that, so far from their having to deal with being left with fewer protections, their population should be strengthened by finding increased protections for reliable migration corridors connecting their region to regions to the north where other grizzlies are thriving. Thirdly, the bears' human environment was never good: human neighbors mistrust them at best, or actively go about seeking their removal; hunters covet collecting their body-parts as trophies; and local and state governments lack the political will to protect them, if they're even aware that they need protecting, and are at all sympathetic to that cause. With regard to that third consideration more generally, it is not clear that the agency take full account of the human environment of wild animals when they assign them a regulatory survival status. It's very fair for us to think of the situation of another species of mistrusted predator in the midst of hostile human neighbors, the re-introduced "Mexican" gray wolves of southern Arizona and New Mexico, a situation that has been poorly regulated and maintained and as a result remains highly insecure, especially because of failures to appreciate the behavior of human beings. Those of us who hope for a strong and resilient population of grizzlies in the Yellowstone region, secure in their home and well-connected to other populations of their kind, dread the thought that they may be left in a predicament not unlike that of the Mexican wolves, with no human friends to help them secure their future, but rather having to rely on the tender mercies of neighbors who neither understand them nor sympathize with them nor even so much as like them.	FWS-R6-ES-2016-0042-2964	

Wyoming and other states attempt consistently to use public sport hunting to manage wildlife - this practice does NOT affect any population in a naturally-selected manner, and due to the small population, increases the likelihood of removing the healthy members of any population. In the case of the grizzly bear, this practice would immediately cause the viable healthy component members to decrease in relation to the whole. NO state should be allowed to manage small predator populations, as the selection is artificial, not relating to heterozygosity, individual health, age, or any other parameter which nature normally selects - it is thus catastrophic in effect. The population, isolated as it is, cannot sustain catastrophic human exploitation. Predators are not selected for human culling, attack, exploitation, and such activity would change the nature of the grizzly in ways most likely deleterious to the species and its trophic niche.	Factor B	1. At present the Yellowstone area Grizzlies do NOT have a robust connection to any larger metapopulation in order to maintain or increase heterozygosity. This means that it is SURE that the small population will slowly trend to homozygosity - inbreeding vulnerabilities. 2. Wyoming and other states attempt consistently to use public sport hunting to manage wildlife - this practice does NOT affect any population in a naturally-selected manner, and due to the small population, increases the likelihood of removing the healthy members of any population. In the case of the grizzly bear, this practice would immediately cause the viable healthy component members to decrease in relation to the whole. NO state should be allowed to manage small predator populations, as the selection is artificial, not relating to heterozygosity, individual health, age, or any other parameter which nature normally selects - it is thus catastrophic in effect. The population, isolated as it is, cannot sustain catastrophic human exploitation. Predators are not selected for human culling, attack, exploitation, and such activity would change the nature of the grizzly in ways most likely deleterious to the species and its trophic niche. 3. Wyoming has counties who already attempt to limit the species, by laws against grizzly in county, EVEN IF THAT AREA IS FEDERAL PUBLIC LAND. This decreases habitat and connectivity, and the act of delisting will cause a sudden change - a diminution - of viable habitat. The plan does NOT take this into account. 4. Yellowstone National Park where the grizzly was concentrated is high plateau, and is increasingly subject to biological effects of global warming - the longer nonfreezing days have caused a whitebark pine die-off, sending the grizzly already from the protected habitat outward to seek other forage. Thus the core population, relatively unknown due to the animal itself, has most likely fallen. The population estimates of Seervheen and others is almost certainly higher than actual numbers. Because of these issues, it will remain premature to delist the grizzly bear UNTIL robust habitat connectivity (with NO human take within those corridors) is created. The Obama administration has consistently attempted to kill off large predators through political corruption in using political deals to get their party into office. The Republican party corruptly attempts to delist endangered species for private and corporate exploitation. These are profoundly unethical reasons for present and past removals and attempts to remove large predators from ESL while they are still at numbers far lower than population modeling well-supported by experiment and consensus, suggest that a proper number of individuals preventing trend to homozygosity, are. Merely because a small group of consumptive wildlife killers desire to kill North American wildlife, is NOT a reason to such delisting, before the population can already be understood to be self-sustaining over 40 or 100 years.	FWS-R6-ES-2016-0042-2990	
Grizzly bears are a slow-to-reproduce species one of the slowest in the animal kingdom. For instance, a mother grizzly bear spends up to four years raising and provisioning her young teaching them how to be bears. It's a huge investment of time, but if their mother gets killed by a trophy hunter, the her cubs will die from starvation or predation.	Factor B	Grizzly bears are a slow-to-reproduce species one of the slowest in the animal kingdom. For instance, a mother grizzly bear spends up to four years raising and provisioning her young teaching them how to be bears. It's a huge investment of time, but if their mother gets killed by a trophy hunter, the her cubs will die from starvation or predation. Yellowstone grizzly bears should not be delisted because if they are, they will be subject to trophy hunting by the states of Wyoming, Montana and Idaho, which have already divided up the percentages of bears that can be hunted. Grizzly bear are a majestic species worth far more alive than dead. They bring tens of millions of dollars to the Northern Rockies states' economies each year. More than 4 million visitors went to Yellowstone and Grand Teton national parks in 2015 alone. Last year, Wyoming realized \$1.1 billion from national park-related revenues. This money helps a lot more people in these states. If someone shoots a grizzly bear, others cannot view or photograph it. Trophy hunters will stuff their dead bears, put their heads over their mantelpieces or turn them into bear skin rugs. That's just wrong. Wildlife belong to us all not just rich trophy hunters. Yellowstone grizzly bears need more protections not less right now, because their major staples, whitebark pine seeds and Yellowstone cutthroat trout, have declined precipitously. Please retain Yellowstone's grizzly bears on the Endangered Species List.	FWS-R6-ES-2016-0042-3002	

Yellowstone grizzly bears should not be delisted because if they are, they will be subject to trophy hunting by the states of Wyoming, Montana and Idaho, which have already divided up the percentages of bears that can be hunted.	Factor B	Grizzly bears are a slow-to-reproduce species one of the slowest in the animal kingdom. For instance, a mother grizzly bear spends up to four years raising and provisioning her young teaching them how to be bears. It's a huge investment of time, but if their mother gets killed by a trophy hunter, the her cubs will die from starvation or predation. Yellowstone grizzly bears should not be delisted because if they are, they will be subject to trophy hunting by the states of Wyoming, Montana and Idaho, which have already divided up the percentages of bears that can be hunted. Grizzly bear are a majestic species worth far more alive than dead. They bring tens of millions of dollars to the Northern Rockies states' economies each year. More than 4 million visitors went to Yellowstone and Grand Teton national parks in 2015 alone. Last year, Wyoming realized \$1.1 billion from national park-related revenues. This money helps a lot more people in these states. If someone shoots a grizzly bear, others cannot view or photograph it. Trophy hunters will stuff their dead bears, put their heads over their mantelpieces or turn them into bear skin rugs. That's just wrong. Wildlife belong to us all not just rich trophy hunters. Yellowstone grizzly bears need more protections not less right now, because their major staples, whitebark pine seeds and Yellowstone cutthroat trout, have declined precipitously. Please retain Yellowstone's grizzly bears on the Endangered Species List.	FWS-R6-ES-2016-0042-3002	
Trophy hunting of the grizzly is not sound management of the species . There should be a three to five year moratorium on even considering hunting as a management tool. A	Factor B	Please do NOT delist the grizzlies. -Trophy hunting of the grizzly is not sound management of the species. There should be a three to five year moratorium on even considering hunting as a management tool. -- GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. -The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. - MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it.	FWS-R6-ES-2016-0042-3011	

This includes changes in land use as a result of the delisting including: hunting, change in land uses, logging, increased accidental and poaching of bears, reduced penalties for illegal kills that could lead to greater bear deaths, reduced breeding due to bear removal, greater stress on the bears that reduces reproduction, killing of sows and related reduction in reproduction and cumulative effects of climate change and increased resource extraction as a result of a decision to delist.	Factor B	Please, do not delist the Greater Yellowstone population of grizzlies from the Endangered Species list. The effects of this decision need to be analyzed for all likely foreseeable direct, indirect and cumulative effects on the species. This includes changes in land use as a result of the delisting including: hunting, change in land uses, logging, increased accidental and poaching of bears, reduced penalties for illegal kills that could lead to greater bear deaths, reduced breeding due to bear removal, greater stress on the bears that reduces reproduction, killing of sows and related reduction in reproduction and cumulative effects of climate change and increased resource extraction as a result of a decision to delist. There needs to be a complete analysis of all effects as a result of the delisting. I urge you to not delist at this time, as there are many effects that need to be evaluated and in the case of climate change it is a likely foreseeable effect that will result in reduced habitat quality and quantity, changes in habitat spatial arrangement that could affect the species and reduced habitat quality due to greater resource extraction in areas that are now critical habitat for bear recovery. I will talk to you in any format, you can call me at 509 6303594 or write me at 200 S. Kent Place East Wenatchee, Wa. 98802. Sincerely Kevin Kane	FWS-R6-ES-2016-0042-3036	
Hunting is not something that should be taken away from us, so we need to share the available prey with them. Having too many top predators would reduce our ability to hunt because there will be smaller populations of prey. To keep the prey, such as elk, at optimal population numbers you would reduce our right rather than reducing the amount of bears. I think this is wrong. Yes we should have predators, but we shouldn't allow them to overpopulate.	Factor B	I support delisting the grizzly bear. As a wildlife biology and management major, I understand the importance of carrying capacity in wildlife. It is important that we manage the bears rather than letting their numbers run loose so that the population doesn't increase too much. Therefore we should be able to determine a reasonable population of bears and hunt them to keep them there. The grizzlies are at the top of the food chain, besides humans, so they aren't going to be in danger from other animals. They are in danger from themselves because if there is too high of a population they will start depleting all of the resources. Hunting is not something that should be taken away from us, so we need to share the available prey with them. Having too many top predators would reduce our ability to hunt because there will be smaller populations of prey. To keep the prey, such as elk, at optimal population numbers you would reduce our right rather than reducing the amount of bears. I think this is wrong. Yes we should have predators, but we shouldn't allow them to overpopulate. Right now, my step father lives in Wapiti, Wyoming, which most people know is on the main route the the east entrance of Yellowstone. Wapiti is highly colonized by people, and grizzlies share that habitat too. In the past several years, grizzlies have become more and more of a problem with the people living here. There are numerous amounts of wilderness lands around Yellowstone that should allow the bears to live comfortably. When bears and humans start having conflicts in developed areas I think we have a problem. I'm not saying bears will never be around humans, but when they are causing problems and government agencies are constantly moving, trapping, or killing bears this should be a red flag. There is a grizzly bear recovery zone set aside just for them. The bears are now well past those boundaries and expanding quickly. There is no reason to say they have not recovered and no longer need protection especially when the population has exceeded the target 500 bear goal by almost double. I grew up hunting, fishing, and camping on horses in the wilderness of Shoshone National Forest, and I have been face to face with grizzly bears. Those who want to protect them should have to go into an elk camp in September in the Thorofare and stay there for the month. After that experience, then I will listen to what they have to say. Every outfitter knows the struggles of the grizzlies in their camps, around their horses, clients, and carcasses. Bear advocates want to group outfitters as bear haters, but if they lived in the outfitter's shoes for a year, they might think differently too. Not to say they are bear haters, it's just another problem to stack onto their extremely high daily load of duties. Simultaneously, every once in a while there is a habituated grizzly bear that causes a problem, charges, or endangers someone's life in the backcountry. These bears should not be given more than one charge, but with	FWS-R6-ES-2016-0042-3160	

I believe that the USFWS failed to comply with executive and secretarial orders that effects on Native American religious or cultural tradition be considered when proposing changes to the ESA, and that the trophy hunts proposed in the state management plans that are necessary for federal delisting would be a violation of the American Indian Religious Freedom Act. The USFWS did not seek input from all of the 31 tribes recognized for historical ties to the GYE when drafting its latest delisting proposal, nor did it consider those tribes unanimous opposition to state management plans that include trophy hunting when they sought out the USFWS. By ignoring these comments and going forward with a delisting proposal contingent on state management plans that include trophy hunting, the USFWS has disrespected these native people and cultures, to say nothing of federal law.	Factor B	I am against the U.S. Fish and Wildlife Service's (USFWS) proposal to remove the Greater Yellowstone Ecosystem's (GYE) population of grizzly bears from U.S. Endangered Species Act (ESA) protection. I believe that the USFWS failed to comply with executive and secretarial orders that effects on Native American religious or cultural tradition be considered when proposing changes to the ESA, and that the trophy hunts proposed in the state management plans that are necessary for federal delisting would be a violation of the American Indian Religious Freedom Act. The USFWS did not seek input from all of the 31 tribes recognized for historical ties to the GYE when drafting its latest delisting proposal, nor did it consider those tribes unanimous opposition to state management plans that include trophy hunting when they sought out the USFWS. By ignoring these comments and going forward with a delisting proposal contingent on state management plans that include trophy hunting, the USFWS has disrespected these native people and cultures, to say nothing of federal law. In the past, we have removed other species from Endangered Species Act protection without the need for a subsequent hunting season. This includes the American bald eagle. In 2007, nobody was calling for a bald eagle hunting season, because shooting a bald eagle would be a disgustingly disrespectful act towards an icon of our country. But for sovereign native nations like the Apsaalooke', the Piegan, the Nee-Me-Poo, and others, the grizzly bear is more than just an icon, it is kin. These people deserve greater respect than to allow sport hunting of their kin. There are many other reasons to be against delisting, but this one is good enough for me.	FWS-R6-ES-2016-0042-5405	
And now this population will be that could be wiped out by trophy hunters and ranchers now. 13 bears a year?	Factor B	Please keep grizzly bears protected under the Endangered Species Act. In 41 years, the grizzly population increased from 150 to 700 bears. That is 13 bears a year. Further, population growth has plateaued in recent years. And now this population will be that could be wiped out by trophy hunters and ranchers now. 13 bears a year? And millions of taxpayer dollars? This, even when a majority of taxpayers - 55% - oppose delisting. Indeed, even more, 68% of Americans oppose hunting. Which begs the question, why will hunting be allowed just because the bears are delisted? When bald eagles were delisted, no hunting was permitted. It does not makes sense to ignore science and public opinion to allow hunting of a species that took decades and millions of dollars to recover (if they are indeed recovered). I therefore oppose delisting of grizzly bears from the Greater Yellowstone Ecosystem. Further, if the bears are delisted, I request that a moratorium on hunting be put in place for at least 5 years and that buffer zones around the parks be established.	FWS-R6-ES-2016-0042-3256	

Trophy hunting could cause disgenic impacts on future population i.e. taking the largest males might negatively impact passing positive positive traits to future grizzly populations.	Factor B	See Attached Attachments Payne Mark	FWS-R6-ES-2016-0042-3270	
Delisting will almost certainly lead to the reopening of sports hunting on grizzlies and the loss of genetic viability. It will hand over management of grizzlies to Montana, Wyoming and Idaho, states with poor to abysmal track records when it comes to defending the welfare of large predators.	Factor B	See Attached Attachments Regele Susan	FWS-R6-ES-2016-0042-3272	

The rate of the bears grew at 13 bears over 41 years. Yet last year 61 bears were killed. 18 of those are still under investigation. In the three years before that there were 44, 50, and 31 dead bears respectively. These numbers do not add up. This is not about the Grizzlies. I do not trust the FWP to manage the bears based on their past history. Idaho puts radio collars on Wolves instead of elk and says it was confused. Do they think we lack a brain? Most species removed from the Endangered Species List are, in fact, NOT hunted. Consider the bald eagle? Delisting is not synonymous with sport hunting.	Factor B	I am against the delisting of Grizzlies. The rate of the bears grew at 13 bears over 41 years. Yet last year 61 bears were killed. 18 of those are still under investigation. In the three years before that there were 44, 50, and 31 dead bears respectively. These numbers do not add up. This is not about the Grizzlies. I do not trust the FWP to manage the bears based on their past history. Idaho puts radio collars on Wolves instead of elk and says it was confused. Do they think we lack a brain? Most species removed from the Endangered Species List are, in fact, NOT hunted. Consider the bald eagle? Delisting is not synonymous with sport hunting.	FWS-R6-ES-2016-0042-3288	
IT IS UNCONSCIONABLE TO DELIST THE GRIZZLIES because lifting the federal protections will allow state-sponsored trophy hunting. USFWS, as Guardians of the Greater Yellowstone Grizzlies, you have a fiduciary responsibility to protect these bears. Please do not betray that trust by delisting them from the Endangered Species Act.	Factor B	This comment is in honor of Bear #399, Queen of the Tetons- I strongly oppose removing the Greater Yellowstone Grizzly bears from the protections afforded under the Endangered Species Act! That such a notion is even being contemplated is shocking. According to the best scientific evidence available, any plan to delist the Grizzlies is unjustified, reckless, and unconscionable. IT IS UNJUSTIFIED TO DELIST THE GRIZZLIES because they are not recovered. While USFWS claims that there are 700 grizzly bears in the Greater Yellowstone Ecosystem, this is a contested figure. Grizzly bears have not recovered across a significant portion of their range and should not be delisted. IT IS RECKLESS TO DELIST THE GRIZZLIES because their survival is precarious, at best, due to continued habitat encroachment, loss of key foods, increased mortality rates and low rate of reproduction. IT IS UNCONSCIONABLE TO DELIST THE GRIZZLIES because lifting the federal protections will allow state-sponsored trophy hunting. USFWS, as Guardians of the Greater Yellowstone Grizzlies, you have a fiduciary responsibility to protect these bears. Please do not betray that trust by delisting them from the Endangered Species Act.	FWS-R6-ES-2016-0042-5441	

We all know it's not sustainable to subject the species to the level of takings the States will permit without federal protection.	Factor B	Please reject the "junk" science. Listen to Jane Goodall et al., and maintain the grizzly bear ESA listing. We all know it's not sustainable to subject the species to the level of takings the States will permit without federal protection. Please save the grizzlies	FWS-R6-ES-2016-0042-3327	
Please do not de-list the grizzlies from the Endangered List. They are barely recovering after their numbers dropped to just over 100 in 1975. Their population is still growing back to a healthy level. Opening them up to trophy hunting will decimate their fragile numbers. Instead, wildlife corridors should be protected to the wilderness north into Canada. Except for the Yellowstone area, they are all but disappeared from the Continental United States.	Factor B	Please do not de-list the grizzlies from the Endangered List. They are barely recovering after their numbers dropped to just over 100 in 1975. Their population is still growing back to a healthy level. Opening them up to trophy hunting will decimate their fragile numbers. Instead, wildlife corridors should be protected to the wilderness north into Canada. Except for the Yellowstone area, they are all but disappeared from the Continental United States. When will the Fish and Wildlife Service view their overseeing of animals as an issue of stewardship and protection of wildlife, rather than just us dumb animals to be managed for hunting? This is all wrong and against nature, humane values, and respect for living sentient creatures.	FWS-R6-ES-2016-0042-3306	

After all I have read I wonderf if the delisting is being done for political, not scientific reasonsof course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that I sternly oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. Å	Factor B	We must immediately stop the U.S. Fish and Wildlife Service (USFWS) from removing the grizzly bear in the Greater Yellowstone EcosystemMontana, Idaho and Wyomingfrom the Federal Lists of Endangered and Threatened Wildlife. They must not delist the Yellowstone grizzly bear.. Critics of the USFWS proposal say that lifting protections for the bear could endanger a growing population, and a lot of the US Public believe that also. The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to an estimated 700 or more today. But grizzly bears have all but disappeared from almost all of the continental United States, except for Yellowstone and Glacier National Park and a few other slivers of habitat, the New York Times reported May 3. After all I have read I wonderf if the delisting is being done for political, not scientific reasonsof course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that I sternly oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. We cannot let humans jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. I also read that the author of the report that led to the delisting proposal, Dr. Christopher Servheen, grizzly bear recovery coordinator, U.S. Fish and Wildlife Service, admits private land development is the greatest threat to the nation's grizzlies, as further development could cut off connectivity among populations and disrupt vital habitat. Please do what is right and scientifically backed and don't delist the grizzly bear because it would be the beginning of the end for them. Thank you for your time and consideration on this very important issue.	FWS-R6-ES-2016-0042-3441	
I think it's too early to legalize bear hunting. I think people are reacting to the change in their businesses (like the dearth of skiing) and bad general economics by demanding new ways to make money. This pressure is going to continue for decades. Commodification of game animals is always a political plus for some people, and an atrocity to other people. It's hard to steer a sensible middle-course and it's scary when the bears are coming to town. But I think it's important to hold the line a while longer until we know more about managing grizzlies than shooting and bear spray.	Factor B	I've hugged a lot of grizzly bears because when they re dead and you re ready to skin them, you can only move them by getting a good grip. I was married to a taxidermist. I know a lot about the economics of the trophy business, the psychology of guys who fly-in to cross the continent to prove their balls. Since we had a museum with a mounted rearing, roaring griz, I know a lot about people who think it is funny to steal the rubber tongue. Since Bob Scriver was also a sculptor who made a portrait of Gentle Ben, I know a little about griz show biz. Quite a lot like politics. When I was out at the trash roll-off this morning (5/7), Shannon came alongside, excited to tell us about the griz hanging around Valler a few miles out. He'd been about fifteen feet away from it and went back to get his wife, who longs to see a griz. The Hutterites on the rez have been complaining about griz in their cows, but the Blackfeet Fish and Game haven't been able to shoot it yet. The idea is to pick out "bad" habituated bears, not trophy bears. And a little accurate shooting might not be a bad thing keep those bears wary. I know very little about Yellowstone grizzlies. I know quite a lot about Glacier Park Grizzlies. When you live in Heart Butte, where I taught on the high east slope of the rez, they teach you to pound on the side of a dumpster before you throw in your trash, so as to spook the bears out first. Often we could see griz going along peacefully on the side of Heart Butte. I used to sneak into the Montana Bear and Wolf meetings of professionals when Jonkel was active. You had to have some kind of a contact to find them, because the general public is so irrational in a dozen different ways, ranging from believing that bears love them the way they love bears, to seeing them as devils in fur that should be eliminated, to wanting a bear rug in their rumpus room to prove their testosterone level until they stub their toe on the bear's open mouth. I helped make a diorama about a grizzly turning over high mountain rocks in order to catch the small mammals that live there. Those small marmots and pikas are already endangered by climate change. The temps are too warm, the snow is too scarce, the seasons are out of synchrony. Bears eat them. Of course, bears eat as much vegetable matter as prey those big claws are garden rakes. The vegetation is also changing. I think it's too early to legalize bear hunting. I think people are reacting to the change in their businesses (like the dearth of skiing) and bad general economics by demanding new ways to make money. This pressure is going to continue for decades. Commodification of game animals is always a political plus for some people, and an atrocity to other people. It's hard to steer a sensible middle-course and it's scary when the bears are coming to town. But I think it's important to hold the line a while longer until we know more about managing grizzlies than shooting and bear spray. It's really more about managing politicians or even Supreme Court justices.	FWS-R6-ES-2016-0042-3495	

There is no scientific reason to hunt Grizzly Bears, they are slow to reproduce and need protection, not targets on their back for the benefit of the constantly declining special interests of trophy hunters.	Factor B	I am opposed to delisting the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal list of endangered species. The decision is premature and does not adequately factor in the decline of their main food sources due to climate change. There is no scientific reason to hunt Grizzly Bears, they are slow to reproduce and need protection, not targets on their back for the benefit of the constantly declining special interests of trophy hunters. Listen to the voices of scientists who have appealed to your poor and biased decision to remove the bears from esa protection. Listen to the comments from the public which are overwhelmingly against delisting Grizzlies. Stop listening to the diminished and shrieking voices of the minority who find pleasure in killing public wildlife for their own sick personal benefit.	FWS-R6-ES-2016-0042-3525	
I oppose delisting because I believe state wildlife agencies will manage the population primarily for the benefit of hunters and to generate additional revenue for the agencies, rather than for the benefit of the ecosystem as a whole. The unofficial, but obvious, primary mission of state agencies has always been to maintain unnaturally high ungulate populations in order to satisfy their hunting constituency. There is no reason to believe that their management of grizzlies towards that end will be any different. It's better to not manage them at all by keeping the listing in place so that nature may take its course to reach an equilibrium.	Factor B	I oppose delisting because I believe state wildlife agencies will manage the population primarily for the benefit of hunters and to generate additional revenue for the agencies, rather than for the benefit of the ecosystem as a whole. The unofficial, but obvious, primary mission of state agencies has always been to maintain unnaturally high ungulate populations in order to satisfy their hunting constituency. There is no reason to believe that their management of grizzlies towards that end will be any different. It's better to not manage them at all by keeping the listing in place so that nature may take its course to reach an equilibrium.	FWS-R6-ES-2016-0042-3587	

It is certain that removing federal protections from the GYE grizzly bear would result in a rush to hunt these bears down. A leaked memo detailing how these three states would divvy up the grizzlies to trophy hunters confirmed this. Opening a hunting season on these bears would not only lower their numbers, it would lower their chances of ever actually recovering.	Factor B	I live in rural New Mexico. I used to live in rural Idaho, Boise, Seattle, and Spokane. I watched the Mahleaur Wildlife Refuge confrontation in Oregon, and was aghast Cliven Bundy de facto expropriated public land by threatening federal agents executing a court order. I have been menaced by people with livestock when lawfully accessing wilderness areas. I am aware of the political pressure imposed on the FWS by special interests who think public lands belong to them or should be open to plunder. This has led to wildlife managers in the states surrounding GYE states who make decisions based on politics instead of science. The New Mexico Department of Game and Fish recently changed a rule to allow steel leg-hold traps against cougars on public land despite overwhelming public opposition and weak conjectural evidence. This is what happened with the delisting of the grey wolf enabling a calamitous and, frankly, nauseating slaughter of these creatures. FWS is proposing to repeat this spectacle by delisting the Grizzly. The ESA process has succeeded in saving the grizzly bear from complete extirpation, but recovery takes time. Of the 50,000 grizzlies that roamed the lower 48 two centuries ago, only about 3% are left, and over half of those bears reside in the GYE - the area in and around Yellowstone and Grand Teton National Parks. Suggesting that a population which has struggled to increase its numbers by even a few hundred over the past 40 years is recovered is not logical. It is certain that removing federal protections from the GYE grizzly bear would result in a rush to hunt these bears down. A leaked memo detailing how these three states would divvy up the grizzlies to trophy hunters confirmed this. Opening a hunting season on these bears would not only lower their numbers, it would lower their chances of ever actually recovering. Climate change, the loss of important food sources, low reproductive rates, and existing human-caused mortality all threaten the survival of this population. Removing healthy individuals from the gene pool and orphaning dependent cubs, compounded with the stress on surviving bears caused by the need to constantly run for their lives, will have untold consequences. I am sick and tired of land, water, air, timber, and wildlife that is the heritage of all Americans managed as though it belongs to a privileged few. I know millions of Americans share my view. I hope FWS takes the scientifically correct and morally defensible position of continuing to protect what is left of this species. James Atkinson, PhD	FWS-R6-ES-2016-0042-3548	
National Parks belong to everyone, just as the grizzly bears belong to everyone within those parks, not to someone who pays to kill it. I want to be able to enjoy the bears. Ask someone how many were killed this past year without a hunting season. It's pretty sickening, and that doesn't include, the shoot, shovel and shut up bear deaths either. Economically, the live, protected grizzly bears bring in many more dollars,(tourists,) than the grizzly hunting season will ever bring.	Factor B	National Parks belong to everyone, just as the grizzly bears belong to everyone within those parks, not to someone who pays to kill it. I want to be able to enjoy the bears. Ask someone how many were killed this past year without a hunting season. It's pretty sickening, and that doesn't include, the shoot, shovel and shut up bear deaths either. Economically, the live, protected grizzly bears bring in many more dollars,(tourists,) than the grizzly hunting season will ever bring. The current population of Grizzlies is not recovered by any means. Follow the science man! Why is this even being considered? Look what happened to the wolves a few years ago, doesn't that show you people anything? A bear or a wolf doesn't know where a National Park property line is. For Pete sakes people wake up!	FWS-R6-ES-2016-0042-3617	

The population may be doing well now, however if removed from the list, hunting would quickly place them back on the list. It could also tip the scale in favor of this species ending up being lost forever. This is a small population, genetically isolated.	Factor B	Please do not remove the Grizzly from the protected species list. The population may be doing well now, however if removed from the list, hunting would quickly place them back on the list. It could also tip the scale in favor of this species ending up being lost forever. This is a small population, genetically isolated. These two facts favor an outcome that is poor if hunting is allowed.	FWS-R6-ES-2016-0042-3858	
Trophy hunting is wasteful and immoral on every level possible to be understood by any person with decent character and a respect for life. Unfortunately, there are people who do not respect other life forms aside from human (if that), and get a thrill from killing animals such as bears, lions, hippos, giraffes, etc.	Factor B	Trophy hunting is wasteful and immoral on every level possible to be understood by any person with decent character and a respect for life. Unfortunately, there are people who do not respect other life forms aside from human (if that), and get a thrill from killing animals such as bears, lions, hippos, giraffes, etc. Wow! Hunting! wtg, @ me for explaining something that everyone reading this comment already very well knew!!! It sounds redundant, doesn't it? Well guess what? IT IS. IT IS 2016, WHY ARE WE STILL HAVING TO TRY TO CONVINCE PEOPLE NOT TO KILL ANIMALS FOR FUN?!?!?! No, I am not vegan or vegetarian, I just don't believe in hunting as a sport UNLESS you are using EVERY part of the animal. And using it for good cause, not luxury. If you're going to kill a bear, properly use its meat to feed those who can't afford to feed their families. Use its skin to warm those who do not have an adequate amount of blankets to use in the winter. Don't kill animals to make a fur coat for some rich person to wear to feel fancy. Don't kill an animal to make a rug. Don't kill an animal to mount its head on your wall. Kill animals not commonly eaten when it is NECESSARY, not when you are bored. Jeez, why do some people need to be told that?? And even if someone is repeatedly told not to do something, if they are stubborn, they will find a way. So at least make sure those people who cannot follow very simple rules are appropriately punished by keeping the grizzly bear on the Federal List of Endangered and Threatened Wildlife. Just because the population has increased over the past few years does not mean it will remain that high once the ban is lifted. It is common sense. Do what is right for the animals. Do what is right for the earth. Be a respectable human being and do not kill animals for sport. Just don't do it.	FWS-R6-ES-2016-0042-3865	

Just how do you count Grizzly bears? I don't think you can get an accurate count! Their food is vanishing, with the loss of Cutthroat trout and loss of the Whitebark pines. The loss of these bears by hunters, claiming an encounter.	Factor B	It is with a hopeful heart that you will read this letter from the first line to the last, and try to understand how important it is that our Grizzly bears are not de-listed. That the ESA stay in tact, and that individual states should not have control over our wildlife and public lands. This land belongs to you and I, and it is a gift to "ALL" American citizens! Not just hunters and cattleman who have their lobbyists. These bears are the true meaning of our wild America. They are true icons, ambassadors of the west, and they bring millions of visitors, and millions of visitor dollars to the economy of our western states. Just how do you count Grizzly bears? I don't think you can get an accurate count! Their food is vanishing, with the loss of Cutthroat trout and loss of the Whitebark pines. The loss of these bears by hunters, claiming an encounter. Extinction happens much faster than recovery. So please, think very carefully before you sign on the dotted line. I'd vote NO to delisting Grizzly's. I want my family for generations to come, to be able to visit our beautiful western states, and be able to see a wild Grizzly bears. "My Story" My husband had promised to take me on vacation to Yellowstone National Park for 30 years. A place I always wanted to visit, because of my love for wildlife and photography. Well, he made good on his promise, for my 60th birthday 8 years ago. My goal was to see a "Wild" grizzly bear. We had 10 days to accomplish this and rose every morning at 5am, to be out early. I was so full of excitement and anticipation. But, as the days slipped by (now on day 5) with not a single sighting, I asked if we could spend a couple of days in the Tetons. So off we headed. It took 2 more days, and then it happened! On day eight, our last day in the Tetons I saw my first grizzly bear. Not just any grizzly, but Grizzly # 399! As everybody learns quit quickly, when you see a car pulled over on the side of the road, it usually means something special has been spotted. We asked what this couple in the car saw, as we couldn't see anything in the tall grass. Then she appeared. What a majestic animal! We watched her (she was totally ignoring the huge crowd that had gathered) for an hour digging up grubs and stopping to sniff the cool fall air. It was an amazing glimpse into her wild world. I have been back to Greater Yellowstone two more times. Scrimped and saved every penny I could! The second trip, I did not get to see any bears. My last trip cost \$14,000.00. for only 9 days. Just to see Grizzly bears. Only one day out of that 9, was I lucky enough, with the help of a guide, to see another Grizzly. You aren't guaranteed a sighting. So, if I'm not seeing bears, I think, there really aren't as many as you think out there. Don't you want your families to see Grizzly bears for generations to come? Not just a trophy on somebody's wall or floor. Remember: EXTINCTION IS FOREVER Patricia Greig	FWS-R6-ES-2016-0042-3585	
I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters.	Factor B	I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters. Yellowstone was almost destroyed with this insane and uneducated war on wolves and now (do we learn nothing??) the same is happening with the Grizzly Bears. It is mind boggling. Please consider that: Everything in your power should be done to protect this amazing mammal. FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Declining food sources pose a threat to Grizzlies and this delisting will be devastating to the Grizzly's chance of survival.. Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Another natural curb in their number. Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains Grizzlies occupy only 1% of their historic range. AND PLEASE TAKE NOTE: Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years, caused by ignorant planning by humans, by the way.. Hoping for some forward thinking and moral courage here! Thank you Anne K	FWS-R6-ES-2016-0042-3905	

Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains	Factor B	I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters. Yellowstone was almost destroyed with this insane and uneducated war on wolves and now (do we learn nothing??) the same is happening with the Grizzly Bears. It is mind boggling. Please consider that: Everything in your power should be done to protect this amazing mammal. FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Declining food sources pose a threat to Grizzlies and this delisting will be devastating to the Grizzly's chance of survival.. Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Another natural curb in their number. Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains Grizzlies occupy only 1% of their historic range. AND PLEASE TAKE NOTE: Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years, caused by ignorant planning by humans, by the way.. Hoping for some forward thinking and moral courage here! Thank you Anne K	FWS-R6-ES-2016-0042-3905	
Basically, those wanting to hunt Grizzlies are just looking for their next fix to make themselves feel powerful. Why would anyone delist an animal just for Trophy hunting?	Factor B	I'll keep this short and sweet...there is no logical reason to remove Grizzly bears from the endangered species list. At this point, the population is still small enough that they could easily become endangered or extinct if hunting them occurs and any other detrimental environmental effects occur. Basically, those wanting to hunt Grizzlies are just looking for their next fix to make themselves feel powerful. Why would anyone delist an animal just for Trophy hunting? There is no benefit to the bears, the ecosystem, or the hunters.	FWS-R6-ES-2016-0042-4072	

The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans.	Factor B	No one really knows how many grizzlies are in the GYE. The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foods, are a threat to the grizzly's long term survival. The bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine which is a critically important food source." Climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which	FWS-R6-ES-2016-0042-4226	
Montana has released its management plan and is proposing a spring hunting season to run between March 15 and April 20. Yet we have already seen grizzly sows with cubs in Yellowstone National Park as early as April 16th. With warming temperatures in the future, emergence could occur even earlier than that. This means grizzly sows with new cubs could be killed and these tiny helpless bears left motherless.	Factor B	I am asking you to NOT delist grizzly bears in the Greater Yellowstone Ecosystem. The USFWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. However, David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. In reality, no one really knows how many grizzlies are in the GYE. Furthermore, population growth has stagnated since the early 2000's, and the Yellowstone grizzly population declined by 59 bears in 2015 alone. The USFWS also claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide. Therefore, the grizzly bear cannot be delisted in just the GYE. By USFWS own estimates, around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Furthermore, Yellowstone's Grizzly population has no connectivity with outside populations, and has not for the last 100 years. This means that today's population came from a gene pool of only 136 animals (the population low point in 1975. This lack of genetic diversity threatens the Yellowstone grizzly's survival in the long term. USFWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. Whitebark pine nuts have long been considered to be the single most important food source for grizzlies. In the last 20 years, whitebark pines have been decimated by both blister rust and pine beetles. The pine beetle epidemic has been linked to climate change. According to Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council, "Yellowstone grizzly bears are likely declining in the wake of the loss of whitebark pine, a critically important food source." USFWS claims that Montana, Idaho, and Wyoming will successfully use hunting to manage the recovered grizzly bear population.If GYE grizzly bears are delisted, the three states have already signaled that they will open up trophy hunting seasons for the bears. Wyoming holds the vast majority of grizzlies. I do not believe that Wyoming can be considered capable of maintaining populations of any large carnivore in a scientific manner, considering its dismal record of "managing" wolf populations. Its wolf management is so bad that it has had to be struck down in federal court twice. Only now that the wolf has been relisted in Wyoming are we finally seeing wolves again in Grand Teton National Park, which will	FWS-R6-ES-2016-0042-4260	

Trophy hunting will take prime grizzlies from their latest offspring causing a devastating effect on future generations.	Factor B	Do not delist Grizzly Bears. 1. The proposed rule does not address protecting grizzly habit outside the conservation area when in fact more than half spend their time in this area. 2. Proposal does not reflect that there is a direct correlation between loss of pine bark as a food source and that bears will not find another alternative. 3. Proposal does address the far reaching effects of climate change on the bear's denning habits. 4. Trophy hunting will take prime grizzlies from their latest offspring causing a devastating effect on future generations. 5. Proposal did not address the problem of genetic isolation if grizzlies are not allowed to roam outside of the conservation area.	FWS-R6-ES-2016-0042-4363	
YET THE REALITY IS: x A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium.	Factor B	I would like to enter the following comments about the proposed delisting of the Yellowstone Grizzly: YOUR CLAIM IS THAT there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. YET IN REALITY: no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." YOUR CLAIM IS THAT the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foods is not a threat to the grizzly's long term survival. YET THE REALITY IS: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. YOUR CLAIM IS THAT your agency will stay involved with protecting the grizzly population after delisting. YET THE REALITY IS: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. YOUR CLAIM IS THAT: Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. YET THE REALITY IS THAT: This approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. ===== SPECIAL OBJECTIONS!!! ===== YOUR CLAIM IS THAT: your agency looks forward to hearing from the public about delisting. YET THE REALITY IS: A recent national poll on behalf of the Humane Society of	FWS-R6-ES-2016-0042-4382	

The Service needs to strengthen habitat protections and mortality limits in the proposed rule.	Factor B	Docket No. FWS-R6-ES-2016-0042 RE: Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. The historic comeback of the Yellowstone grizzly bear population is truly a remarkable achievement. But the current proposal threatens progress made to date. The Service is rushing to delist the grizzly bear before it knows how the Northern Rockies states and other federal agencies plan to manage it. It is unacceptable to proceed with delisting when the state and federal plans governing how this population will be managed are incomplete and therefore, unenforceable. Further, the Service's current proposal doesn't provide grizzlies with enough protections to ensure their long-term recovery. We can't afford to be careless with this species. There is no need to rush this process, but that's exactly what the Service appears to be doing. I call on the Service to put the proposed delisting rule on hold for the following reasons: 1) The Service needs to strengthen habitat protections and mortality limits in the proposed rule. 2) State and federal management plans detailing how this population will be managed are incomplete and must be updated to provide enforceable protections. 3) The Service must rectify inconsistencies that currently exist in the set of documents (the proposed rule, the recovery plan, and the conservation strategy) detailing how this population will be managed post-delisting. The Service continues to work with the state and federal agencies involved, it must prioritize the following: -Strong protections for the core population and habitat. -Restored connectivity with other grizzly bear populations by protecting bears in areas important to connectivity, allowing the population to continue to expand and securing habitat on public lands in between populations. -Continued and enhanced efforts to minimize conflicts between grizzly bears and people, thereby improving social tolerance and public acceptance for the bears throughout their range. -Adequate funding to support ongoing grizzly bear recovery. Idaho, Montana and Wyoming's state grizzly bear management plans must be revised to provide "adequate regulatory mechanisms" to conserve the species - a requirement of the Endangered Species Act. Wyoming has yet to finalize a revised grizzly bear state management plan, and the draft is not in line with important details of the Service's delisting proposal. Idaho and Montana have not yet set a public timeline for revising or allowing public review of revisions to their grizzly bear management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the "adequate regulatory mechanisms" they need. In addition, the Forest Service should allow for public review of any changes to the 2006 forest plan amendments. Currently the timeline for	FWS-R6-ES-2016-0042-5524	
These magnificent animals are a top predator along with our wolves and need to remain protected particularly in the area of Yellowstone where due to no hunting they have become a very healthy successful population. There are not many places left where our top predators are afforded this well established safe and free life.	Factor B	I am writing with great concern over the delisting of Grizzly Bears from Yellowstone. These magnificent animals are a top predator along with our wolves and need to remain protected particularly in the area of Yellowstone where due to no hunting they have become a very healthy successful population. There are not many places left where our top predators are afforded this well established safe and free life. These animals are very important to the land and a healthy ecosystem which we must work very hard to not destroy. This bill that gives states the right to kill our wildlife without the public having no say in over turning the ruling is just plain a major injustice. Our numbers are far greater than those supporting such actions which are ranchers and hunters. Yellowstone brings in a very large amount of tourism dollars in the name of viewing wildlife and for many it is a yearly venture. Some of our most iconic and historic species live in Yellowstone and they must be preserved before all they become is a story of the past. With our climate changing we are going to see many changes to the way our wildlife survives and they do not need massive human intervention added to this fate. Seems our wildlife including Grizzly Bears are stuck in a political tug of war and this needs to stop! Our wildlife and their habitat is not about greed it is about science...pure and simple. We owe it to our future generations to preserve the majestic wildlife and the limited lands they have left before it is too late. We have spent far too much money to reintroduce, list and protect species such as Grizzlies to spend more money killing them. Plain and simple it is just wrong! We need agencies that are knowledgeable about our wildlife and their benefits to the planet and not ones that bow to special interest and offer no protections. I have always wanted to visit Yellowstone but if the killing continues as I have with Idaho I will be avoiding Montana & Wyoming as well. I simply cannot support these practices!	FWS-R6-ES-2016-0042-0013	

The Grizzly is long overdue for delisting. It is crucial that Grizzlies re-learn to fear man, to minimize man-bear contact, and limited hunting will accomplish this. Bear populations are also outgrowing habitat, and conflicting with wolves and other large predators. The Grizzly has been left on the ESL far too long, under the illusion of protection, but the result is actually hurting the overall health of Griz populations.	Factor B	The Grizzly is long overdue for delisting. It is crucial that Grizzlies re-learn to fear man, to minimize man-bear contact, and limited hunting will accomplish this. Bear populations are also outgrowing habitat, and conflicting with wolves and other large predators. The Grizzly has been left on the ESL far too long, under the illusion of protection, but the result is actually hurting the overall health of Griz populations.	FWS-R6-ES-2016-0042-0072	
While on the subject of cub survival I would also like to point out that if regulated hunting was established in any portion of the ecosystem it also has the potential of benefiting overall cub survival rates as well by reducing the number of mature boars which are known to kill cubs given the opportunity, in addition to helping restore a healthy fear of humans in all the bears. In reality state regulated hunting would provide funds for conservation efforts and create a better public perception of the bears as well as state and federal management agencies within the communities directly affected.	Factor B	I fully support removing the greater Yellowstone ecosystem population of grizzly bears from the list for both practical reasons of coexisting with bears and from a biological standpoint. Without going in to regurgitating data to support my statement I will just say I know that the professional biologists from USFWS would not make such a proposal if there were not sufficient evidence to warrant doing so. I also know that the states involved are fully capable of managing the bears without risk of taking a step backward in terms of maintaining a viable population in the Yellowstone ecosystem or achieving recovery in other ecosystems. As far as concerns about the bears becoming genetically isolated first of all I would point out that a slight reduction of bears (if there even is) within the Yellowstone ecosystem is not going to have any affect. I would think genetic diversity within the Yellowstone ecosystem relies on transient animals from other ecosystems arriving in the Yellowstone ecosystem, keeping in mind that these transient animals will still be fully protected until their arrival I believe the delisting would have almost no affect in this regard. Having lived in close proximity to grizzlies from other ecosystems all my life I find it abundantly evident that they are recovering and dispersing and have no doubts genetic diversity is not in any danger from the proposed rule, if anything perhaps a slight reduction in the Yellowstone population may be beneficial in this regard as it would make room for transient animals to establish territories and eventually interbreed with the existing population. Knowing many people who live and recreate in the Yellowstone ecosystem I am shocked at how many tell me about frequent encounters with these bears. I am convinced the reason that the bears so commonly show little or no fear of humans is that management policies have prohibited people from engaging in activities which discourage bears from interaction with humans, including defense of life and property in all but the most dire of circumstances. Bears are very capable of learning from their experiences and I believe their behavior will change in a positive way resulting in less conflict if the proposed rule is adapted, this will be good for the bears in the long term, if sows teach their young to avoid humans rather than being indifferent to them, or worse yet seeking them out, more cubs will survive. While on the subject of cub survival I would also like to point out that if regulated hunting was established in any portion of the ecosystem it also has the potential of benefiting overall cub survival rates as well by reducing the number of mature boars which are known to kill cubs given the opportunity, in addition to helping restore a healthy fear of humans in all the bears. In reality state regulated hunting would provide funds for conservation efforts and create a better public perception of the bears as well as state and federal management agencies within the communities directly affected.	FWS-R6-ES-2016-0042-0075	

Once a quota of sow grizzlies has been reached, all grizzly hunting should be ended for the season. The goal should be to carefully manage the population while ensuring slow, steady growth in the number of bears. Relocation should also be considered as a management tool before opting for hunting.	Factor B	I've bow hunted in grizzly country in Idaho outside of Yellowstone Park for several years. While we have found tracks, scat and, one one occasion, had a bear come between me and an elk, I've never found grizzly numbers to be so significant that they have posed a real risk. If there is to be a hunting season, it should be very carefully monitored, with limited, controlled hunt tags and mandatory reporting by all hunters who participate. Once a quota of sow grizzlies has been reached, all grizzly hunting should be ended for the season. The goal should be to carefully manage the population while ensuring slow, steady growth in the number of bears. Relocation should also be considered as a management tool before opting for hunting.	FWS-R6-ES-2016-0042-0124	
I've bow hunted in grizzly country in Idaho outside of Yellowstone Park for several years. While we have found tracks, scat and, one one occasion, had a bear come between me and an elk, I've never found grizzly numbers to be so significant that they have posed a real risk. If there is to be a hunting season, it should be very carefully monitored, with limited, controlled hunt tags and mandatory reporting by all hunters who participate.	Factor B	I've bow hunted in grizzly country in Idaho outside of Yellowstone Park for several years. While we have found tracks, scat and, one one occasion, had a bear come between me and an elk, I've never found grizzly numbers to be so significant that they have posed a real risk. If there is to be a hunting season, it should be very carefully monitored, with limited, controlled hunt tags and mandatory reporting by all hunters who participate. Once a quota of sow grizzlies has been reached, all grizzly hunting should be ended for the season. The goal should be to carefully manage the population while ensuring slow, steady growth in the number of bears. Relocation should also be considered as a management tool before opting for hunting.	FWS-R6-ES-2016-0042-0124	

Additionally, management by the states is now needed as bears are becoming more and more bold as they have an UNNATURAL lack of fear/respect for humans.	Factor B	I support delisting grizzly bears in the GYE. Let the biologists do their job and take the emotional nonsense out of this quagmire. The scientists have said the populations are stable/recovered. Additionally, management by the states is now needed as bears are becoming more and more bold as they have an UNNATURAL lack of fear/respect for humans.	FWS-R6-ES-2016-0042-0145	
Hunting would also be a very useful tool that could be used when a problem bear needs to be dealt with instead of paying biologists or others thousands of dollars to deal with a problem animal.	Factor B	It is time that we allow very limited permit hunting of these majestic animals. Their populations warrant it and I believe that the professional wildlife biologists and the folks that know and study these great animals know a heck of a lot more than the average person. They all feel that it is time to help control the populations of these animals. The states in conjunction with working with biologists should be the ones who set the numbers of animals that can or will be taken. Hunting would also be a very useful tool that could be used when a problem bear needs to be dealt with instead of paying biologists or others thousands of dollars to deal with a problem animal. If populations drop and don't hold steady at a sustainable level then hunting would stop in that area until they again were at good healthy levels. Each area where the bears would be hunted, and each state needs to closely monitor the populations and respond accordingly. I have talked to many outfitters over the years about grizzly bears and hunting them. Each person who has had a lot of experience in an area with good grizzly bear populations has said that hunting these animals also helps to keep them wild. They find that they have less problems with the bears being bad in locations where they are hunted. I completely support limited permit hunting and sportsman and women should be proud of the fact that our dollars and the work by groups such as Game & Fish Departments, Safari Club International, Rocky Mountain Elk Foundation, and the Boone & Crockett Club have worked hard to help keep Grizzly Bears for all of us to enjoy and see. It is sportsman's dollars and visions that is the largest contributor to the success of bringing these great bear populations back to where they are today.	FWS-R6-ES-2016-0042-0179	

Please do not take the Grizzly Bear off the endangered species list. They once roamed all over America and are magnificent animals. I am and have been a wildlife guide in Yellowstone since 2004. Over the course of the summer I may see 3 - 5 grizzly bears on my tours, if that many. 3 million people come to Yellowstone to see the bears and I am grateful they will still be protected in the National Parks. My concern are hunters and I do not want hunters to shoot bears, go bear hunting, trophy hunting in the national forests while I am hiking . Also, bear bating is dangerous and very hard to tell a bear's sex in the spring when she has her cubs... and , a grizzly cub stays with his mother for 2 seasons. And, above all. I work at a wildlife sanctuary where we take care of 5 bears, 4 of them are grizzly bears. I really love these animals and their intelligence, gentleness, patience and they deserve to live where they have always lived and not be hunted by dangerous trophy hunters who could take the life of a mother with sub-adult cubs . Thank you for keeping them protected everywhere, it is the right thing to do for them.	Factor B	Please do not take the Grizzly Bear off the endangered species list. They once roamed all over America and are magnificent animals. I am and have been a wildlife guide in Yellowstone since 2004. Over the course of the summer I may see 3 - 5 grizzly bears on my tours, if that many. 3 million people come to Yellowstone to see the bears and I am grateful they will still be protected in the National Parks. My concern are hunters and I do not want hunters to shoot bears, go bear hunting, trophy hunting in the national forests while I am hiking . Also, bear bating is dangerous and very hard to tell a bear's sex in the spring when she has her cubs... and , a grizzly cub stays with his mother for 2 seasons. And, above all. I work at a wildlife sanctuary where we take care of 5 bears, 4 of them are grizzly bears. I really love these animals and their intelligence, gentleness, patience and they deserve to live where they have always lived and not be hunted by dangerous trophy hunters who could take the life of a mother with sub-adult cubs . Thank you for keeping them protected everywhere, it is the right thing to do for them.	FWS-R6-ES-2016-0042-0196	
I have talked to many outfitters over the years about grizzly bears and hunting them. Each person who has had a lot of experience in an area with good grizzly bear populations has said that hunting these animals also helps to keep them wild. They find that they have less problems with the bears being bad in locations where they are hunted.	Factor B	It is time that we allow very limited permit hunting of these majestic animals. Their populations warrant it and I believe that the professional wildlife biologists and the folks that know and study these great animals know a heck of a lot more than the average person. They all feel that it is time to help control the populations of these animals. The states in conjunction with working with biologists should be the ones who set the numbers of animals that can or will be taken. Hunting would also be a very useful tool that could be used when a problem bear needs to be dealt with instead of paying biologists or others thousands of dollars to deal with a problem animal. If populations drop and don't hold steady at a sustainable level then hunting would stop in that area until they again were at good healthy levels. Each area where the bears would be hunted, and each state needs to closely monitor the populations and respond accordingly. I have talked to many outfitters over the years about grizzly bears and hunting them. Each person who has had a lot of experience in an area with good grizzly bear populations has said that hunting these animals also helps to keep them wild. They find that they have less problems with the bears being bad in locations where they are hunted. I completely support limited permit hunting and sportsman and women should be proud of the fact that our dollars and the work by groups such as Game & Fish Departments, Safari Club International, Rocky Mountain Elk Foundation, and the Boone & Crockett Club have worked hard to help keep Grizzly Bears for all of us to enjoy and see. It is sportsman's dollars and visions that is the largest contributor to the success of bringing these great bear populations back to where they are today.	FWS-R6-ES-2016-0042-0179	

The killing of female grizzlies will hamper the continuance of the species as they do not have cubs every year and there will be no way to sustain their numbers.	Factor B	Please do not delist the grizzly. Their total population has not been recovered sufficiently and I am very concerned that with the delisting, hunting will began immediately. Once that would happen, there will be no way to keep the number of grizzlies at a good recovery level. The killing of female grizzlies will hamper the continuance of the species as they do not have cubs every year and there will be no way to sustain their numbers. Trophy hunting of the grizzly by the states is not management of an apex predator that is essential to the sustainment of healthy eco- systems. UFWS needs to stop catering to the desires of special interests and needs to manage and protect these iconic beings. Ranchers and Hunters only reflect a minority in this country. The majority of citizens do not want the Grizzly delisted. It seems government agencies have forgotten that the consumption of beef and other domestic livestock is of choice, not necessary to maintain a healthy diet. Domestic livestock like cattle and sheep are not essential to one's daily diet. Protein can be found in various other food sources and the sooner that is realized, the sooner this obsession to protect the product of a private industry just might stop. The Grizzly like other predators is necessary and should be allowed to coexist with our species. We humans are not gods and we need to stop acting like such and not dictate what beings live or die. DO NOT DELIST THE GRIZZLY. THEY ARE NOT FULLY RECOVERED AND LOOKING AT THE WYOMING STATE MANAGEMENT PLAN IT RESTRICTS THEIR DISPERSEMENT AND REALLY DOES NOT GIVE THEM SUFFICIENT ROOM TO SURVIVE IN. NOT A GOOD PLAN. OVERSIGHT OF THE GRIZZLY NEEDS TO BE KEPT AT THE FEDERAL LEVEL.	FWS-R6-ES-2016-0042-0209	
Based on current grizzly populations and the extremely high incidence of conflict with humans in the Island Park area and elsewhere, it would be irressonsible to not start big game management of these animals. Controlled hunting has been shown to be the most effective way to manage wildlife populations and it would instill a natural fear of humans in these predators that is missing to some extent now.	Factor B	Based on current grizzly populations and the extremely high incidence of conflict with humans in the Island Park area and elsewhere, it would be irressonsible to not start big game management of these animals. Controlled hunting has been shown to be the most effective way to manage wildlife populations and it would instill a natural fear of humans in these predators that is missing to some extent now. I highly encourage delisting of the grizzly bear as soon as possible.	FWS-R6-ES-2016-0042-0221	

Lastly, another consequence of delisting the brown bear is that they will once again be hunted. States surrounding Yellowstone have already announced the bear will once again be hunted. Hunting the bear is exactly what caused the Yellowstone Bear to need FESP in the 1st place. While most people would rather take a photograph of a bear as opposed to shooting it, trophy hunting brown bears translates to state hunting license revenues. Grizzly Bear hunts will negatively impact this un-recovered species.	Factor B	To Secretary of the Interior Ms. Sally Jewell, I am writing to you about the issue of the U.S. Fish and Game Department's decision to remove the Yellowstone Grizzly Bear aka Brown Bear off the Federal Endangered Species Protection list. This is a complex issue as are the consequences of this amazing animal losing their endangered protection. The final answer as to why the Yellowstone Grizzly should not be removed is clearly because the species is not recovered. Instead of delisting, with all the time, money, and effort spent to bring back the bear from extinction, more money and time needs to be spent educating the growing human population on living in bear territory. Currently, the #1 cause of bear mortality still stems from conflicts with people. A secondary unforeseen problem that has reared its ugly head in recent years is the misinformation campaign of certain US agencies as well as one sided mainstream media stories. For example, government agencies and U.S. newspaper articles have claimed that the Yellowstone Bear population has increased and even doubled since the last time the US Fish and Game tried to remove the bear in 2006. In dissent of this opinion, a recent annual report compiled by Dr. David Mattson from the Interagency Grizzly Bear Study Team concludes that the Yellowstone Grizzly population has not only not grown since 2002, it has actually declined since 2007. This effort to misinform the public is both disturbing and problematic because the American people are not getting the truth. Let it be known that I wish to only focus on a few important points in this letter as opposed to the many reasons as to why delisting the Yellowstone Bear is the wrong move at this time. Female bears if healthy only have litters about every 3 years and do not reproduce easily. The Yellowstone Bear population has been isolated for over 100 years and some evidence suggests that the population is suffering from the effects of inbreeding. The Brown Bear currently occupies about 1% of their historic range prior to Europeans settling the United States. While there is available habitat suitable for Brown Bears that could be used to connect the few remaining populations in the lower 48 states, the current plan calls for flying or driving male brown bears to Yellowstone in order to mate and improve their genetic diversity. Again, this is a wrong-headed move unless given no other choice to sustain a healthy population. Currently, ranchers and farmers are compensated for the loss of domesticated animals by Yellowstone Bears. While some ranchers are working out their differences peaceably with grizzly bears, others are not. For that reason, federal oversight is still necessary. The issue of climate change as it relates to the loss of the bear's food sources must also be addressed. U.S. Fish and Wildlife Service has claimed that it's OK to delist the Grizzly now, even though it has lost 2 of their 4 major food sources because of climate change and invasive	FWS-R6-ES-2016-0042-0008	
Please keep Grizzly Bears on the endangered list as long as there remains a question about the long-term prospects of these iconic Western creatures. That the grizzly population is heavy on older bears while young bears are not surviving to adulthood (Bonnie Rice, Sierra Club) is evidence of a troubling trend. Perhaps states could be given authority to deal with individual problem animals, but to delist and open grizzlies for state hunting licenses is not warranted.	Factor B	See Attached Attachments James Darcy	FWS-R6-ES-2016-0042-0002	

My conclusion that there is on biological evidence to support the belief that they should be delisted. Here's why: 1) They need biological diversity. With hunting, they will be unable to reach other grizzly bear populations. 2) Some of their primary food sources are in decline due to global warming. This is an indisputable fact. 3) They have the lowest reproduction rate of any North American animal. If hunted, their numbers could be driven down past the point of recovery, because there is no reliable way to count them, especially by gender. Sows will be killed and cubs left to starve or be killed by predators or hunters. 4) They are an important factor in the Yellowstone ecosystem. To remove any of them would be a disservice! Additionally, grizzly bears bring thousands, if not millions, of people to Yellowstone each year. There is no reason why we can't live with the grizzly bears. People need to be responsible, so bears don't have to be killed or removed from the Greater Yellowstone Ecosystem. Over 50 were removed in 2015, mostly due to human negligence, even with protection. Without protection it would be a fiasco. Greed and the desire to mount a grizzly bear head on the wall is what I believe, is driving this decision to delist them. It has nothing to do with conservation. Turning the fate of the grizzly bear over to anti-carnivore states would be a disaster that could result in the demise of the grizzly bear. Many of these bears, especially sows with cubs have grown accustomed to humans and would be easy targets for hunters. Allowing hunting in areas close to Yellowstone and Grand Teton parks would be a complete disaster and some of the states are even talking about allowing that. Some hunters are already targeting particular bears as soon as they are delisted. Please withdraw your request to delist the grizzly bears. These bears are an important part of the ecosystem and are loved by people who come to visit the area. We live in Montana and I know we can find a way to live with the grizzlies. We don't need to kill them.	Factor B	I have read numerous opinions on the subject of delisting the grizzly bears. My conclusion that there is on biological evidence to support the belief that they should be delisted. Here's why: 1) They need biological diversity. With hunting, they will be unable to reach other grizzly bear populations. 2) Some of their primary food sources are in decline due to global warming. This is an indisputable fact. 3) They have the lowest reproduction rate of any North American animal. If hunted, their numbers could be driven down past the point of recovery, because there is no reliable way to count them, especially by gender. Sows will be killed and cubs left to starve or be killed by predators or hunters. 4) They are an important factor in the Yellowstone ecosystem. To remove any of them would be a disservice! Additionally, grizzly bears bring thousands, if not millions, of people to Yellowstone each year. There is no reason why we can't live with the grizzly bears. People need to be responsible, so bears don't have to be killed or removed from the Greater Yellowstone Ecosystem. Over 50 were removed in 2015, mostly due to human negligence, even with protection. Without protection it would be a fiasco. Greed and the desire to mount a grizzly bear head on the wall is what I believe, is driving this decision to delist them. It has nothing to do with conservation. Turning the fate of the grizzly bear over to anti-carnivore states would be a disaster that could result in the demise of the grizzly bear. Many of these bears, especially sows with cubs have grown accustomed to humans and would be easy targets for hunters. Allowing hunting in areas close to Yellowstone and Grand Teton parks would be a complete disaster and some of the states are even talking about allowing that. Some hunters are already targeting particular bears as soon as they are delisted. Please withdraw your request to delist the grizzly bears. These bears are an important part of the ecosystem and are loved by people who come to visit the area. We live in Montana and I know we can find a way to live with the grizzlies. We don't need to kill them.	FWS-R6-ES-2016-0042-0306	
Once a sustainable population exists, which based on numbers and comments from Wildlife Managers I believe it does, hunt them. Large predators needs to be hunted in general to make them fear humans, and many people enjoy hiking, fishing and spending time in Grizzly country. A hunted population should run from humans. When bears don't run, there is too much risk of human interaction, which leads to maulings.	Factor B	Use science based wildlife management. Once a sustainable population exists, which based on numbers and comments from Wildlife Managers I believe it does, hunt them. Large predators needs to be hunted in general to make them fear humans, and many people enjoy hiking, fishing and spending time in Grizzly country. A hunted population should run from humans. When bears don't run, there is too much risk of human interaction, which leads to maulings. In summary, trust the scientists to determine sustainable populations, not politicians or the public, and hunt them to keep sustainable populations in check and behaved.	FWS-R6-ES-2016-0042-0303	

Grizzly bears are already dying in record numbers. In 2015 alone, a record 59 grizzlies were known to have died in the ecosystem, the vast majority of which were human caused (killed by hunters, "management removals" etc). What is even more concerning is that 2015 is by no means an outlier year. Known and probable mortalities have exceeded 50 bears for 3 out of the last 6 years, often violating the government's own mortality limits. This increased mortality is often spun by USFWS as the natural result of more bears in the population. The problem with this is that the grizzly population has not increased substantially since the early 2000's, according to their own data.	Factor B	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	
As soon as their Endangered Species protection is removed, I fear that these iconic bears will be hunted mercilessly for their coats, paws, a noble head to mount on a hunter's wall or the animal's entire carcass to be preserved/taxidermy and displayed at a hunting lodge for bragging rights. Meanwhile, in the forest, orphaned cubs will die of starvation or, not having finished learning the lessons of how to be a "good bear" in a national park from its mother--i.e., which animals are food (elk, deer, vermin, berries, etc) and which are threat (humans), will become a danger to people and, ultimately, themselves. Left to their own devices, Grizzly bears typically prefer to avoid dangerous encounters with any rival predator. If humans become their #1 enemy again, be sure that their natural prey will suffer, too: overpopulation, explosion of disease that the predators would have controlled, and compromise in the genetic strength of the herds. When the Grizzly is no longer around to fell the weaker members of the species, any animal will have a greater chance of breeding, not just the strongest and fittest members.	Factor B	Grizzly bears are an important species, and their species population has not rebounded so much that they can long survive being removed from the list of Endangered and Threatened Wildlife. Just a couple weeks ago, I submitted a comment to protest the slaughter of Yellowstone Bison. Apparently, the Forest Service thought it was necessary to cull the species population to prevent the spread of a bovine virus that could infect domestic cattle grazing nearby. If there was truly a "healthy" size/population of Grizzly bears in the park, that cull would not have been needed. These and other apex predators (such as wolves, cougars, etc.) naturally hunt weakened prey animals such as the sick/infected bison. The bears help to maintain a healthy population balance between predator and prey species. As soon as their Endangered Species protection is removed, I fear that these iconic bears will be hunted mercilessly for their coats, paws, a noble head to mount on a hunter's wall or the animal's entire carcass to be preserved/taxidermy and displayed at a hunting lodge for bragging rights. Meanwhile, in the forest, orphaned cubs will die of starvation or, not having finished learning the lessons of how to be a "good bear" in a national park from its mother--i.e., which animals are food (elk, deer, vermin, berries, etc) and which are threat (humans), will become a danger to people and, ultimately, themselves. Left to their own devices, Grizzly bears typically prefer to avoid dangerous encounters with any rival predator. If humans become their #1 enemy again, be sure that their natural prey will suffer, too: overpopulation, explosion of disease that the predators would have controlled, and compromise in the genetic strength of the herds. When the Grizzly is no longer around to fell the weaker members of the species, any animal will have a greater chance of breeding, not just the strongest and fittest members. Please, please re-think your proposal to remove the protected status of these bears.	FWS-R6-ES-2016-0042-0349	

Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. Å	Factor B	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose.	FWS-R6-ES-2016-0042-0320	
Please do not de-list these animals at a federal level. Their numbers may be increasing slightly, but de-listing them will lead to them being the responsibility of individual states - which ALWAYS seems to result in species being increasingly hunted, and their numbers then decline. Protect them at the highest level and as well as protecting a sentient species, and keeping an ecological balance. you will reap economic rewards from wildlife tourism, (something which does not exist in many other countries).	Factor B	Please do not de-list these animals at a federal level. Their numbers may be increasing slightly, but de-listing them will lead to them being the responsibility of individual states - which ALWAYS seems to result in species being increasingly hunted, and their numbers then decline. Protect them at the highest level and as well as protecting a sentient species, and keeping an ecological balance. you will reap economic rewards from wildlife tourism, (something which does not exist in many other countries).	FWS-R6-ES-2016-0042-0411	

I am writing to OPPOSE the delisting of the grizzly bears of the Greater Yellowstone ecosystem. While I am pleased that grizzly numbers have reached a threshold that they are safer from extinction, we have learned all too well that delisting is "code" for "now we can hunt them for fun".The managed hunting of deer, elk and other prey animals is appropriate and within the context of natural ecosystems. The hunting of carnivores, especially apex carnivores like the grizzly bear is not. It is aberrant, and inappropriate and damages wild places.FWS data on Grizzlies do not show increasing populations, they have only just maintained their numbers for the past 15 years. Declining food sources (white pine bark tree nuts, cutthroat trout, army cutworm moths) result in bears travelling outside the safety of the park, where they would be hunted. These declining food sources also may threaten the recovery of the bears.We are still at a time in Grizzly recovery where every bear is important. There are still too many concerns about their future well being to delist them.	Factor B	I am writing to OPPOSE the delisting of the grizzly bears of the Greater Yellowstone ecosystem. While I am pleased that grizzly numbers have reached a threshold that they are safer from extinction, we have learned all too well that delisting is "code" for "now we can hunt them for fun". The managed hunting of deer, elk and other prey animals is appropriate and within the context of natural ecosystems. The hunting of carnivores, especially apex carnivores like the grizzly bear is not. It is aberrant, and inappropriate and damages wild places. FWS data on Grizzlies do not show increasing populations, they have only just maintained their numbers for the past 15 years. Declining food sources (white pine bark tree nuts, cutthroat trout, army cutworm moths) result in bears travelling outside the safety of the park, where they would be hunted. These declining food sources also may threaten the recovery of the bears. We are still at a time in Grizzly recovery where every bear is important. There are still too many concerns about their future well being to delist them.	FWS-R6-ES-2016-0042-0426	
In 2015, many of us got to see first hand what happens when an animal, well known by the public, is taken by a hunter. Cecil the Lion was hunted for nothing more than a trophy, in a similar way in which Grizzly Bears would be hunted should they be delisted. The public outcry was tremendous, resulting in the hunter nearly losing his dental practice due to the negative publicity. One must question if any of our elected public officials, outfitters, or local businesses are prepared for the type of public outcry which will happen if certain bears are killed by hunters. One outfitter in Jackson has been quoted as saying he wants bear 399's head on his wall. If the world's most famous Grizzly is allowed to be killed, simply out of spite and for a trophy, the repercussions on Wyoming's tourism industry will be great.	Factor B	I am writing today to express my concerns about the delisting of the Grizzly Bear (<i>Ursus arctos horribilis</i>) from the Endangered Species Act (ESA). While the species might have reached population numbers which warrant delisting, this species is far from being on the road to permanent recovery. The science points to many obstacles which will prevent this species from thriving once removed from the ESA. From human development and conflicts (loss of habitat), to declining numbers of White Bark Pine and cutthroat trout, the species has a number of challenges facing it. In 2015, close to 10% of the total population was euthanized due to conflicts with human. It does not take a PhD to understand that at this rate, in just 10 years, the species would be extinct. As an individual who is employed in the conservation and protection field, all too often I personally witness careless individuals recreating in grizzly habitat who leave food and other odorous items well within the reach of bears. This lack of care by these individuals will only serve to create additional habituated bears which will need to be destroyed, thus further decreasing the population. The US Government has spent millions of dollars to protect and grow this population of bears, and now seem to want to throw that investment away. This is an unwise use of tax dollars. A recent survey indicated that 81% of visitors to the Greater Yellowstone Ecosystem want to see a bear. This data indicates that people vacationing come to Wyoming, and spend thousands of dollars per visit, with the hopes of seeing a bear. With a declining population due to delisting, less people will be afforded the opportunity to see a bear. As the population numbers further decline, one would expect less tourists to visit, resulting in less tourism dollars funneling into an already cash strapped state. In 2015, many of us got to see first hand what happens when an animal, well known by the public, is taken by a hunter. Cecil the Lion was hunted for nothing more than a trophy, in a similar way in which Grizzly Bears would be hunted should they be delisted. The public outcry was tremendous, resulting in the hunter nearly losing his dental practice due to the negative publicity. One must question if any of our elected public officials, outfitters, or local businesses are prepared for the type of public outcry which will happen if certain bears are killed by hunters. One outfitter in Jackson has been quoted as saying he wants bear 399's head on his wall. If the world's most famous Grizzly is allowed to be killed, simply out of spite and for a trophy, the repercussions on Wyoming's tourism industry will be great. I ask you to reconsider the implications of your decisions regarding the Grizzly Bear. This state can not afford for the tourism industry to suffer at the same time the oil industry has essentially gone bankrupt. If Wyoming keeps with it's anti-predator mindset, just to appease a minority of the population, this state will suffer grave	FWS-R6-ES-2016-0042-0451	

Despite "training" and rules against killing female bears with cubs, it still happens because the females may leave their cubs in a tree to go forage for themselves.	Factor B	I am against the delisting of the Grizzlies. As a top tier predator, their presence is necessary to keeping their environment in check. While their numbers have been slowly increasing, they are not yet a stable population. Being, in effect, cut off from bears in other management and refuge areas by not having protected wildlife corridors between these places, you limit the genetic pool, which contribute to their decline. Instead of delisting, we need to not only protect the bears, but people who live in bear country need to learn to coexist with the bears and protected wildlife corridors need to be designated allowing bears to roam safely between the parks, refuges, and reserves. As for making profits from bears, photo safari's tend to make more money than trophy hunting because they can be taken almost all year round, and it doesn't end in death for the animals. Despite "training" and rules against killing female bears with cubs, it still happens because the females may leave their cubs in a tree to go forage for themselves. I have yet to get to visit the Yellowstone area, but I pray that when I do make it there, that the grizzly will be there and thriving.	FWS-R6-ES-2016-0042-0441	
The USFWS own recovery plan does not demonstrate that the YEP of Grizzly bears is stable and has reached a point that release from the ESA is warranted. Release of the bears from protection would undoubtedly cause very high trophy hunting mortality in the surrounding states of Wyoming, Idaho, and Montana, as YEP bears forage in wider ranges, not knowing park protection boundaries.	Factor B	I have reviewed information concerning the delisting of Yellowstone's grizzly bears, and have reached the conclusion that there is not proof that the population of bears has grown to stable numbers. In fact, the bear seems to be in decline from stable growth, due to food source depletion and habitat deterioration, human interaction mortality, both accidental and illegal, and scarcity of cub success due to the above human and environmental interactions. The USFWS own recovery plan does not demonstrate that the YEP of Grizzly bears is stable and has reached a point that release from the ESA is warranted. Release of the bears from protection would undoubtedly cause very high trophy hunting mortality in the surrounding states of Wyoming, Idaho, and Montana, as YEP bears forage in wider ranges, not knowing park protection boundaries. Please do not remove grizzly bears from the federal list of endangered species. I am not a young tree hugger, but a grandfather, life NRA member, and an environmental hunter. I want my great-grandchildren to be able to see grizzly's in the wild.	FWS-R6-ES-2016-0042-0460	

I also feel their fear of humans is not where should be because they haven't been hunted in such a long time that it gets them into trouble because of lack of fear.	Factor B	I am in support of DE-LISTING the Grizzly Bear. Although I am not a resident of Wyoming I spend time there and I believe there is too many Grizzly Bears than they need to be. I am not for completely getting rid of them, but I feel the population has grown out of control and it has gotten to the point where they are expanding in areas they don't need to be. I also feel their fear of humans is not where should be because they haven't been hunted in such a long time that it gets them into trouble because of lack of fear. I strongly support conservation and want to see the elk, moose and deer herds thrive in the great state of Wyoming that I love enjoying so much. Please consider delisting the Grizzly Bear. Thank you for your consideration.	FWS-R6-ES-2016-0042-5033	
Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting. 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium.	Factor B	1. Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population. 2. Grizzly bears are not recovered across their historic range. 3. Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399, would be threatened by the delisting. The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "the reality is that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yaak region." Therefore, the grizzly bear cannot be delisted in just the Great Yellowstone Area. Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting. 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. Finally, I agree with Tom Poor Bear who concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations." Do not delist grizzly bears!	FWS-R6-ES-2016-0042-5023	

This year alone there was 62 grizzly deaths with the vast majority being human related. That is close to 7% of the population that they claim lives in the greater Yellowstone area. Out of those deaths where information is provided 15 were listed as females. Bears reproduce at extremely slow rates with female bears reaching sexual maturity around 7 years old. This means the loss of female bears and often times their cubs can dramatically impact the future of the population moving forward.	Factor B	I strongly oppose the de-listing of the grizzly bear from Federal protections. While the recovery of the grizzly is a great success story there are several factors that make this recovery potentially unstable. This year alone there was 62 grizzly deaths with the vast majority being human related. That is close to 7% of the population that they claim lives in the greater Yellowstone area. Out of those deaths where information is provided 15 were listed as females. Bears reproduce at extremely slow rates with female bears reaching sexual maturity around 7 years old. This means the loss of female bears and often times their cubs can dramatically impact the future of the population moving forward. Several environmental changes are also having harsh impacts on the bears food supplies which will undoubtedly add extra pressures on the population. Grizzlies are the last of the great apex predators living in the lower 48 and we all should do what we can to preserve their legacy.	FWS-R6-ES-2016-0042-0485	
ome this is clearly motivated by politics, not science. Delisted bears will be vulnerable to trophy hunting--that we can agree on--by short sightedpoliticians looking at a few dollars from the hunts and ignoring the millions in grizzly bear driven tourism that the states are benefitting from. Surely the grizzly bear deserves better than a future as a trophy head hanging over the fireplace or rug on the floor, feeding not the body but the ego. For this will be the sad legacy of the decision makers who allow or cause this to happen.	Factor B	My comment is that I oppose this action for several reasons. It is not so much which you say but all that you do not say. First of all, why the population count in 1975 was so low the bear needed listing. "The best available science" of that time resulted from a rapid closing of the garbage dumps in Yellowstone National Park which was NOT recommended and was warned against by scientists like the Craighead brothers, whose advice was ignored. It was a poor management decision, considering the abrupt population decline which required subsequent listing. Now you say the "best available science" indicates the population has recovered and is increasing, and that it is "safe", despite numerous indications of potential threats to them which cannot be mitigated, and you ignore scientists like Dave Mattson and others who clearly delineate these. I am also opposed to the delisting and handing the grizzly bears over to the state of Wyoming for trophy hunting. I believe that is a terrible idea, not just because I am morally against trophy hunting but also because having lived in grizzly bear habitat for 36 years in Wyoming, I have spent every year of that cringing at the attitudes and actions of the state governments of Montana, Wyoming, and Idaho toward wildlife of all sorts, and predators in particular. Let alone the trigger happy "haters" of bears and wolves. And these are states that host "wildlife killing contests"! Whether state government politicians capitulating to non wildlife interests and consumptive uses to keep themselves in office, or federal government employees motivated to declare a victory in grizzly bear recovery as a monument to themselves before they retire, there is a vested interest motivating the decision making to delist the Yellowstone grizzly bears. National Parks like Yellowstone and Grand Teton supposedly protect millions of acres against this human tendency to choose personal gain (i.e. real estate development, etc.) over wildlife protection and healthy populations. Stripping the Yellowstone ecosystem grizzly bears of endangered species protection is at best short sighted and quite frankly, planned murder. This isn't the time, the place, or the species to do it with. To me this is clearly motivated by politics, not science. Delisted bears will be vulnerable to trophy hunting--that we can agree on--by short sighted politicians looking at a few dollars from the hunts and ignoring the millions in grizzly bear driven tourism that the states are benefitting from. Surely the grizzly bear deserves better than a future as a trophy head hanging over the fireplace or rug on the floor, feeding not the body but the ego. For this will be the sad legacy of the decision makers who allow or cause this to happen.	FWS-R6-ES-2016-0042-0481	

I fear overhunting will cause the bears to be forced back onto this list or, even worse, they reduce in such a great number that the species cannot be saved.	Factor B	I am extremely skeptical of the possible impacts this could have. I fear overhunting will cause the bears to be forced back onto this list or, even worse, they reduce in such a great number that the species cannot be saved. If the grizzly bears are becoming a huge problem for residents, tourists, and businesses, then I would support their removal from the list. I would need to see more data regarding grizzly bear interaction with humans to support this. As I said, I fear what would happen if we are too quick to remove them from the list.	FWS-R6-ES-2016-0042-0509	
The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management.	Factor B	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of	FWS-R6-ES-2016-0042-0463	

The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Â	Factor B	The U.S. Fish and Wildlife Service (FWS) wants to strip Endangered Species Act protection from the Greater Yellowstone Ecosystem grizzly bear. We have only until May 10 to comment on the FWS proposal. FWS claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattsonf, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claim: The shortage of cutthroat trout and white bark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48.	FWS-R6-ES-2016-0042-5043	
FWS claim: Their agency will stay involved with protecting the grizzly population after delisting. Â The reality: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. Â HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. Â	Factor B	The U.S. Fish and Wildlife Service (FWS) wants to strip Endangered Species Act protection from the Greater Yellowstone Ecosystem grizzly bear. We have only until May 10 to comment on the FWS proposal. FWS claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattsonf, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claim: The shortage of cutthroat trout and white bark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from	FWS-R6-ES-2016-0042-5043	

Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife, primarily grizzlies and wolves. Allowing a "trophy" hunt, targeting the park grizzlies is not only an easy hunt, but not a hunt at all, no less an ambush of the species.	Factor B	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside	FWS-R6-ES-2016-0042-0463	
The agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. The reality: When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." ^ Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America. x If conditions are right, a female gives birth only every three years. ^ In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport x hunting. ^	Factor B	The U.S. Fish and Wildlife Service (FWS) wants to strip Endangered Species Act protection from the Greater Yellowstone Ecosystem grizzly bear. We have only until May 10 to comment on the FWS proposal. FWS claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claim: The shortage of cutthroat trout and white bark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from	FWS-R6-ES-2016-0042-5043	

It's like a contractor offering a long dormant group of arsonists the opportunity to keep burning a house that they once nearly destroyed and he hasn't quite repaired. Sport hunters aren't criminals, but it is a destructive practice that depletes a population much faster than government efforts can rebuild them.	Factor B	It's misleading to give the doubling of this population as an indicator if its stability. That doubling was the growth from 2% of the number in existence for tens of thousands of years and then reduced by 98% in less than one hundred years by sport hunting, nearly decimated twice, to 4%. And that growth was a result if FWS efforts. Why would the FWS put the results of that work in jeopardy by allowing same practice that nearly brought the grizzly to extinction in the last century? "Fool me once..." It's like a contractor offering a long dormant group of arsonists the opportunity to keep burning a house that they once nearly destroyed and he hasn't quite repaired. Sport hunters aren't criminals, but it is a destructive practice that depletes a population much faster than government efforts can rebuild them. FWS' works shouldn't be squandered like this. Only 20-26% of people surveyed have supported delisting or hunting seasons and the rates are lower in the local area. 50 Native governments have sent formal documents announcing their opposition to the delisting. There is no popular support for delisting. The tourism benefit of bringing into GYE sport hunters is so small compared to the loss of non-hunting tourists, as all of them now are, for whom the chance of seeing wildlife is such an important part of the park's appeal. For every one person who could shoot a given grizzly, fifty could have the experience if crossing its path, or seeing it through a telescope, finding its scat on a trail, or seeing the unbelievably high scratchings on a tree. Those are all memorable, maybe beautiful, maybe exhilarating or even terrifying experiences that make lifelong impressions and are taken away from a tourist, park ranger, local resident, and the whole ecosystem when a bear is killed. The potential tourism growth is outweighed by the potential loss, people don't support this, at all, and it doesn't make sense to hand the small recovery the GYE ecosystem has made straight back to the interests that recklessly inflicted the injury it's currently nursing, no matter how slow or carefully.	FWS-R6-ES-2016-0042-5067	
Only 20-26% of people surveyed have supported delisting or hunting seasons and the rates are lower in the local area.	Factor B	It's misleading to give the doubling of this population as an indicator if its stability. That doubling was the growth from 2% of the number in existence for tens of thousands of years and then reduced by 98% in less than one hundred years by sport hunting, nearly decimated twice, to 4%. And that growth was a result if FWS efforts. Why would the FWS put the results of that work in jeopardy by allowing same practice that nearly brought the grizzly to extinction in the last century? "Fool me once..." It's like a contractor offering a long dormant group of arsonists the opportunity to keep burning a house that they once nearly destroyed and he hasn't quite repaired. Sport hunters aren't criminals, but it is a destructive practice that depletes a population much faster than government efforts can rebuild them. FWS' works shouldn't be squandered like this. Only 20-26% of people surveyed have supported delisting or hunting seasons and the rates are lower in the local area. 50 Native governments have sent formal documents announcing their opposition to the delisting. There is no popular support for delisting. The tourism benefit of bringing into GYE sport hunters is so small compared to the loss of non-hunting tourists, as all of them now are, for whom the chance of seeing wildlife is such an important part of the park's appeal. For every one person who could shoot a given grizzly, fifty could have the experience if crossing its path, or seeing it through a telescope, finding its scat on a trail, or seeing the unbelievably high scratchings on a tree. Those are all memorable, maybe beautiful, maybe exhilarating or even terrifying experiences that make lifelong impressions and are taken away from a tourist, park ranger, local resident, and the whole ecosystem when a bear is killed. The potential tourism growth is outweighed by the potential loss, people don't support this, at all, and it doesn't make sense to hand the small recovery the GYE ecosystem has made straight back to the interests that recklessly inflicted the injury it's currently nursing, no matter how slow or carefully.	FWS-R6-ES-2016-0042-5067	

5- THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Please consider these issues closely before making a final decision. My hope is that the Grizzlies remain on the ESA for many years to come, as this is not the time to delist. But, if the final decision is to delist, I would certainly hope you would consider expanding the boundaries of protection for the Grizzlies around the GYE 20-50 miles. These Grizzlies do wander outside of the park boundaries in search of food and for hibernation, which would subject them to being hunted.	Factor B	Please consider the following as valid reasons NOT to remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. 1- EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. 2- DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. 3- GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected. 4- DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. 5- THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Please consider these issues closely before making a final decision. My hope is that the Grizzlies remain on the ESA for many years to come, as this is not the time to delist. But, if the final decision is to delist, I would certainly hope you would consider expanding the boundaries of protection for the Grizzlies around the GYE 20-50 miles. These Grizzlies do wander outside of the park boundaries in search of food and for hibernation, which would subject them to being hunted.	FWS-R6-ES-2016-0042-5055	
It is a fact that a prime motivation for the states of Idaho, Montana and Wyoming in pushing for delisting of Grizzly bears is trophy hunting and the perceived economic gain this 'sport' will bring.	Factor B	Please do not delist Grizzly Bears. Now is not the time to take away protections for this at-risk native species. In a time when climate change and habitat loss are challenging all wildlife to adapt and survive, the only reasonable and responsible action will be to rule that Grizzly Bears should not be delisted at this time. Grizzly bear food sources (including the whitebark pine) are collapsing and mortality rates are already increasing. Yellowstone Grizzly bears are experiencing a high level of conflict with humans and delisting would mean that any hungry bear who steps outside Yellowstone National Park will be killed by waiting hunters. Bears do not recognize park boundaries and bears just need to eat. The Greater Yellowstone Ecosystem is their home, and that includes the park and areas outside its boundaries. It is a fact that a prime motivation for the states of Idaho, Montana and Wyoming in pushing for delisting of Grizzly bears is trophy hunting and the perceived economic gain this 'sport' will bring. While the USFWS estimates there are more than 700 grizzlies in the Greater Yellowstone Ecosystem, no one really knows how many bears there are and this number could well be an over-estimation of true populations. Until it is known exactly how many grizzly bears exist in the Greater Yellowstone Ecosystem, it would be irresponsible to delist them and allow the states to open up their trophy hunt programs. Sport hunting is unnecessary for managing a stable bear population. At minimum, there should be a delay in the onset of hunting until Idaho, Montana and Wyoming have demonstrated their commitment to a responsible management plan and maintaining a stable population, particularly given the record high number (59) of bears killed in 2015. The leading cause of bear mortality is conflicts with humans. In remembrance of Scarface, the 25-year old Grizzly bear who was a park visitor favorite, and the first Grizzly bear I ever saw. Yet he was recently killed by a hunter outside park boundaries when he wandered, likely in search of food. A park icon gone, because he didn't read the park boundary signs and someone was waiting to kill him. This is what will happen to many more Grizzly bears if they are delisted now. Please do not delist Grizzly bears at this time. They must remain protected until Idaho, Montana and Wyoming have reasonable and science-based management plans in place, plans that do not consist of trophy hunting. Thank you for your consideration.	FWS-R6-ES-2016-0042-5074	

Sport hunting is unnecessary for managing a stable bear population. At minimum, there should be a delay in the onset of hunting until Idaho, Montana and Wyoming have demonstrated their commitment to a responsible management plan and maintaining a stable population, particularly given the record high number (59) of bears killed in 2015.	Factor B	Please do not delist Grizzly Bears. Now is not the time to take away protections for this at-risk native species. In a time when climate change and habitat loss are challenging all wildlife to adapt and survive, the only reasonable and responsible action will be to rule that Grizzly Bears should not be delisted at this time. Grizzly bear food sources (including the whitebark pine) are collapsing and mortality rates are already increasing. Yellowstone Grizzly bears are experiencing a high level of conflict with humans and delisting would mean that any hungry bear who steps outside Yellowstone National Park will be killed by waiting hunters. Bears do not recognize park boundaries and bears just need to eat. The Greater Yellowstone Ecosystem is their home, and that includes the park and areas outside its boundaries. It is a fact that a prime motivation for the states of Idaho, Montana and Wyoming in pushing for delisting of Grizzly bears is trophy hunting and the perceived economic gain this 'sport' will bring. While the USFWS estimates there are more than 700 grizzlies in the Greater Yellowstone Ecosystem, no one really knows how many bears there are and this number could well be an over-estimation of true populations. Until it is known exactly how many grizzly bears exist in the Greater Yellowstone Ecosystem, it would be irresponsible to delist them and allow the states to open up their trophy hunt programs. Sport hunting is unnecessary for managing a stable bear population. At minimum, there should be a delay in the onset of hunting until Idaho, Montana and Wyoming have demonstrated their commitment to a responsible management plan and maintaining a stable population, particularly given the record high number (59) of bears killed in 2015. The leading cause of bear mortality is conflicts with humans. In remembrance of Scarface, the 25-year old Grizzly bear who was a park visitor favorite, and the first Grizzly bear I ever saw. Yet he was recently killed by a hunter outside park boundaries when he wandered, likely in search of food. A park icon gone, because he didn't read the park boundary signs and someone was waiting to kill him. This is what will happen to many more Grizzly bears if they are delisted now. Please do not delist Grizzly bears at this time. They must remain protected until Idaho, Montana and Wyoming have reasonable and science-based management plans in place, plans that do not consist of trophy hunting. Thank you for your consideration.	FWS-R6-ES-2016-0042-5074	
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These bears are still a relatively isolated and small population. To de-list them now opens the population to trophy hunters, which can easily decimate this slowly recovering group.	Factor B	I urge the Fish and Wildlife Service to please reconsider de-listing the Grizzly Bear from the list of Endangered and Threatened Wildlife. These bears are still a relatively isolated and small population. To de-list them now opens the population to trophy hunters, which can easily decimate this slowly recovering group. Do we really want to see the bears decline such that they would need to be listed again in just two or three years? There is already abundant evidence that not all trophy hunters abide by regulations; there is poaching. These bears symbolize part of our national and natural heritage that should NOT be destroyed merely so a few more hunters can have a bear-skin rug and a tale to tell. Please protect the bears.	FWS-R6-ES-2016-0042-5086	
There is already abundant evidence that not all trophy hunters abide by regulations; there is poaching.	Factor B	I urge the Fish and Wildlife Service to please reconsider de-listing the Grizzly Bear from the list of Endangered and Threatened Wildlife. These bears are still a relatively isolated and small population. To de-list them now opens the population to trophy hunters, which can easily decimate this slowly recovering group. Do we really want to see the bears decline such that they would need to be listed again in just two or three years? There is already abundant evidence that not all trophy hunters abide by regulations; there is poaching. These bears symbolize part of our national and natural heritage that should NOT be destroyed merely so a few more hunters can have a bear-skin rug and a tale to tell. Please protect the bears.	FWS-R6-ES-2016-0042-5086	

Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399, would be threatened by the delisting.	Factor B	The USFWS is pushing to delist the Yellowstone grizzly bears. It's obvious why they're doing this. Trophy hunters are itching for a grizzly bear hunt to satisfy their blood lust and ego's and the USFWS is perfectly happy to make their dreams come true. Please don't allow this to happen. They're not just after grizzlies in the Yellowstone ecosystem but Montana is already pushing for the delisting of all grizzly bears, specifically the great bear population in Northwest Montana. Please take a moment and speak out for this iconic species. They are voiceless, we must speak for them! Follow the link to the USFWS comment page and stand up for the grizzly bear. Points to make: 1. Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population. 2. Grizzly bears are not recovered across their historic range. 3. Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399, would be threatened by the delisting. === The Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife	FWS-R6-ES-2016-0042-5087	
An example as to why delisting of protected wildlife can be detrimental to a species has occurred with State management of the wolf population in Wyoming, Montana, and Idaho. Contest killings in both Montana and Idaho have occurred, which reflect the hatred that people have for "predator" species, and have been ignored by the States' FWS.	Factor B	We are adamantly against delisting the Greater Yellowstone Grizzly Bears from the Endangered and Threatened Wildlife Species Act. An example as to why delisting of protected wildlife can be detrimental to a species has occurred with State management of the wolf population in Wyoming, Montana, and Idaho. Contest killings in both Montana and Idaho have occurred, which reflect the hatred that people have for "predator" species, and have been ignored by the States' FWS. The only certain outcome of delisting the Yellowstone grizzly bears is that it will result in trophy hunting. With delisting, the federal government will turn over grizzly management decisions outside of the park's boundaries to three states that will show no restraint in killing grizzlies. (Peacock, 2016) The Service has fiercely maintained that even if problems arise [under state management], it will not relist the population. Despite some laudatory language about co-existence with grizzly bears, the state grizzly bear management plans lack any binding commitments to do anything other than hunt bears. (Willcox, 2016) The growth of the grizzly population has leveled off; the current population estimate is down six percent from 2014. Mortality from all causes, as reported by the government, was 59 grizzlies in 2015. Reported mortality is about half of actual dead bears an accepted rule of thumb. Start adding in the bears that will be shot in the trophy hunt and you could easily approach 200 dead grizzlies in a single year. Even a population of 700 grizzly bears would be doomed to extinction by such heavy mortality. (Peacock, 2016) Even though the states may be somewhat cautious during the first five years of federal oversight that follows delisting, there is every reason to believe that, over time, state management will reverse the gains made over the last 40 years of endangered species protections. This is especially likely given the crisis that Yellowstone grizzly bears are facing now. During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably are dead. This totals over 90 bears, or more than 12% of the population. The primary factor affecting grizzly bears at both the individual and population level is excessive human-caused mortality. Regulating human-caused mortality through habitat management is an effective approach, as evidenced by increasing grizzly bear populations in the lower 48 States where motorized access standards exist (e.g., GYE and Northern Continental Divide Ecosystem). This requires ongoing monitoring of the grizzly bear population to understand if it is sufficiently resilient to allow	FWS-R6-ES-2016-0042-5103	

With delisting, the federal government will turn over grizzly management decisions outside of the park's boundaries to three states that will show no restraint in killing grizzlies. (Peacock, 2016) The Service has fiercely maintained that even if problems arise [under state management], it will not relist the population. Despite some laudatory language about co-existence with grizzly bears, the state grizzly bear management plans lack any binding commitments to do anything other than hunt bears. (Willcox, 2016)	Factor B	We are adamantly against delisting the Greater Yellowstone Grizzly Bears from the Endangered and Threatened Wildlife Species Act. An example as to why delisting of protected wildlife can be detrimental to a species has occurred with State management of the wolf population in Wyoming, Montana, and Idaho. Contest killings in both Montana and Idaho have occurred, which reflect the hatred that people have for "predator" species, and have been ignored by the States' FWS. The only certain outcome of delisting the Yellowstone grizzly bears is that it will result in trophy hunting. With delisting, the federal government will turn over grizzly management decisions outside of the park's boundaries to three states that will show no restraint in killing grizzlies. (Peacock, 2016) The Service has fiercely maintained that even if problems arise [under state management], it will not relist the population. Despite some laudatory language about co-existence with grizzly bears, the state grizzly bear management plans lack any binding commitments to do anything other than hunt bears. (Willcox, 2016) The growth of the grizzly population has leveled off; the current population estimate is down six percent from 2014. Mortality from all causes, as reported by the government, was 59 grizzlies in 2015. Reported mortality is about half of actual dead bears an accepted rule of thumb. Start adding in the bears that will be shot in the trophy hunt and you could easily approach 200 dead grizzlies in a single year. Even a population of 700 grizzly bears would be doomed to extinction by such heavy mortality. (Peacock, 2016) Even though the states may be somewhat cautious during the first five years of federal oversight that follows delisting, there is every reason to believe that, over time, state management will reverse the gains made over the last 40 years of endangered species protections. This is especially likely given the crisis that Yellowstone grizzly bears are facing now. During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably are dead. This totals over 90 bears, or more than 12% of the population. The primary factor affecting grizzly bears at both the individual and population level is excessive human-caused mortality. Regulating human-caused mortality through habitat management is an effective approach, as evidenced by increasing grizzly bear populations in the lower 48 States where motorized access standards exist (e.g., GYE and Northern Continental Divide Ecosystem). This	FWS-R6-ES-2016-0042-5103	
the uncertainty of the unpredictable behavior of humans who seek to kill a Grizzly for sport or vengeance if Grizzly Bears are no longer protected under federal law. Threats have already been made by some to seek out and intentionally kill one of the most famous Grizzly Bear mothers, 399, in Grand Teton National Park.	Factor B	I am writing to implore you to stop the proposed delisting of the Grizzly Bear in the Greater Yellowstone Ecosystem from the Federal List of Endangered and Threatened Wildlife. The reported facts and research, compiled by different researchers, is conflicting, to say the least, in regards to defining the current Grizzly Bear population as recovered. Facts will always be conflicting as scientists view their data through their lens of their inquiry. We all have a way we see the world and it profoundly influences the actions we take. Call it the uncertainty principle or the observer effect from quantum physics. Although people try to do their best, I believe it is not possible to be completely objective in how they interpret their research. That's why it's important to listen to other's perspectives and take into consideration what they, too, are observing. So what we are left with is always the intention and motivation of those interpreting the data. That's where the true wisdom comes in. Delisting is not feasible or desirable at this time for many reasons. Grave uncertainty being the main one. Uncertainty about the ongoing unpredictable effects of climate change and how that unfolding story will influence the food choices and survival of the Grizzly Bears. Uncertainty about the increased pressures of expanding human populations on the Grizzly families as more and more people move west, encroaching on their territory. That increased human presence, gobbling up the land, is only pressuring the Grizzlies into closer human contact, year by year. And lastly, the uncertainty of the unpredictable behavior of humans who seek to kill a Grizzly for sport or vengeance if Grizzly Bears are no longer protected under federal law. Threats have already been made by some to seek out and intentionally kill one of the most famous Grizzly Bear mothers, 399, in Grand Teton National Park. Yes, progress has been made, but the conditions on the ground have changed dramatically since the IGBC was set in motion almost three decades ago. It is important to base this decision to potentially delist on the ground-truthing of this present century, not in goals of past decades when this Committee was first given this honorable task of recovering the at-risk populations. It is important for you to at least consider that it may never be wise or safe to delist the Grizzly Bear. And that does not constitute failure. That represents wisdom. I thank you for your service in regards to the leadership that has been entrusted to you, by all of us, the Public trust, to safeguard the well-being of our Greater Yellowstone Grizzly Bear population. Please don't take hasty actions to delist them, based on short-term reasons such as procedure, protocol or personal legacy. I implore you to consider the long-view, which is solely your responsibility, and in your hands, as wise leaders and elders. Thank you for your crucial consideration to halt delisting process at this time. May it be so. Thank you, Lyn Delebout	FWS-R6-ES-2016-0042-5132	

Grizzly bear recovery has been a slowly successful, long-term process for the Interagency Grizzly Bear Study Team; they should be proud of their efforts. But I don't believe there is scientific consensus that the species is beyond the need for protection. And I don't believe there is agreement among all interests that the grizzly population is stable enough to withstand hunting.	Factor B	I am writing to say I do not support the USFWS plan to delist the grizzly bear. Grizzly bear recovery has been a slowly successful, long-term process for the Interagency Grizzly Bear Study Team; they should be proud of their efforts. But I don't believe there is scientific consensus that the species is beyond the need for protection. And I don't believe there is agreement among all interests that the grizzly population is stable enough to withstand hunting. The USFWS states in a their press release from March 3, 2016 that delisting does not solely rely on numbers but also includes "the quantity and quality of habitat, adequate regulatory mechanisms to maintain a healthy and viable population, and a good balance of male and female bears that are well-distributed throughout the ecosystem." I believe all of these factors are unresolved and continue to place the grizzly bear at risk. 1) Quantity/quality of habitat. Climate change and development pressure continue to impact grizzly bear food sources and habitat. Traditional food sources (whitebark pine, cutworm moths, cutthroat trout) are threatened by climate change and invasive species. Development continues to fragment the edges and connectivity of core grizzly bear range. Management needs to aggressively protect habitat including limiting development and road densities in core areas. USFWS needs to work with states and other land management agencies to ensure long-term habitat protection. 2) Regulatory mechanisms. There are not adequate regulatory mechanisms in place to guarantee grizzly populations are maintained, especially if hunting is allowed. USFWS and states need to set strict caps on grizzly mortality and ensure mechanisms and funding are in place to reduce human-bear conflict. 3) Bear distribution. Scientists and concerned citizens have always maintained that in order to ensure a strong and stable population there must be a genetic connectivity to other grizzly populations in the Northern Rockies. I am concerned that pressure from hunting and other human-bear conflict will continue to isolate the Greater Yellowstone population. On an emotional and intellectual level I just don't believe an iconic animal such as the grizzly bear should be hunted. If they were restored to their historic range and allowed to roam the Rocky Mountains, the Great Plains and the Central Valley I might feel differently, but that is never going to happen. I think there is too much risk of increased mortality to bears if a spring and fall hunting season is opened. Finally, I don't think delisting is an appropriate tool of adaptive management when applied to conservation biology. I'm not sure it works well within the regulatory framework of the Endangered Species Act. It is too coarse, too slow, and does not allow for versatile adaptability. I think it will be much more challenging to relist the grizzly than it is to delist (which is proving challenging enough). The numbers might look good at this moment in time but I'm worried about the	FWS-R6-ES-2016-0042-5158	
On an emotional and intellectual level I just don't believe an iconic animal such as the grizzly bear should be hunted. If they were restored to their historic range and allowed to roam the Rocky Mountains, the Great Plains and the Central Valley I might feel differently, but that is never going to happen. I think there is too much risk of increased mortality to bears if a spring and fall hunting season is opened.	Factor B	I am writing to say I do not support the USFWS plan to delist the grizzly bear. Grizzly bear recovery has been a slowly successful, long-term process for the Interagency Grizzly Bear Study Team; they should be proud of their efforts. But I don't believe there is scientific consensus that the species is beyond the need for protection. And I don't believe there is agreement among all interests that the grizzly population is stable enough to withstand hunting. The USFWS states in a their press release from March 3, 2016 that delisting does not solely rely on numbers but also includes "the quantity and quality of habitat, adequate regulatory mechanisms to maintain a healthy and viable population, and a good balance of male and female bears that are well-distributed throughout the ecosystem." I believe all of these factors are unresolved and continue to place the grizzly bear at risk. 1) Quantity/quality of habitat. Climate change and development pressure continue to impact grizzly bear food sources and habitat. Traditional food sources (whitebark pine, cutworm moths, cutthroat trout) are threatened by climate change and invasive species. Development continues to fragment the edges and connectivity of core grizzly bear range. Management needs to aggressively protect habitat including limiting development and road densities in core areas. USFWS needs to work with states and other land management agencies to ensure long-term habitat protection. 2) Regulatory mechanisms. There are not adequate regulatory mechanisms in place to guarantee grizzly populations are maintained, especially if hunting is allowed. USFWS and states need to set strict caps on grizzly mortality and ensure mechanisms and funding are in place to reduce human-bear conflict. 3) Bear distribution. Scientists and concerned citizens have always maintained that in order to ensure a strong and stable population there must be a genetic connectivity to other grizzly populations in the Northern Rockies. I am concerned that pressure from hunting and other human-bear conflict will continue to isolate the Greater Yellowstone population. On an emotional and intellectual level I just don't believe an iconic animal such as the grizzly bear should be hunted. If they were restored to their historic range and allowed to roam the Rocky Mountains, the Great Plains and the Central Valley I might feel differently, but that is never going to happen. I think there is too much risk of increased mortality to bears if a spring and fall hunting season is opened. Finally, I don't think delisting is an appropriate tool of adaptive management when applied to conservation biology. I'm not sure it works well within the regulatory framework of the Endangered Species Act. It is too coarse, too slow, and does not allow for versatile adaptability. I think it will be much more challenging to relist the grizzly than it is to delist (which is proving challenging enough). The numbers might look good at this moment in time but I'm worried about the	FWS-R6-ES-2016-0042-5158	

Hunting of top-tier predators is not supportive of healthy ecosystems (if you are biologists, you KNOW this). If the USFWS has to de-list animals like wolves, grizzly, etc. the agency must establish another form of protection for these animals that will a) prevent them from being hunted, and b) protect their habitat. I suggest someone out there take the lead in passage of a Predator Protection Act, so there will be another mechanism in place to protect these species when the ESA no longer serves them. Thank you for being forward thinking and pro-active.	Factor B	I am respectfully writing to ask you to please not remove the Greater Yellowstone Ecosystem population of grizzly bears from the federal list of T&E species. As soon as they are de-listed, they will be hunted. Animals will suffer, and grizzly numbers will once again plummet. Hunting of top-tier predators is not supportive of healthy ecosystems (if you are biologists, you KNOW this). If the USFWS has to de-list animals like wolves, grizzly, etc. the agency must establish another form of protection for these animals that will a) prevent them from being hunted, and b) protect their habitat. I suggest someone out there take the lead in passage of a Predator Protection Act, so there will be another mechanism in place to protect these species when the ESA no longer serves them. Thank you for being forward thinking and pro-active.	FWS-R6-ES-2016-0042-5218	
#NAME?	Factor B	#NAME?	FWS-R6-ES-2016-0042-5249	

The US FWS holds wildlife in the public trust for the enjoyment of all, and if hunters are killing grizzlies for trophies, instead of me being able to enjoy seeing living bears, hunters will be hanging bear skins on their wall. Bears do not belong on walls, they belong in the ecosystem. Wyoming has already started a public comment period, which ends of April 14, 2016, to begin a trophy hunt of grizzly bears. This does not show an intent to protect the bears and ensure their continued survival. Wyoming's management plan is just a road map to killing bears, and a copy of it it attached hereto.	Factor B	I strongly oppose the US FWS' proposal to delist the Yellowstone grizzly bear and strip the species' ESA protections. I am a third generation Wyomingite, and a US citizen. I am concerned that Wyoming sees the delisting proposal as an invitation to begin hunting the bears as trophies. The grizzly bears have the greatest value to Americans, and all the public, alive. The US FWS holds wildlife in the public trust for the enjoyment of all, and if hunters are killing grizzlies for trophies, instead of me being able to enjoy seeing living bears, hunters will be hanging bear skins on their wall. Bears do not belong on walls, they belong in the ecosystem. Wyoming has already started a public comment period, which ends of April 14, 2016, to begin a trophy hunt of grizzly bears. This does not show an intent to protect the bears and ensure their continued survival. Wyoming's management plan is just a road map to killing bears, and a copy of it it attached hereto. This management plan demonstrates how important it is to leave grizzlies on the endangered species list. The USFWS conclusions that climate change is not a threat to the bears, and will not be in the future, overlooks the scientific facts regarding the grizzly's food sources. All the grizzly bears' major food sources are in decline: the whitebark pine due to pine beetle infestation, an infestation caused by our warming world, the cutworm moth, and the cutthroat trout which are under threat from the invasive lake trout. The US FWS argues that there are alternate sources of food available to the grizzly bears, but has not shown any scientific data that would even begin to establish that those purported alternative sources of food have the necessary nutrition to meet the grizzly bears' dietary needs. In 2011 grizzly bears were placed back on the endangered species list because this agency failed to consider threats to the grizzly bears food sources, and that scientific uncertainty was not a sufficient rationale for failing to evaluate possible risks to a species the FWS proposed to delist and remove See, from ESA protections. See, Greater Yellowstone Coalition, Inc v. Servheen, 665 F.3d 1015, (9th Cir. 2011), a copy of which is also attached hereto. This holding of Greater Yellowstone Coalition, Inc. v. Servheen is still applicable today, as we continue to face the increased effects of global warming, and the grizzly bears' food sources continue to fall under that threat. The US FWS would be wise to review the Court's decision, and the scientific resources cited therein, before taking the rash action of delisting the grizzly bear. Instead of delisting the grizzly bear, the US FWS should be seeking areas to reestablish the grizzly populations, which is a goal that the US FWS cited in its 2011 status review of grizzly bears. Additionally, the US FWS cited in that same review, an expectation that the Continental Divide bears and the Yellowstone bears would naturally connect "in the near future", however, that will not come to pass if trophy hunters are allowed to kill bears that leave the national parks systems. The US FWS has these expectations based on outdated research, and without taking into consideration the massive detrimental effects a delisting will have on the grizzly bear population. If the delisting happens, bears that strike out in order to seek new ecosystems will leave the protections of the national parks, and be subject to hunting, ensuring that these brave bears cannot aid in the continued survival of the species. There are resources for the bears, and ecosystems to support them, but the bears will never get there if we allow hunters to kill the bears once they leave the national parks. There is no evidence that the current grizzly population in the Greater Yellowstone ecosystem is diverse enough to provide the required genetic diversity to support the continued survival of the species. The Yellowstone grizzly population has not connected with the Northern Continental Divide grizzly population, or the Cabinet-Yaak region grizzly bears. The current bear separate populations need the opportunity to reach each other in order to ensure continued genetic diversity, and if hunters are allowed to kill grizzly bears then the moment grizzlies step outside the national parks they will be subject to trophy hunting, making it even more difficult, if not impossible, for the different bear groups to reach each other. The reasons not to delist the grizzly bear are legion, and the US FWS should not proceed with this rule. Please keep the grizzly bear's protected status under the ESA. The continued survival of the grizzly depends on it.	FWS-R6-ES-2016-0042-0524	
Instead of delisting the grizzly bear, the US FWS should be seeking areas to reestablish the grizzly populations, which is a goal that the US FWS cited in its 2011 status review of grizzly bears. Additionally, the US FWS cited in that same review, an expectation that the Continental Divide bears and the Yellowstone bears would naturally connect "in the near future", however, that will not come to pass if trophy hunters are allowed to kill bears that leave the national parks systems. The US FWS has these expectations based on outdated research, and without taking into consideration the massive detrimental effects a delisting will have on the grizzly bear population. If the delisting happens, bears that strike out in order to seek new ecosystems will leave the protections of the national parks, and be subject to hunting, ensuring that these brave bears cannot aid in the continued survival of the species. 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The reasons not to delist the grizzly bear are legion, and the US FWS should not proceed with this rule. Please keep the grizzly bear's protected status under the ESA. The continued survival of the grizzly depends on it.	Factor B	I strongly oppose the US FWS' proposal to delist the Yellowstone grizzly bear and strip the species' ESA protections. I am a third generation Wyomingite, and a US citizen. I am concerned that Wyoming sees the delisting proposal as an invitation to begin hunting the bears as trophies. The grizzly bears have the greatest value to Americans, and all the public, alive. The US FWS holds wildlife in the public trust for the enjoyment of all, and if hunters are killing grizzlies for trophies, instead of me being able to enjoy seeing living bears, hunters will be hanging bear skins on their wall. Bears do not belong on walls, they belong in the ecosystem. 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The US FWS argues that there are alternate sources of food available to the grizzly bears, but has not shown any scientific data that would even begin to establish that those purported alternative sources of food have the necessary nutrition to meet the grizzly bears' dietary needs. In 2011 grizzly bears were placed back on the endangered species list because this agency failed to consider threats to the grizzly bears food sources, and that scientific uncertainty was not a sufficient rationale for failing to evaluate possible risks to a species the FWS proposed to delist and remove See, from ESA protections. See, Greater Yellowstone Coalition, Inc v. Servheen, 665 F.3d 1015, (9th Cir. 2011), a copy of which is also attached hereto. This holding of Greater Yellowstone Coalition, Inc. v. Servheen is still applicable today, as we continue to face the increased effects of global warming, and the grizzly bears' food sources continue to fall under that threat. 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If the delisting happens, bears that strike out in order to seek new ecosystems will leave the protections of the national parks, and be subject to hunting, ensuring that these brave bears cannot aid in the continued survival of the species. There are resources for the bears, and ecosystems to support them, but the bears will never get there if we allow hunters to kill the bears once they leave the national parks. There is no evidence that the current grizzly population in the Greater Yellowstone ecosystem is diverse enough to provide the required genetic diversity to support the continued survival of the species. The Yellowstone grizzly population has not connected with the Northern Continental Divide grizzly population, or the Cabinet-Yaak region grizzly bears. The current bear separate populations need the opportunity to reach each other in order to ensure continued genetic diversity, and if hunters are allowed to kill grizzly bears then the moment grizzlies step outside the national parks they will be subject to trophy hunting, making it even more difficult, if not impossible, for the different bear groups to reach each other. The reasons not to delist the grizzly bear are legion, and the US FWS should not proceed with this rule. Please keep the grizzly bear's protected status under the ESA. The continued survival of the grizzly depends on it.	FWS-R6-ES-2016-0042-0524	

If delisting occurs there will be pressures to allow trophy hunting and more pressure to kill nuisance bears. All of this will decrease the population numbers and will curtail any movement of bears of the GYE to those of the NCDE preventing any genetic carry over. It is not improbable then that up to 100 bears could be killed by such action of delisting; meaning any progress made would be short lived. Grizzlies of the GYE will become more isolated basically resigning this iconic bear to the status quo at best, which in and of itself is a death sentence unless bears would be placed back under protection on behalf of the ESA.	Factor B	See attached file(s). In the attached file, I have comments on the following docket number: Number FWS-R6-ES-2016-0042. Attachments Comments on Delisting Grizzly Bears.20160331	FWS-R6-ES-2016-0042-0540	
I oppose the sport hunting of grizzly bears please postpone grizzly bear hunting for at least 5 years post-delisting. Any future grizzly bear hunting should be very conservative, and should protect core habitat, female bears, cubs, and roadside bears that people see and love.	Factor B	I oppose the sport hunting of grizzly bears please postpone grizzly bear hunting for at least 5 years post-delisting. Any future grizzly bear hunting should be very conservative, and should protect core habitat, female bears, cubs, and roadside bears that people see and love. Please ensure that adequate funding for grizzly bear conservation is in place prior to removing Endangered Species protections.	FWS-R6-ES-2016-0042-0594	

I think that within the Grizzly Bear Recovery Area or Grizzly Bear Recovery Zone outside of Yellowstone Park of the Greater Yellowstone Ecosystem grizzlies should NOT be hunted because there's a very rare phase of the grizzly that lives there that is even more endangered, the Black Grizzly, also documented by Doug Peacock in a chapter of his book the Grizzly Years. These Black Grizzlies also live in Yellowstone. It's a similar situation to the white Spirit or Kermode black bears that are found and given protection from hunting in Canada. There are too few of these bears to sustain a hunt, I've only seen a handful of them, though a number of them do exist, documented by extensive video and photos by another professional wildlife photographer and author.	Factor B	First, I think that within the Grizzly Bear Recovery Area or Grizzly Bear Recovery Zone outside of Yellowstone Park of the Greater Yellowstone Ecosystem grizzlies should NOT be hunted because there's a very rare phase of the grizzly that lives there that is even more endangered, the Black Grizzly, also documented by Doug Peacock in a chapter of his book the Grizzly Years. These Black Grizzlies also live in Yellowstone. It's a similar situation to the white Spirit or Kermode black bears that are found and given protection from hunting in Canada. There are too few of these bears to sustain a hunt, I've only seen a handful of them, though a number of them do exist, documented by extensive video and photos by another professional wildlife photographer and author. Since the Taylor Fork Drainage of Montana is also critical springtime lower altitude habitat for grizzly bears, they should also not be hunted there (which is hopefully within the Grizzly Bear Recovery Area, or should be). The Interagency Grizzly Bear Study Team has been collaring and studying bears there for decades, and some of the bears that they have collared, at least one, is a black grizzly. Contrary to what they have said in the past, these bears are not dark brown, seen in cloudy conditions or backlit, they are black even in bright sun, without any of the silvertip of other grizzlies. I've seen very large male (larger than what is acknowledged publicly, absolutely enormous, though seldom seen), females, and cubs of this type. Presumably cubs are in especial danger of being mistaken for ursus americanus and hunted because they haven't developed adult grizzly characteristics. It should be noted that the Interagency Grizzly Bear Study Team has at least one of these bears collared, I believe, which I've witnessed. Their denial would not negate the existence of these bears, which also have been sighted within Yellowstone Park in two locations by me personally over the years, once in very good light over several days. Outside the park I've seen such an individual over many years. Also, although grizzlies used to frequent the Taylor Fork during the spring, last year I had no sightings whatsoever during this season in this critical habitat. Where there used to be grizzly digging activity evident everywhere, there was almost none. There could be several causes. Increased presence of hunters looking for Ursus Americanus during this season (there are none there anymore, there used to be a many years ago, a decade or more) which scared the grizzlies out of there too, the removal of cattle from summer grazing leases because of increased regulation around streams which might have messed up the ecosystem somehow, altering the vegetation so it's no longer favorable to the moles or gophers that the grizzlies used to subsist on during the spring (what look like moles collect caches of what look somewhat like ~~corn to birds underground, which the grizzlies excavate and presumably eat, along with the moles along~~	FWS-R6-ES-2016-0042-0599	
Habitat expansion and connectivity obstacles Immediate trophy hunting in all three states (Montana, Idaho, and Wyoming). With an estimated 717 bears-down from some 750 in 2014-conservationists advise a precautionary approach, particularly in light of the 55 conflict-related bear mortalities in the past year (and four orphaned cubs sent to zoos, bringing the loss of bears to 59), and the frighteningly low minimum population number of 600 proposed by the U.S. Fish & Wildlife Service.	Factor B	I am writing in OPPOSITION to the removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from ESA listing. Delisting the Greater Yellowstone grizzlies now would be premature. Key issues are: One of the slowest reproductive rates among land mammals, small average litter size, and long interval between litters Changes in the food supply: The whitebark pine forest is already 70-80% gone in the GYA due to non-native fungal disease and climate-driven bark beetle attacks; cutthroats have been all but wiped out by exotic lake trout (a deep-water fish unavailable to bears). Moths, which grizzlies eat by the pound, are subject to climate change and pesticides at lower elevations. This leaves meat-primarily elk-which bears shift to as other food sources disappear. More bears are dying as they increasingly use meat (livestock and hunter-killed carcasses) to replace traditional food sources, and come into more conflict with ranchers and hunters as a result." Habitat expansion and connectivity obstacles Immediate trophy hunting in all three states (Montana, Idaho, and Wyoming). With an estimated 717 bears-down from some 750 in 2014-conservationists advise a precautionary approach, particularly in light of the 55 conflict-related bear mortalities in the past year (and four orphaned cubs sent to zoos, bringing the loss of bears to 59), and the frighteningly low minimum population number of 600 proposed by the U.S. Fish & Wildlife Service.	FWS-R6-ES-2016-0042-0661	

Finally, all three states involved - Wyoming, Montana and Idaho - have indicated that they will allow a trophy hunting season of these bears once delisted. Americans overwhelmingly disapprove of trophy hunting and, because there is no buffer or even no hunt zone between Yellowstone and Grand Tetons national parks, it is likely that famous roadside bears who are tolerant of people would be the first killed. This would create a firestorm of public outrage and damage the thriving tourism economy of the region.	Factor B	I strongly oppose the delisting of the Greater Yellowstone Ecosystem grizzly bear. First, these bears are under threat from a changing climate. They have four primary food sources. Two of these - whitebark pine seeds and cutthroat trout - have been decimated in recent years by climate change. The third food source - moths - is unreliable due to expanded pesticide use. Despite this, the USFWS has stated that climate change has not and likely will not have any impact on GYE grizzlies. This makes no sense and, in light of the wolverine decision, must be reconsidered. As a result of declining food sources, the bears have switched to more meat which increasingly puts them in conflict with ranchers and other humans. These conflicts often lead to the offending bear's removal from the ecosystem and resulted in a record number of bears removed last year. Further, GYE grizzlies are genetically isolated from bears in the north and there are no plans allowing for connectivity, which is critical for long term survival of the species. Grizzlies occupy a tiny fraction of their historic range so it is difficult to consider them "recovered." Finally, all three states involved - Wyoming, Montana and Idaho - have indicated that they will allow a trophy hunting season of these bears once delisted. Americans overwhelmingly disapprove of trophy hunting and, because there is no buffer or even no hunt zone between Yellowstone and Grand Tetons national parks, it is likely that famous roadside bears who are tolerant of people would be the first killed. This would create a firestorm of public outrage and damage the thriving tourism economy of the region. For these reasons, I oppose delisting and urge the USFWS to reexamine the plan to delist to consider the impact of climate change.	FWS-R6-ES-2016-0042-0660	
I would expect that WY G&F would realize that 2/3 of the people are against hunting bears of any type for trophies. The value in the grizzly population within the YNP and GYE is in the tourist dollars that flood the state each years.	Factor B	Do not delist the Grizzly Bear within the Greater Yellowstone Ecocystem - they are just recovering. They need more time! I am a yearly (sometimes multiple times throughout the year) visitor to the beautiful state of Wyoming. Between 2015 and this year so far, I am finding it more difficult to support tourism and bring my family out from NH due to the continued disregard for apex predators/species in your state. To propose the delisting of the Grizzly bear is simply mind boggling. It seems that just as soon as a species has "recovered enough" that your G&F wants to institute open season. Grizzly bears are one of several iconic species, along with wolves and bison, of the Yellowstone National Park and it's entire ecosystem that often spans outside the park boundaries. I would expect that WY G&F would realize that 2/3 of the people are against hunting bears of any type for trophies. The value in the grizzly population within the YNP and GYE is in the tourist dollars that flood the state each years. With visits to YNP and other National Parks on the rise each years, the proposed delisting and subsequent hunt is simply ludicrous and goes against the majority of public opinion nationwide. Trophy Hunting is Not Cool and Disrespects the Animals Hunted! My kids have said that they would not like to go back to WY (or MT) or to Yellowstone if killing grizzlies becomes legal. Even my 14 yr. old twin boys understand the value of these bears and the impact they have on the ecosystem and the tourism. Most importantly, they don't believe in killing what you aren't intending to eat. Who's a Mama Bear? One of my other concerns is the killing of a mama bear. How will hunters be 100% able to distinguish a mama bear who is actively nursing and/or taking care of cubs? The won't. The chance of creating a who generation of orphaned cubs is quite high indeed. I find this possibility heartbreaking and needless. Hunters and trappers would probably call me a tree-hugger even though they don't know whether my family hunts or not; we do in fact but only deer or turkey (we are in NH) because these are animals that we can eat and that are in abundance. I ask that WY G&F take my comments, as a tourist - someone who spends thousands of dollars each year in WY - seriously and consider that I am not alone in opposing the delisting of the Grizzly Bear. If delisting occurs, the pressuer to open a hunt will be merciless and the hunting lobby unrelenting. Please. Now is not the time to delist Grizzlies! Thank You!	FWS-R6-ES-2016-0042-0723	

The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the, current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality.	Factor B	In an isolated, island ecosystem like Yellowstone, once the number of dead bears greatly exceeds the number of cubs born, you're headed toward extinction. Here are the current stats: The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the, current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality. Delisting the Yellowstone grizzlies will make them very easy for anyone to kill; without federal protection, their bearish lives will be made expendable. Another imperiled category of grizzlies are those who wander far from Yellowstone, attempting to link up with bear populations south of Glacier National Park. This connectivity is absolutely necessary for the longtime survival of Yellowstone's biologically-isolated grizzly bear population. Young male bears are often the first to begin this journey (which is essential for genetic viability), followed by female grizzlies whose presence constitutes true colonization of new habitats. Yet these bold, indispensable animals will be shot on sight. Global warming, which the FWS denies has any effect at all on the lives or futures of grizzlies, is in itself sufficient reason to never delist the Yellowstone grizzly. For one thing, the region can likely expect a terrifying drought. But climate change has already proven a disaster for grizzlies. For millennia, the park's grizzlies have fed on nuts from the whitebark pine. The nut is highly nutritious and mother grizzlies who eat pine nuts have more cubs and better survival rates. Whitebark pine forests grow at high elevations in remote places, and so serve to separate vulnerable young and mother bears from armed hunters at lower altitudes outside the park during hunting season.	FWS-R6-ES-2016-0042-0747	
Another imperiled category of grizzlies are those who wander far from Yellowstone, attempting to link up with bear populations south of Glacier National Park. This connectivity is absolutely necessary for the longtime survival of Yellowstone's biologically-isolated grizzly bear population. Young male bears are often the first to begin this journey (which is essential for genetic viability), followed by female grizzlies whose presence constitutes true colonization of new habitats. Yet these bold, indispensable animals will be shot on sight.	Factor B	In an isolated, island ecosystem like Yellowstone, once the number of dead bears greatly exceeds the number of cubs born, you're headed toward extinction. Here are the current stats: The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the, current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality. Delisting the Yellowstone grizzlies will make them very easy for anyone to kill; without federal protection, their bearish lives will be made expendable. Another imperiled category of grizzlies are those who wander far from Yellowstone, attempting to link up with bear populations south of Glacier National Park. This connectivity is absolutely necessary for the longtime survival of Yellowstone's biologically-isolated grizzly bear population. Young male bears are often the first to begin this journey (which is essential for genetic viability), followed by female grizzlies whose presence constitutes true colonization of new habitats. Yet these bold, indispensable animals will be shot on sight. Global warming, which the FWS denies has any effect at all on the lives or futures of grizzlies, is in itself sufficient reason to never delist the Yellowstone grizzly. For one thing, the region can likely expect a terrifying drought. But climate change has already proven a disaster for grizzlies. For millennia, the park's grizzlies have fed on nuts from the whitebark pine. The nut is highly nutritious and mother grizzlies who eat pine nuts have more cubs and better survival rates. Whitebark pine forests grow at high elevations in remote places, and so serve to separate vulnerable young and mother bears from armed hunters at lower altitudes outside the park during hunting season.	FWS-R6-ES-2016-0042-0747	

As human habitation threatens grizzlies' ability to successfully move between protected habitats (e.g., Yellowstone to grizzly-habitats south of Glacier National Park) it would be deeply wrong and tragic for FWS to make it easier for trophy-hunters to slaughter these apex predators for sport. Humans have encroached upon more than enough grizzly habitat.	Factor B	I strongly oppose delisting the Grizzlies who live in Yellowstone from the endangered/threatened wildlife list. These animals, the second-slowest reproducing land mammals on the North American continent, are deeply threatened already by the human activity that has led to climate change and drastically affected availability of the whitebark pine's nuts, which grizzlies have relied on for millenia. As human habitation threatens grizzlies' ability to successfully move between protected habitats (e.g., Yellowstone to grizzly-habitats south of Glacier National Park) it would be deeply wrong and tragic for FWS to make it easier for trophy-hunters to slaughter these apex predators for sport. Humans have encroached upon more than enough grizzly habitat. Do not permit those who want to hang grizzly heads on their walls or tramp on grizzly skin rugs to encroach further.	FWS-R6-ES-2016-0042-0762	
The iconic Yellowstone Grizzly Bear , the apex predator of that ecosystem, deserves continued long term protection. The present small population of 700 bears can not afford being hunted as it's in a closed ecosystem and needs a population which can find migration corridors to other habitats and systems, such as Glacier Park, The Bitterroot Selway and River of No Retun Wilderness areas to provided genetic diversity and healthy Grizzly populations.	Factor B	As a native born resident of Wyoming (born Casper-1950) I am very disturbed that the Fish and Wildlife would consider de-listing the Yellowstone Grizzly Bear. I am a hunter and fly-fisherman and I have spent my entire life visiting the park and surrounding wilderness areas. My three daughters have grown up camping in the Park and mountains there. In fact our frequent trips there, when they were children , were the cornerstone of their respect for Wilderness and Nature. The iconic Yellowstone Grizzly Bear , the apex predator of that ecosystem, deserves continued long term protection. The present small population of 700 bears can not afford being hunted as it's in a closed ecosystem and needs a population which can find migration corridors to other habitats and systems, such as Glacier Park, The Bitterroot Selway and River of No Retun Wilderness areas to provided genetic diversity and healthy Grizzly populations. For the FWS to say " Therefore , we conclude that the effects of climate change do not constitute a threat to the (Yellowstone Grizzly Bear) population now, nor are they anticipated in the future" is a gross misrepresentation of the actual facts and conditions in the park and surrounding ecosystems. Having spent my entire life in the area I have personally seen the effects of climate change on 95% of the White Bark Pine (their nuts being the important food supply for Grizzly Bears) from huge swaths of forest being attacked by Pine Beetle. Further, Yellowstone Cutthroat populations (Whirling Disease) not to mention the introduction of invasive Lake Trout have likewise effected the Grizzly Bear food supply. Epic droughts have caused mega catastrophic fires in the region which are a direct result of Climate Warming. These among many other examples are just a few of the issues which will effect the future of the Yellowstone Grizzly bear. The economics of a few hunting guides taking hunters, or independent hunters, using the areas surrounding the park are nothing compared to the economic engine of wildlife viewing in and around the park and the economic benefits from outdoor recreation for the towns and visitors coming to Yellowstone and the Grand Tetons. The Iconic Grizzly Bear is the face of Wilderness and of our National Parks. Do Not de-list the Yellowstone Grizzly Bear, this would be folly and the most damaging example of poor wildlife management.	FWS-R6-ES-2016-0042-0755	

The risks for the survival of the species increase when we consider that grizzlies are one of the slowest reproducing mammals. They typically do not reproduce until they are at least 4 or 5 years old. Grizzlies do not mate until the months between May and July. The female has to ensure that she gains enough weight during the summer so that the implantation of their eggs in the uterus occur between October and November. If she does not gain enough weight, the implantation may not occur. If the female is able to implant her eggs, then she will carry the cubs and give birth to an average of about 2-3 cubs. If hunting is made possible again there might be fewer grizzlies being born than the amount of number of grizzlies that are being killed.	Factor B	Delisting the grizzly bears of the Greater Yellowstone Ecosystem can cause harm to the species. It has taken decades for the species to increase from a population of just over a hundred, to around 700. The increase in the number of grizzly bears may seem substantial, but it does not compare to the amount of grizzlies that roamed before they began to be hunted in the 1800s. The grizzly bears should remain on the Endangered Species List until their numbers increase to an amount that can be considered self-sustaining. Removing them from the list at this point would require significant monitoring and regulations that are already being implemented by the Endangered Species Act. The risks for the survival of the species increase when we consider that grizzlies are one of the slowest reproducing mammals. They typically do not reproduce until they are at least 4 or 5 years old. Grizzlies do not mate until the months between May and July. The female has to ensure that she gains enough weight during the summer so that the implantation of their eggs in the uterus occur between October and November. If she does not gain enough weight, the implantation may not occur. If the female is able to implant her eggs, then she will carry the cubs and give birth to an average of about 2-3 cubs. If hunting is made possible again there might be fewer grizzlies being born than the amount of number of grizzlies that are being killed. By removing the grizzly bears from the list, we would be removing a dominant species in the ecosystem. Other parts of their ecosystem will be harmed. Grizzlies are known to be omnivore, which signifies that a major removal of the grizzly population may alter many different types of plants, which could then harm other wildlife that are part of this ecosystem. If the grizzlies can be hunted outside of the national parks, we are placing the grizzlies that live outside of the parks in danger. States like Montana, Idaho, and Wyoming would have to manage their hunting regulations. The individuals in the states might ignore rules and regulations, and this might cause the population of grizzlies to decline rapidly. We would then be left where we initially were, adding the grizzly bear species to the Endangered Species List. Instead, the communities that surround the living areas of the grizzlies should be educated about the importance of keeping this species alive. They should be educated about techniques that they can use when they come across grizzly bears. Once an animal is placed on the endangered species list, even if the animal population recovers to a certain degree, hunting it should not be allowed again.	FWS-R6-ES-2016-0042-0784	
If the grizzlies can be hunted outside of the national parks, we are placing the grizzlies that live outside of the parks in danger. States like Montana, Idaho, and Wyoming would have to manage their hunting regulations. The individuals in the states might ignore rules and regulations, and this might cause the population of grizzlies to decline rapidly. We would then be left where we initially were, adding the grizzly bear species to the Endangered Species List. Instead, the communities that surround the living areas of the grizzlies should be educated about the importance of keeping this species alive. They should be educated about techniques that they can use when they come across grizzly bears. Once an animal is placed on the endangered species list, even if the animal population recovers to a certain degree, hunting it should not be allowed again.	Factor B	Delisting the grizzly bears of the Greater Yellowstone Ecosystem can cause harm to the species. It has taken decades for the species to increase from a population of just over a hundred, to around 700. The increase in the number of grizzly bears may seem substantial, but it does not compare to the amount of grizzlies that roamed before they began to be hunted in the 1800s. The grizzly bears should remain on the Endangered Species List until their numbers increase to an amount that can be considered self-sustaining. Removing them from the list at this point would require significant monitoring and regulations that are already being implemented by the Endangered Species Act. The risks for the survival of the species increase when we consider that grizzlies are one of the slowest reproducing mammals. They typically do not reproduce until they are at least 4 or 5 years old. Grizzlies do not mate until the months between May and July. The female has to ensure that she gains enough weight during the summer so that the implantation of their eggs in the uterus occur between October and November. If she does not gain enough weight, the implantation may not occur. If the female is able to implant her eggs, then she will carry the cubs and give birth to an average of about 2-3 cubs. If hunting is made possible again there might be fewer grizzlies being born than the amount of number of grizzlies that are being killed. By removing the grizzly bears from the list, we would be removing a dominant species in the ecosystem. Other parts of their ecosystem will be harmed. Grizzlies are known to be omnivore, which signifies that a major removal of the grizzly population may alter many different types of plants, which could then harm other wildlife that are part of this ecosystem. If the grizzlies can be hunted outside of the national parks, we are placing the grizzlies that live outside of the parks in danger. States like Montana, Idaho, and Wyoming would have to manage their hunting regulations. The individuals in the states might ignore rules and regulations, and this might cause the population of grizzlies to decline rapidly. We would then be left where we initially were, adding the grizzly bear species to the Endangered Species List. Instead, the communities that surround the living areas of the grizzlies should be educated about the importance of keeping this species alive. They should be educated about techniques that they can use when they come across grizzly bears. Once an animal is placed on the endangered species list, even if the animal population recovers to a certain degree, hunting it should not be allowed again.	FWS-R6-ES-2016-0042-0784	

The grizzly bear as an apex predator has a complex role and provides necessary stability to the Yellowstone ecosystem. Reducing their numbers as rapidly as sport hunting allows also reduces the lack of genetic variability in the population since they are biologically isolated.	Factor B	I am deeply concerned about the considerations of FWS to remove the Yellowstone Grizzly Bear population from their Endangered Species status. I would ask that FWS please refer to the recent ruling by Judge Dana Christensen in that they "review the science on climate change for the wolverine", and apply that very same review to the Yellowstone Grizzly. Please consider that climate change already has and will continue to have a very real and threatening effect on the stability of the ecosystem where these great bears reside. The Whitebark Pine is a primary source of nutrition for the grizzly as they prepare for hibernation and we see this species of tree, as well as many others, have been decimated by blister rust and the pine beetle. We must take action at the earliest defensible time to protect against the loss of biodiversity and that time is now. The grizzly bear as an apex predator has a complex role and provides necessary stability to the Yellowstone ecosystem. Reducing their numbers as rapidly as sport hunting allows also reduces the lack of genetic variability in the population since they are biologically isolated. I am opposed to delisting the Grizzly bear from the Yellowstone Ecosystem. The grizzly is much more valuable than a trophy adornment on a wall or the floor. Thank you for your consideration.	FWS-R6-ES-2016-0042-0876	
The U.S. Fish and Wildlife Service are also part of the IGBC, whose mission statement says; " Work with others to conserve, protect and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people." However upon grizzly delisting the U.S. Fish and Wildlife Service is inclined to capitulate to "states rights" putting the future of grizzlies in the hands of those who find them a nuisance and expensive; hence, rendering their mission statement meaningless. We hold these grizzly truths to be self-evident; hence, for the Interagency Grizzly Bear Study Team's, team members, the Wyoming Game and Fish, Montana Game and fish and Idaho Game and Fish to institute a hunting season within the boundaries of the "Primary Conservation Area," not only would be reckless, it would be ludicrous! Let's not let this happen! FWS has it as their prerogative to make the PCA permanently off limits to hunting and should do so as a condition in the future delisting rule. Attachments trophy-verses-toursit-attraction	Factor B	The delisting of the Yellowstone Grizzly Bear is imminent and this we should celebrate ("dancing"). Now that our happy dance is complete, we must insure the grizzlies' recovery is permanent. To insure "continuity of achievement," the grizzlies need a firewall to protect the success of this achievement from human foible. Many will argue differently, but I believe that our "isolated" population of grizzlies has recovered; albeit tenuously, and I don't have a problem with the delisting. The problem is, as the delisting of the wolves demonstrated; a hunting season for grizzlies will soon follow. I believe a hunting season is a freight train coming at us we can't stop! Managing grizzly bears for the Game and Fish departments is expensive, and they desire to recoup some expense with grizzly bear hunting tags, but their real savings will be the killing of bears. All we can do is hope to mitigate the outcome by providing a firewall, a fall back zone where the grizzlies will never be hunted, an incubator of sorts. Social tolerance" is the term used by grizzly managers when considering the human factor intersect. Social acceptance is a tough sell for those who fear predators might hurt their children along the wildland-urban interface; grizzly advocates must understand this as we move forward with our mitigative efforts to insure a long-term grizzly recovery. If the residents on the outskirts of our towns and ranchers along the periphery of your National Forests can protect their property, social acceptance for grizzlies in our wild areas will grow. If people keep getting attacked outside Livingston, and grizzlies are harvesting apples in St. Anthony, or trying to den in garages in Driggs, social tolerance will shrink. We need to cultivate social tolerance, not risk it. My social tolerance for grizzlies is high because I have one of the 155+ easily discernable jobs created by grizzly bear tourism. I consider them "Revenue Bears," Game and Fish doesn't. Every hotel and restaurant of the Greater Yellowstone communities are beneficiaries of "Revenue Bear" tourism. I wish we wouldn't have a hunt, but as a pragmatist, I don't have a problem with a limited hunting season for the grizzly bears. Our Wyoming, Idaho and Montana Game and Fish departments who are also part of the IGBC, will argue that Yellowstone and Grand Teton Parks are the safety zone firewall that will protect the grizzlies. I counter point; if Yellowstone and Grand Teton Parks could protect them, why did the population crash to start with? That is why the alphabet soup of agencies of the IGBC in 1993 created the more logical and demonstrably effective "Grizzly Bear Recovery Zone"; known today as the "Primary Conservation Area (PCA)." The PCA has fostered the glacial pace yet successful recovery we enjoy today. This Primary Conservation Area is 9,210 square miles equaling 5,893,760 acres. This original "Grizzly Bear Recovery Zone" has to be the firewall "no hunting zone" to insure the "continuity of achievement" of the Grizzly Bear.	FWS-R6-ES-2016-0042-0787	

The ability to bring more hunting opportunities to the area would be great. it not only would add additional revenue for the state but as well to the local economy. This would also make it more affordable to hunters to hunt grizzly instead of having to hunt in the yukon or other areas such as this that become very expencive very quick.	Factor B	The delisting of the grizzly would be a great idea as there are many pros to this. The ability to bring more hunting opportunities to the area would be great. it not only would add additional revenue for the state but as well to the local economy. This would also make it more affordable to hunters to hunt grizzly instead of having to hunt in the yukon or other areas such as this that become very expencive very quick. I am all for this decision.	FWS-R6-ES-2016-0042-0900	
Delist them and let state wildlife managers manage them properly. Controlling the population with the aid of hunters is the best solution. It will generate more funds to help conservation.	Factor B	Delist them and let state wildlife managers manage them properly. Controlling the population with the aid of hunters is the best solution. It will generate more funds to help conservation.	FWS-R6-ES-2016-0042-1061	

Their population has reached a highly sustainable level as evident by their expansion form the core area and they have been more than effective in reducing ungulate numbers to a point they are not overgrazing their range, even in lean years. As with any wildlife, to truly protect a species such as grizzly, nothing is more effective than establishing a hunting season and harvest quota.	Factor B	As a citizen who watches wildlife and human interaction, I wholeheartedly support removing the greater Yellowstone ecosystem population of grizzly bears from the list of Endangered and Threatened wildlife. Their population has reached a highly sustainable level as evident by their expansion form the core area and they have been more than effective in reducing ungulate numbers to a point they are not overgrazing their range, even in lean years. As with any wildlife, to truly protect a species such as grizzly, nothing is more effective than establishing a hunting season and harvest quota.	FWS-R6-ES-2016-0042-1086	
Without regulated hunting to control the bear population, the Grizzly will become too numerous and be too much of a predator for other wildlife and humans.	Factor B	I am in favor of removing the Grizzly Bears from the endangered list in the Yellow Ecosystem and allowing states to manage all wildlife populations. The Grizzly Bear have flourished during their protection period and now will be able to be managed so as to have the bear population regulated to also protect other species. Funds derived from hunting licenses and fees will be used to support this effort. Without regulated hunting to control the bear population, the Grizzly will become too numerous and be too much of a predator for other wildlife and humans.	FWS-R6-ES-2016-0042-1099	

Just like elk, deer, moose, mountain lion and other wild game, Grizzly Bear (and wolves too for that matter) should be managed by the respective state game management entity so a balanced predator/prey environment can be more effectively achieved for the benefit of all species and the habitat they live in and live off of. This will also benefit the hunting community by allowing all game animals to have a better chance to thrive with balanced and sustainable numbers for all.	Factor B	As an avid hunter and outdoor activity proponent I very strongly support the delisting of Yellowstone Grizzly Bear so they can be managed like all wild game animals should be. Just like elk, deer, moose, mountain lion and other wild game, Grizzly Bear (and wolves too for that matter) should be managed by the respective state game management entity so a balanced predator/prey environment can be more effectively achieved for the benefit of all species and the habitat they live in and live off of. This will also benefit the hunting community by allowing all game animals to have a better chance to thrive with balanced and sustainable numbers for all. These decisions should NOT be left to animal rights activists as evidenced by how they have caused game and wildlife management problems with the introduction of grey wolves and thrown lawsuit after lawsuit in the way of state wildlife management agencies long after the previously agreed upon sustainable numbers had been reached. As a result of their overzealous actions to allow wolf populations to grow unchecked, these predators have since spread to many more states and areas that were not intended to have them, such as Oregon, Washington, Idaho and now even Colorado. The problems these unmanaged predators have caused to elk, deer, moose and other game animals, as well as the destruction of livestock by the wanton "sport hunting" wolves are known to perpetuate are too numerous to list here. That said, delisting Grizzly Bear and NOT allowing animal rights activists to prevent them from being properly managed should not be allowed or tolerated. If man is going to be involved in managing wildlife then excluding certain species, regardless of their being predator or prey, is just wrong. Man should either manage all or manage none. Managing none is not a wise choice based on history and the near wipe-out of species in our nation's early history. Hunters in general have become the conservationists with the most vested interest in preserving wildlife and raising money to do so. In contrast animal rights activists don't even come close.	FWS-R6-ES-2016-0042-1162	
In recent years, grizzly deaths have been increasing due to human/bear conflicts and changes in feeding habits which have put females and cubs in in banns way and also affects numbers killed in a year. Hunting, though regulated, will add to that number and will be curtailed if numbers drop below 600. However, there is always a lag before actual documentation can occur, and counts are not always accurate. After all the money spent to bring bears back to viable populations and with so many factors/trends still in flux, as well as the low reproduction of grizzlies in general, trophy hunting seems totally illogical yet will certainly be the outcome of delisting.	Factor B	See Attached Attachments Patten Eva	FWS-R6-ES-2016-0042-1227	

Grizzly bears are a premier wildlife attraction for visitors to YELL, GRTE and JODR; and those visitors bring tens of millions of dollars into the regionaleconomy. The bears contribute to the publicâ€™s enjoyment and sense of pride in our conservation heritage. We seek to ensure that any future grizzly bear harvests within the GYE be conducted in a manner that: 1) respects the NPS mission; 2) protects regional economic benefits and the enjoyment of bear watching; 3) reduces the risks associated with wounded bears entering NPS units; and 4) limits the likelihood thatwell-known or transboundary bears will be harvested.	Factor B	United States Department of the Interior 21-A» NATIONAL PARK SERVICE a€œ jaœœ A E INTERMOUNTAIN REGION A: i . , A» 12795 West Alameda Parkway Q.P.O. Box 25287 Denver, Colorado 80225-0287 ru REPLY REFER ro;May 10, 2016 VIA ELECTRONIC MAIL â€” NO HARD COPY TO FOLLOW MemorandumTo: Director, U.S. Fish & Wildlife Service From: Intermountain Regional Director, National Park Service Subject: NPS Comments on Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlde and Final Draft 2016 Conservation Strategy, Docket ID: FWS-R6â€”ES-2016-0042 The National Park Service (NPS) appreciates the opportunity to provide comments on the Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlye and the associated draft Conservation Strategy. The attached review comments were prepared by staff from Yellowstone National Park (YELL), Grand Teton National Park (GRTE), John D. Rockefeller Jr. Memorial Parkway (JODR), and NPS Regional and Washington Offices. NPS reviewers noted that the U.S. Fish and Wildlife Service (USFWS) has done an excellentjob of structuring the argument for delisting ofthe Greater Yellowstone Ecosystem (GYE) population of grizzly bears and that the state of the science is well presented. Upon delisting of the GYE grizzly bear, the states of Wyoming, Montana, and Idaho along with the NPS, U.S. Forest Service (USFS), Bureau of Land Management (BLM) and tribes will collectively co-manage this species and habitat within the identified Demographic Monitoring Area (DMA). This will require careful coordination and collaboration to effectively manage bears which do not recognize jurisdictional boundaries. The NPS is committed to working closely and collaboratively with the USFWS and our other partners to develop and implement a cooperative management framework for this wide-ranging species while recognizing and respecting each partnerâ€™s jurisdiction, mission, values and interests. The NPS continues to focus on supporting the delisting process while trying to ensure values of the NPS are considered in management strategies and actions. Grizzly bears are a premier wildlife attraction for visitors to YELL, GRTE and JODR; and those visitors bring tens of millions of dollars into the regional economy. The bears contribute to the publicâ€™s enjoyment and sense of pride in our conservation heritage. We seek to ensure that any future grizzly bear harvests within the GYE be conducted in a manner that: 1) respects the NPS mission; 2) protects regional economic benefits and the enjoyment of bear watching; 3) reduces the risks associated with wounded bears entering NPS units; and 4) limits the likelihood that well-known or transboundary bears will be harvested. The attached NPS comments on the Proposed Rule and draft	FWS-R6-ES-2016-0042-5325	
Those key issues include:1. If, after delisting, the decision is made to hunt grizzly bears, NPS is requesting that states focusthe majority of future grizzly bear harvests away from park boundaries. In addition, NPS is requesting that harvests be focused in areas where human-bear conflicts are prevalent.	Factor B	United States Department of the Interior 21-A» NATIONAL PARK SERVICE a€œ jaœœ A E INTERMOUNTAIN REGION A: i . , A» 12795 West Alameda Parkway Q.P.O. Box 25287 Denver, Colorado 80225-0287 ru REPLY REFER ro;May 10, 2016 VIA ELECTRONIC MAIL â€” NO HARD COPY TO FOLLOW MemorandumTo: Director, U.S. Fish & Wildlife Service From: Intermountain Regional Director, National Park Service Subject: NPS Comments on Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlde and Final Draft 2016 Conservation Strategy, Docket ID: FWS-R6â€”ES-2016-0042 The National Park Service (NPS) appreciates the opportunity to provide comments on the Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlye and the associated draft Conservation Strategy. The attached review comments were prepared by staff from Yellowstone National Park (YELL), Grand Teton National Park (GRTE), John D. Rockefeller Jr. Memorial Parkway (JODR), and NPS Regional and Washington Offices. NPS reviewers noted that the U.S. Fish and Wildlife Service (USFWS) has done an excellentjob of structuring the argument for delisting ofthe Greater Yellowstone Ecosystem (GYE) population of grizzly bears and that the state of the science is well presented. Upon delisting of the GYE grizzly bear, the states of Wyoming, Montana, and Idaho along with the NPS, U.S. Forest Service (USFS), Bureau of Land Management (BLM) and tribes will collectively co-manage this species and habitat within the identified Demographic Monitoring Area (DMA). This will require careful coordination and collaboration to effectively manage bears which do not recognize jurisdictional boundaries. The NPS is committed to working closely and collaboratively with the USFWS and our other partners to develop and implement a cooperative management framework for this wide-ranging species while recognizing and respecting each partnerâ€™s jurisdiction, mission, values and interests. The NPS continues to focus on supporting the delisting process while trying to ensure values of the NPS are considered in management strategies and actions. Grizzly bears are a premier wildlife attraction for visitors to YELL, GRTE and JODR; and those visitors bring tens of millions of dollars into the regional economy. The bears contribute to the publicâ€™s enjoyment and sense of pride in our conservation heritage. We seek to ensure that any future grizzly bear harvests within the GYE be conducted in a manner that: 1) respects the NPS mission; 2) protects regional economic benefits and the enjoyment of bear watching; 3) reduces the risks associated with wounded bears entering NPS units; and 4) limits the likelihood that well-known or transboundary bears will be harvested. The attached NPS comments on the Proposed Rule and draft	FWS-R6-ES-2016-0042-5325	

NPS is requesting that the Proposed Rule, Conservation Strategy, state management plans and other related documents identify the John D. Rockefeller, Jr. Memorial Parkway (JODR) as one of the three national park units in the GYE where hunting will not be permitted.	Factor B	United States Department of the Interior NATIONAL PARK SERVICE 12795 West Alameda Parkway P.O. Box 25287 Denver, Colorado 80225-0287 REPLY TO: May 10, 2016 VIA ELECTRONIC MAIL NO HARD COPY TO FOLLOW Memorandum To: Director, U.S. Fish & Wildlife Service From: Intermountain Regional Director, National Park Service Subject: NPS Comments on Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife and Final Draft 2016 Conservation Strategy, Docket ID: FWS-R6-ES-2016-0042 The National Park Service (NPS) appreciates the opportunity to provide comments on the Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife and the associated draft Conservation Strategy. The attached review comments were prepared by staff from Yellowstone National Park (YELL), Grand Teton National Park (GRTE), John D. Rockefeller Jr. Memorial Parkway (JODR), and NPS Regional and Washington Offices. NPS reviewers noted that the U.S. Fish and Wildlife Service (USFWS) has done an excellent job of structuring the argument for delisting of the Greater Yellowstone Ecosystem (GYE) population of grizzly bears and that the state of the science is well presented. Upon delisting of the GYE grizzly bear, the states of Wyoming, Montana, and Idaho along with the NPS, U.S. Forest Service (USFS), Bureau of Land Management (BLM) and tribes will collectively co-manage this species and habitat within the identified Demographic Monitoring Area (DMA). This will require careful coordination and collaboration to effectively manage bears which do not recognize jurisdictional boundaries. The NPS is committed to working closely and collaboratively with the USFWS and our other partners to develop and implement a cooperative management framework for this wide-ranging species while recognizing and respecting each partner's jurisdiction, mission, values and interests. The NPS continues to focus on supporting the delisting process while trying to ensure values of the NPS are considered in management strategies and actions. Grizzly bears are a premier wildlife attraction for visitors to YELL, GRTE and JODR; and those visitors bring tens of millions of dollars into the regional economy. The bears contribute to the public's enjoyment and sense of pride in our conservation heritage. We seek to ensure that any future grizzly bear harvests within the GYE be conducted in a manner that: 1) respects the NPS mission; 2) protects regional economic benefits and the enjoyment of bear watching; 3) reduces the risks associated with wounded bears entering NPS units; and 4) limits the likelihood that well-known or	FWS-R6-ES-2016-0042-5325	
Montana's plan is to charge only \$50 for in state licenses and a \$1,000 for out-of-state. These low costs will ensure their decimation, not to mention the fact that they are not used to being hunted making them an easy target. The time it takes for them to mature sexually and only reproduce every two to three years will greatly increase their reduction should de-listing occur.	Factor B	It is with great sadness and frustration to hear about the possible de-listing of grizzly bears in the Greater Yellowstone eco-system. First I would like to address the issue from the perspective of a native of Wyoming. My life began on a large ranch nestled along the Beartooth Mountains reaching into Sunlight Basin north of Cody, WY close to the Montana border. During my childhood, I encountered an extraordinary plethora of wildlife including the grizzly. My parents taught me the value and necessity of living with, not against nature. In order for humanity to have a connection to the earth, there must be respect and love for all things wild and free. Predation was a part of doing business as a rancher and if you were not smart enough or creative enough to deal with predators, then you had no business being a rancher. And true to their wisdom, we experienced very little predation. More livestock was lost to injury and illness than wildlife predation. Throughout all my childhood years, I learned to understand wildlife and respect their ways. Ultimately learning how to alter my own behavior in order to interact safely. Not a hardship, sometimes a short delay or detour, but nothing that would ever cause my parents a willingness to take the life of a bear, coyote, cougar, bobcat, fox, etc. for convenience's sake. Fast forward to my life as a wildlife biologist and it is with a grateful heart that they taught me the value of all nature and it's ways. It is from their lifelong commitment to harmony, balance, and respect for all life that I long to protect the last vestiges of the wild. It is poor science that calls for the slaughter of these magnificent creatures. And slaughter it will be. Montana's plan is to charge only \$50 for in state licenses and a \$1,000 for out-of-state. These low costs will ensure their decimation, not to mention the fact that they are not used to being hunted making them an easy target. The time it takes for them to mature sexually and only reproduce every two to three years will greatly increase their reduction should de-listing occur. Their value is far greater alive than on someone's wall or under their feet. I recall a funny comment made to Yellowstone rangers about training the bears better so that visitors will be able to see them. Not so funny when you think about how much money wildlife engenders for the park and the surrounding businesses. And bears are iconic, everyone who enters a park where they remain wish to see one and to feel their wildness. There is no good reason to de-list these bears and especially not for political maneuvering. It is our responsibility, collectively to keep these icons safe. As anyone who works in science and law enforcement can tell you, the amount of "Shoot, shovel, and shut up," has an already significant impact in every aspect of wildlife. We must not allow the wanton destruction of grizzlies a further opportunity to take hold. Stand firm in choosing to retain the grizzly on the endangered species list where they at least have some protection.	FWS-R6-ES-2016-0042-5376	

If protections are lifted, they will surely be exterminated by people who will flock from all over the world for trophy hunting.	Factor B	Please keep protections for all 650 Grizzly Bears that remain in the Yellowstone area. If protections are lifted, they will surely be exterminated by people who will flock from all over the world for trophy hunting. Grizzlies have low reproductive rates, and are already feeling pressures from habitat fragmentation, human pressures, and a decline in their food sources such as wild ungulates, fish and other prey species. If protections are lifted, they will inevitably be pushed to the brink of extinction. They have already been exterminated from 95% of their historic range, and instead of de-listing, more studies should be done to allow them to occupy their historic range. Due to human pressures, Grizzlies are already confined to the "recovery ecosystems" if protections are removed, Yellowstone bears could be confined to extinction within our lifetimes. A Grizzly gallbladder can sell for up to \$10,000 on the black market, and the larger the gallbladder, the higher the price and in Korea, as much as \$15,000. The demand for people to kill them is extremely high and with only a few isolated populations these bears need to be protected and allowed to roam free without fear of being killed. In the Salmon River Watershed in California, one large family decimated a bear population by killing more than 200 bears (likely for the gall bladders) in one season. "It's hard for any enforcement agency to get a handle on wildlife crime. Unlike crimes against people (who report them), you usually have to catch a poacher or trafficker in the act," said Sandy Cleva, spokesperson for the U.S. Fish and Wildlife Service's Office of Law Enforcement. Please extend the comment period so that we can adequately study and offer better solutions for increasing biodiversity during this time of one of the largest extinctions on the face of the planet.	FWS-R6-ES-2016-0042-1247	
The current (and future) environmental pressure the bears face due to climate change are already highly problematic for these animals. If these conditions continue - or worsen- as they are expected to do, the bears will most likely be forced to leave the confines of their protected area to search out additional food sources. Once outside the park they will have no protections and will be fair game for anyone who wants a trophy.	Factor B	I am speaking out against the delisting of grizzlies for a number of reasons. Of most concern is that once the animals are delisted they will be open to truly unsustainable hunting pressures. Why do I say this? The current (and future) environmental pressure the bears face due to climate change are already highly problematic for these animals. If these conditions continue - or worsen- as they are expected to do, the bears will most likely be forced to leave the confines of their protected area to search out additional food sources. Once outside the park they will have no protections and will be fair game for anyone who wants a trophy. This is a disaster waiting to happen: Hunting is indiscriminate - it is difficult, if not impossible, for most hunters to determine male from female, or to insure that they are not destroying robust animals in their reproductive prime. Do we know how the sex ratio needed to sustain a viable population will be altered as a result of new hunting pressures? And if hunters take reproductively mature individuals the outcomes are obvious: grizzlies have a slow reproductive rate and also take many years to reach reproductive maturity. The idea that this population of only 700 or so bears can sustain the pressures they would face upon delisting is doubtful at best and certainly requires more study. On this alone delisting should not be considered an option at this time; and unless the delisting is done for the benefit of the grizzlies themselves, and for the overall integrity and health of the Yellowstone ecosystem, then the option to delist should be abandoned completely. Thank you for your consideration.	FWS-R6-ES-2016-0042-5372	

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Their numbers are still low, their diet is disrupted by climate change. Living in a park makes them unwary of people and therefore easy marksfor hunters.	Factor B	Please DO NOT delist grizzly bears at Yellowstone as an endangered species! Maintain Federal Protection and do not allow them to be exposed to trophy hunting! Their numbers are still low, their diet is disrupted by climate change. Living in a park makes them unwary of people and therefore easy marks for hunters. LET BEARS PERSIST! DO NOT DELIST!	FWS-R6-ES-2016-0042-1286	
It is particularly objectionable to delist a species we've invested so much in to maintain genetic diversity and while evaluating the reintroduction into the North Cascades with a primary outcome being the issuance of trophy hunting permits which provides no one essential resource to human survival.	Factor B	I am writing to object to the proposed removal of the Greater Yellowstone Ecosystem Popilation of Grizzly Bears from the Federal List of Endangered Species. Given uncertainty in larger ecosystem functions due to climate change, real uncertainty about survival of critical plant species for the survival of grizzlies, continued fragmentation of habitat from development, significant and ongoing potential for unforeseen disease striking a small and fragmented species, (e.g. Whitnose bat syndrome) it is inappropriate to delist a long lived, slowly reproducing species which survives in a much diminished and fragmented habitat range. It is particularly objectionable to delist a species we've invested so much in to maintain genetic diversity and while evaluating the reintroduction into the North Cascades with a primary outcome being the issuance of trophy hunting permits which provides no one essential resource to human survival. Retaining this species in healthy population numbers sufficient to withstand changing future conditions we cannot predict is our generational obligation. I urge the USFWS to not delist the Yellowstone Grizzly.	FWS-R6-ES-2016-0042-1271	

Over 68% of Americans, polled so far, are opposed to trophy hunting. Over 25 different Native American Tribal Councils have spoken against the proposal to delist the Sacred Bear. The killing of Cecil the Lion, and resultant demonstrations, proved that the World is opposed to trophy hunting. The surrounding states of the Greater Yellowstone Ecosystem, have already made plans to hunt the bears. The estimated amount of revenues the states anticipate receiving, from the sale of licenses and tags, is far less than the multi million dollar, renewable resource, tourism industry of the GYE.	Factor B	I oppose delisting the Grizzly. It took over 50 years of protections and millions of our Tax dollars, to recover the bear to only 2% of it's historic range, far below acceptable standards, according to ESA protocols for delisting. And the population is only an estimate. The 3 year study, supporting this proposition, which has never been made available to PEER Review or the American Public with adequate amount of time to evaluate and make comment, is very questionable in validity, due to being opaque from view and rushed through, despite requests for such information and time. Over 68% of Americans, polled so far, are opposed to trophy hunting. Over 25 different Native American Tribal Councils have spoken against the proposal to delist the Sacred Bear. The killing of Cecil the Lion, and resultant demonstrations, proved that the World is opposed to trophy hunting. The surrounding states of the Greater Yellowstone Ecosystem, have already made plans to hunt the bears. The estimated amount of revenues the states anticipate receiving, from the sale of licenses and tags, is far less than the multi million dollar, renewable resource, tourism industry of the GYE. Yellowstone is a World Heritage Site, so the World has a valid voice in this, as well. Both Superintendents, of Yellowstone and Grand Teton National Parks, have publicly stated opposition to delisting, basing their positions on all factors involved, including the science from the experts in the field where this proposal would directly effect. A 2014 published study, conducted by USGS and NPS Interagency Grizzly Bear Study Team, titled, "The Economics of Roadside Bear Viewing," determined: 1)if bears were no longer visible along roadsides, visitation would decrease, resulting in 155 jobs lost in the local economy; 2) they determined through guest surveys, people are willing to pay around \$41 more in Park Entrance fees, to ensure that Bears are allowed to remain along roadsides. I work in Yellowstone and make Reservations for guests. The most frequently asked questions I receive are: 1)where do I find Wolves; 2)where do I find Bears; 3)when does Old Faithful erupt, in this order. We do not have fencing around the Parks to protect the animals from leaving the safety from hunting and trapping that occurs just outside the boundaries. It's well documented that any lack of biodiversity of genes in any species, will ultimately result in genetic flaws and eventual extinctions. To not have protections to allow travel between the National Parks of the the Northern Rockies and beyond, will effectively restrict biodiversity and jeopardize viability of the Grizzly in the future. Bears need lots of space and are the 2nd slowest mammal on Earth, to reproduce, often taking years to recover from any disruption in it's environment. We live at a time what scientists call the 6th Major Extinction on Earth, loosing more species in the last century, than any other time in most of Earth's history. We do not want to loose any more and I fear that a rushed decision is not	FWS-R6-ES-2016-0042-1298	
Regardless of whether bears are protected by the Endangered Species Act, more must be done to prevent conflicts with hunters and ranching operations in order to protect bears, people and livestock. Too many bears are being killed by hunters and outfitters and many times it appears deliberate. Â	Factor B	The Conservation Congress does not support the delisting of the Grizzly Bear from the GYE. This appears to be a politically motivated decision and should be abandoned. Below are key points why grizzlies should not be delisted. The proposal to remove Yellowstone grizzly bears from the endangered species list fails to preserve the progress made toward bear recovery. In fact, it will reverse it, as the proposal will allow the number of bears to be immediately reduced, including through trophy hunts. More than 100 bears could be killed, putting the population in jeopardy, before hunting could be temporarily stopped. The end result of this plan will be fewer bears limited to an even smaller portion of the Yellowstone region. Given how slowly bears reproduce, the current proposal to allow states to exceed the maximum number of bear deaths for several years before even initiating a review could mean that the population is in steep decline before any emergency action can be taken. Though bears will have some measure of protection within the national parks, once they range outside the park boundaries they will be at the mercy of hostile state management policies. Leaving management completely up to the states outside the national parks will also mean that bears could be totally eliminated in certain regions, which could be particularly harmful to their ability to connect and reproduce with bears from other areas or recolonize large existing wild areas where they historically roamed. People and bears can co-exist. We should not let bears slide back towards extinction because of misplaced political hostility towards these magnificent and beloved beings. Regardless of whether bears are protected by the Endangered Species Act, more must be done to prevent conflicts with hunters and ranching operations in order to protect bears, people and livestock. Too many bears are being killed by hunters and outfitters and many times it appears deliberate. . States are not prepared or qualified to manage grizzly bears. They have a bias towards hunters who provide revenue and are not dedicated to the preservation of T&E species. This can be seen in the gray wolf and recent wolverine listing decision. States also disrespect the interests of non-hunters such as tribes and wildlife watchers. . The USFWS appears to be hiding the data on how grizzly bears are doing in the GYE. This is public information and should be released.	FWS-R6-ES-2016-0042-1318	

State priorities will be permitting of trophy hunting and the protection of livestock, not the creation of protected corridors for the movement of this iconic species.	Factor B	See Attached Attachments Dickinson Sarah	FWS-R6-ES-2016-0042-1349	
HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. These states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains.	Factor B	Do NOT delist the Yellowstone Grizzlies! - THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - DECLINING FOOD SOURCES: Historically bears dependent on 4 food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. These states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. - GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. Sow's will be killed and Cubs left to starve or be killed by predators. Don't delist the Grizzlies. Too many of them are being killed even with protection. There is no reason to delist them. Do you really want the states to lose millions of tourist dollars? That's what will happen because millions of people come to the Tetons and Yellowstone to see the Grizzlies. If they are hunted they won't be seen in the parks like they are now. To delist them is totally wrong on so many levels.	FWS-R6-ES-2016-0042-1366	

Due to the extreme hostility towards wildlife predators, Wyoming's treatment of other delisted predators, namely wolves, and state policies allow wolves to be killed for any reason over 85% of the state. In the latest grizzly recovery plan, the bears are strictly protected in the core of the park, but there are very liberal hunting policies just barely outside the park and lethal control if they encounter livestock on public lands.	Factor B	Grizzly bears in the Greater Yellowstone Ecosystem have benefited greatly from ESA protections but are not even close to fully recovered in the area, and are very vulnerable. It has taken 40 years of protections to get the population where it is. Losing ESA protections means they would be immediately hunted Grizzlyhunters, which would set population numbers in an immediate decline. The USFWS proposal to delist the grizzly not only puts a stop to this recovery, it will quickly QUICKLY reverse it. This would turn management of this iconic species over to the states and subject these animals to trophy hunting seasons in Montana, Idaho and Wyoming. Removing federal protections from this one small, isolated population and immediately hunting them will likely start an immediate decline back towards extinction. We do not recover species from the ESA, to delist and immediately begin hunting them. This is not the intention of the Endangered Species Act. The ESA is not a game farm plan. The purpose of the ESA is to protect and recover imperiled species and the ecosystems upon which they depend. It was designed to protect critically imperiled species from extinction as a "consequence of economic growth and development untempered by adequate concern and conservation." The U.S. Supreme Court found that "the plain intent of Congress in enacting" the ESA "was to halt and reverse the trend toward species extinction, whatever the cost. To delist species, several factors are considered: the threats are eliminated or controlled, population size and growth, and the stability of habitat quality and quantity. The threats are not eliminated nor controlled, but greater than ever. Habitat quality and quantity are currently unstable, and further unsustainable if delisted. The direct and indirect threats to the grizzly are enormous. The loss of key food sources due to climate change, slow reproductive rates, and the fact that the state plans to "manage" and "reduce" numbers through trophy hunts guarantee an unsustainable future for the species. The American public overwhelmingly wants grizzly bears protected for future generations, not killed by a few trophy hunters. Grizzly bears are a wildlife icon that have been a part of the American West and been integral to the Yellowstone region for centuries. Each year, visitors spend millions in the region, hoping to catch a glimpse of a grizzly, this beautiful and powerful symbol of our wild heritage. And as an apex predator, their presence is crucial to the health of wildlife in the Greater Yellowstone region. If the delisting goes through, the very states Wyoming, Montana, and Idaho that had their management authority over grizzlies taken away for failing to keep their populations healthy will again assume primary custodial care. Due to the extreme hostility towards wildlife predators, Wyoming's treatment of other delisted predators, namely wolves, and state policies allow wolves to be killed for any reason over 85% of the state. In	FWS-R6-ES-2016-0042-1424	
Delisting will kill 200 bears out of the 700 in the first year. This is unacceptable and unsustainable.	Factor B	Do not delist the Grizzly bear for the following reasons. 1. FWS's mission is to protect wildlife, not delist. 2. The delisting will result in condemning the Grizzly to certain slaughter. 3. Climate change has decimated the pine nuts and wrecked havoc on the food sources despite what reports say. 4. Delisting is a death warrant for countless bears. 5. Obsolete methods of counting the bears are being used in jeopardy of good science. 6. This is a violation of ethics to destroy an iconic species that draws many dollars to the tri state area. Also, FWC has the obligation to protect, not sanction the killing of these magnificent creatures. They are a vital part of the West. 7. This apex predator plays a vital role. The reintroduction of the wolf in Yellowstone was a huge positive influence. 8. The 59 listed kills in 2015 is actually about half the actual kills. 9. Delisting will kill 200 bears out of the 700 in the first year. This is unacceptable and unsustainable. 10. FWC is losing credibility nationally for doing just this type of wildlife "management" which factors into "takes" that is only sugar coats the slaughter that results. 11. The ranching, hunting, grazing and other special interest groups are being overly patronized to via these unsound, lack of scientific decisions that destroy a species that many resources have gone into preserving & protecting. Do the right thing and don't even think about this ridiculous, tragic proposal that leave FWC with still another ill conceived decision that will forever taint your legacy. Thank you for the consideration. Show some vision and stand your ground.	FWS-R6-ES-2016-0042-1512	

So why not let the numbers grow to a few thousand 3-4 then put a no hunting zone around every park that has GB in it of at least 30-50 miles. THERE IS NO REASON TO BE HUNTING GRIZZLY BEARS IN THE LOWER 48 AT THIS TIME!!!!!! AND FOR SURE NOT IN ARE CLOSE TO A PARK!!!!!!!!!!!!!!	Factor B	I've been a hunter and guide for over 35 years. my whole family hunts and passed have hunted our whole life's. But i don't see any reason to be hunting grizzly bears with such a low number in the lower 48. We spend 4-6 weeks in and around yellowstone every year for the past 10 years and i can tell you there is not a GB around every corner. There are trips that we never see a GB and we spend a lot of time looking. With the number being so low and being they reproduce at such a slow rate if there was as disease to hit them the number could fall to super low!!!!!! So why not let the numbers grow to a few thousand 3-4 then put a no hunting zone around every park that has GB in it of at least 30-50 miles. THERE IS NO REASON TO BE HUNTING GRIZZLY BEARS IN THE LOWER 48 AT THIS TIME!!!!!! AND FOR SURE NOT IN ARE CLOSE TO A PARK!!!!!!!!!!!!!!	FWS-R6-ES-2016-0042-1563	
3. The final concern I have is that a delisted bear will be managed by the state, which will almost certainly involve trophy hunting. Trophy hunting, by definition, is not intended to supply an individual with meat nor is it intended to benefit the animal in anyway; it is only meant to stroke the ego of the hunter (the state claims economic benefits of this practice)-further reinforcing the mentality of dominance over nature that has driven too many management decisions in the past. Let wildlife watching and seeking the 'wilderness' experience drive the economic benefits derived from grizzly, not their further demise. Trophy hunting an animal like the grizzly bear will also create bad repertoire with the animal, instead of respect and reverence. These are the three factors driving my opinion that we are not ready to delist the Yellowstone grizzly bear population.	Factor B	As a resident of the Greater Yellowstone Ecosystem and naturalist instructor for Yellowstone National Park, I am concerned about the potential of removing the grizzly bear from the Threatened List under the ESA. My concerns are three fold: 1. The complete lack of genetic flow into the GYE will only result in the loss of allelic diversity in the future. Allele diversity is the key to adaptation, adaptation that will be required in the face of a changing climate, and therefore changing diet regime. Lack of genetic diversity is also the road to which we arrive at genetic bottle necks which will invariably result in lower reproductive rates, lower survival rates, and ultimately driving down population numbers. We ought to strive for genetic connectivity with other populations of grizzly bears so as to not negate the past several decades worth of conservation efforts. 2. Delisting would also send a message to the public that pathetically low population numbers and range occupation is 'good enough' for the grizzly bear and potentially other organisms. What I mean exactly is that the ESA gives us legal scaffolding to compare current habitat occupation and population numbers with historic levels in order to determine candidacy for protection. While great work has been done for grizzlies, they still only reflect a fraction of historic levels. I am not endorsing we have grizzlies occupy 100% of historic range, but there is space and tolerance for grizzlies that is not filled. Let us make sure if we are delisting these animals we have set them up for success, not damned them to a zoo-like fate restricted only to our parks and surrounding areas. 3. The final concern I have is that a delisted bear will be managed by the state, which will almost certainly involve trophy hunting. Trophy hunting, by definition, is not intended to supply an individual with meat nor is it intended to benefit the animal in anyway; it is only meant to stroke the ego of the hunter (the state claims economic benefits of this practice)-further reinforcing the mentality of dominance over nature that has driven too many management decisions in the past. Let wildlife watching and seeking the 'wilderness' experience drive the economic benefits derived from grizzly, not their further demise. Trophy hunting an animal like the grizzly bear will also create bad repertoire with the animal, instead of respect and reverence. These are the three factors driving my opinion that we are not ready to delist the Yellowstone grizzly bear population.	FWS-R6-ES-2016-0042-1576	

The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone.	Factor B	FWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. But no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claims that the shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. But this is not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. But under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. FWS claims that the agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. But when David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS claims that Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. But this approach is as	FWS-R6-ES-2016-0042-1611	
. However, what must, and should, be emphasized is the fact that the grizzly bear population increases at a slower rate when the whitebark seed is scarce. It is well documented that good whitebark cone crops decrease grizzly mortality and increase the number of bear cubs per litter. For Grizzlies, one of the world's slowest-reproducing mammals, this issue cannot be ignored when considering delisting this iconic species.	Factor B	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530	

The more important point, though, is that these bears are being killed in record numbers EVEN WITH PROTECTIONS IN PLACE.	Factor B	Please do not remove Endangered Species Act protections from the grizzly bears of the Greater Yellowstone Ecosystem. These bears are at great risk from climate change, human conflict and a slow reproductive rate. First, temperatures in Yellowstone already 1.4F higher they were last century. Because of those rising temperatures, we have seen a massive decline (up to 95%) in whitebark pine seeds. This is one of four important food sources for the bears and particularly impacts mother bears. If this is what 1.4 degrees has done, what will happen as temperatures continue to rise. We simply don't know and therefore should proceed carefully. Second, a record number of bears died last year even while protected. Many of these occurred due to some human conflict - hunters, livestock operations etc. Indeed, just this week, the wildlife loving community was shocked to learn that an elk hunter killed famous Bear 299 (Scarface) last November. Why this information was withheld for so long makes one wonder. The more important point, though, is that these bears are being killed in record numbers EVEN WITH PROTECTIONS IN PLACE. Why on earth, with this escalated decline, would we remove protections at this time. Finally, grizzlies have one of the slowest reproductive rates in North America. A dramatic population decline could happen quite quickly if a few mother bears are killed. I agree with the majority of scientific experts on the grizzly delisting. "An Ohio State University master's student, Harmony Szarek, found in her thesis that nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act." Most experts do not think these bears should be delisted. Most Americans (55% according to United States Humane Society) agree. Listen to the scientific experts. Listen to the people. Don't Delist Grizzly Bears!	FWS-R6-ES-2016-0042-1644	
ust as disturbing, in the 21st century with our vast knowledge and technology; our ability to resolve bear-human conflicts with viable non-lethal alternatives available, trophy hunting is unjustifiable and ethically repugnant.	Factor B	As an American taxpayer gravely concerned with thriving biodiversity, I oppose delisting and trophy hunting as a management plan. Grizzly bear habitat protections and demographic standards are too limited in geographic scope, and after more than 40 long years for the species to recover, the last thing we should do is delist them from federal protections and hand them over to the states. The draft delisting rule and conservation strategy does not fulfill adequate protections once grizzlies are removed from federal protections. Just as disturbing, in the 21st century with our vast knowledge and technology; our ability to resolve bear-human conflicts with viable non-lethal alternatives available, trophy hunting is unjustifiable and ethically repugnant. Millions of Americans, and international tourists, spend a lot of money, to travel to Yellowstone and Grand Teton National Parks, for the chance to view wildlife, and it's fiscally irresponsible and abhorrent to even propose hunting these magnificent and conservation-sensitive animals.	FWS-R6-ES-2016-0042-1656	

Grizzlies do not produce as quickly as other species, hunters will kill the young and most likely the sows (mothers). Unlike predators that seek out the weak and sick, "Hunters" will also seek out the best & healthiest specimens to kill and "proudly" display and brag of their murder. They will bait or lure them from the park, either by themselves or with the help of outfitters to kill. The population will be back to endangered status in no time and the very animals such as grizzlies and wolves that people come to see - will once again be extinct. PLEASE for once, listen to what the American people say - NOT the Koch brothers, the oil companies and other big corporate interests!! Do what our founding fathers would have and REPRESENT the American people for once!!	Factor B	I oppose delisting the Greater Yellowstone Grizzly population. These majestic animals belong, are needed for a healthy eco-system and deserve our protection on their land!! Grizzlies do not produce as quickly as other species, hunters will kill the young and most likely the sows (mothers). Unlike predators that seek out the weak and sick, "Hunters" will also seek out the best & healthiest specimens to kill and "proudly" display and brag of their murder. They will bait or lure them from the park, either by themselves or with the help of outfitters to kill. The population will be back to endangered status in no time and the very animals such as grizzlies and wolves that people come to see - will once again be extinct. PLEASE for once, listen to what the American people say - NOT the Koch brothers, the oil companies and other big corporate interests!! Do what our founding fathers would have and REPRESENT the American people for once!! DO NOT DELIST Grizzlies. Thank you!!	FWS-R6-ES-2016-0042-1655	
Maybe people feel like they are more protected when they are on the list. Maybe they are forgetting that these bears live in Yellowstone where there is no hunting.	Factor B	See attached file(s) Attachments Delist the Grizzly	FWS-R6-ES-2016-0042-1716	

Under the current proposal, hunting could also occur on lands directly adjacent to national parks as well as in key habitat that could link Yellowstone's grizzly bears to grizzlies from Glacier National Park	Factor B	It took decades of hard work and millions of taxpayer dollars to restore the southernmost population of grizzly bears in North America, and we must ensure these bears continue to thrive. NPCA believes the Fish and Wildlife Service proposal is incomplete and therefore currently fails to provide adequate information to support such a monumental decision. We are also extremely concerned that the National Park Service has not been adequately involved in the development of the proposal. NPCA is also extremely concerned that the Fish and Wildlife Service's proposal could allow hunting on private and state-owned land inside Grand Teton National Park and within the John D. Rockefeller Parkway. Under the current proposal, hunting could also occur on lands directly adjacent to national parks as well as in key habitat that could link Yellowstone's grizzly bears to grizzlies from Glacier National Park.	FWS-R6-ES-2016-0042-1711	
You guys are just going to cave to the cattle industry, waning hunting clubs, gas and oil conglomerates and hateful, uneducated trophy hunters who just want to fight the system and kill everything for a head to hang on their wall and a rug to walk all over on their floor. Like they are king of the hill. They don't know how to share the miracle of nature, they have to dominate it.	Factor B	DELISTING THE GRIZZLY NOW IS NOT RESPONSIBLE! Strike #1: Grizzlies depend on four food sources of which three are unreliable do to climate change. More studies need to be done. Strike #2: The proposed rule does not address the genetic isolation of the population in the GYE and there are no plans for more wildlife corridors making connectivity impossible. Strike #3: If grizzly management goes to the states, bears will be relentlessly hunted, reversing any population gains that have been made while on the ESL. Strike #4: Grizzlies are slow reproducing mammals and this could be devastating for the population when hunters claim innocence when they accidentally shoot sows and sows with cubs. And there are many more obstacles hindering healthy bear populations. They only occupy 1% of their historic range. Why can't we give them that? Do we have to destroy all wild grizzly populations? It is a small few who want to see these iconic, majestic bears destroyed, hunted as trophies, but a much greater percentage of US citizens who are signing petitions, writing editorials, posting their displeasure about delisting on social media. PAY ATTENTION TO THE PEOPLE! THEY ARE ANGRY WITH THE DECISION TO DELIST. JUST READ THE COMMENTS! Do you not see the economics of wildlife watching? I visit the GYE at least five times a year to see wildlife and on the top of my list is the grizzly bear. If I was to stop visiting the communities (AND BRINGING MY CLIENTS, FAMILY AND FRIENDS) around Yellowstone NP/Grand Teton NP the economic loss would be thousands of dollars. And that is just me! I return over and over again, something a hunter's money does not do. Once an animal is killed, THAT IS THAT. I can watch the same bear in every season! You guys are just going to cave to the cattle industry, waning hunting clubs, gas and oil conglomerates and hateful, uneducated trophy hunters who just want to fight the system and kill everything for a head to hang on their wall and a rug to walk all over on their floor. Like they are king of the hill. They don't know how to share the miracle of nature, they have to dominate it. I am disgusted, disheartened, upset, angry and ready for the fight. WE NEED GRIZZLIES IN THE WILD. I was cheated when past generations of egotistical, uneducated men decimated wild buffalo herds. I did not get to experience seeing this spectacular phenomenon. I DON'T WANT TO CHEAT MY GRANDKIDS OF THE EXPERIENCE OF SEEING GRIZZLIES IN THE WILD. DO NOT DELIST! DO NOT DELIST! DO NOT DELIST! DO NATURE A FAVOR AND DO NOT DELIST. Thank you for taking to heart my comments. I COUNT ON YOU TO SAVE OUR NATIONS GRIZZLIES!	FWS-R6-ES-2016-0042-1710	

As hard as many find it to allow hunting of an animal, it is wise to allow the regulated ability for locals and visitors to minimally hunt this animal increasing the maximum benefits to costs for this resource. If the bear is not allowed to be hunted there is room for future increased danger from the predator since there could be more potentially harmful human encounters since the bears will venture further off national park grounds. Reducing the numbers of bears that leave the national park ground could keep unsafe encounters to a minimum.	Factor B	The Greater Yellowstone area should remove the grizzly bear from the federal endangered species list. According to the data shown in graphs below it is perfectly reasonable for this species to no longer require federal attention and relinquish their management to the respective states. I believe we should use proper justification of data shown in this proposed rule to influence federal and state decisions, and not let the morals of hunting that many self-described conservationists influence decisions. The grizzly bears population has hit the species carrying capacity for that area according to figure 1. As hard as many find it to allow hunting of an animal, it is wise to allow the regulated ability for locals and visitors to minimally hunt this animal increasing the maximum benefits to costs for this resource. If the bear is not allowed to be hunted there is room for future increased danger from the predator since there could be more potentially harmful human encounters since the bears will venture further off national park grounds. Reducing the numbers of bears that leave the national park ground could keep unsafe encounters to a minimum. It's important to keep in mind the surrounding ecology that would be affected by the capped capacity to the bear population. As many other commenters continually emphasize the value of the bear population, they do not take into account the complexity of wildlife habitats. Other wildlife populations will be affected by more bears. More bison, elk and moose have become part of their diet. Does this mean that the conservationist commenters value the life of a bear more than the life of other animals that could be opportunistically eaten by the bears given the chance? The reduction of whitebark pine seeds could be problematic as well. Post hibernation, bears require all the nutrition possible to gain their fat reserves back. As documented these whitebark pine seeds be over consumed by the bear population. Adverse effects could be an increase in death for other wild animals or possible human deaths. There are thousands of visitors to Yellowstone every day, and there may be more human-bear interactions. As someone who values natural habitats and enjoys visiting our nation's largest national park it is our duty to now relinquish the responsibilities to manage these valued animals to their respective states. Let the coordination between fish and wildlife divisions keep the bear at a healthy population to continue to prosper, but not at such a high population that they can do other unnecessary harm to other parts of the forests ecology.	FWS-R6-ES-2016-0042-1740	
While the vast majority Americans, 90% by a national poll, support the Endangered Species act hunters have historically had the "ear" of state management and have been allowed to hunt species to near extinction, we must reverse this hostile management style in Yellowstone as many more people visiting this beautiful National Park want to see LIVE bears. Case in point bear 399 a female that thousands upon thousands of visitors from the US and around the world come back to see year after year with her cubs. The hunting clubs already have a target on her back and this does not bode well for Yellowstone tourism as well as the grizzly bear population as a whole. As well as wanting to perserve the endangered species act most Americans also oppose delisting the Yellowstone grizzlies. Only 26% of Americans actually want to delist the grizzly. The vast majority again want and expect the USFWS to to do their job and continue to protect the wildlife under their care.	Factor B	As a tax payer I would like to make my concerns known about any management plan to delist the Yellowstone Grizzlies. I am opposed for the following key reasons. 1. I have not seen any climate change impact study completed showing the impact on the current grizzly population. It has taken over 40 years to rebuild the grizzly population and they could be greatly impacted by climate change and their ability to survive if changes continue to negatively impact their food source such as it has with the Whitebark Pine. 2. Other food sources are declining as well due to other environmental reasons such as the Cutthroat Trout being lost due to invasive species taking over and moths are increasingly unreliable due to man's use of pesticides. These three primary food sources for grizzlies in decline mean that the current grizzly population will already be under stress to continue to survive without hunters being allowed to kill them as well. 3. Grizzly bears are already facing these hardships and coupled with being one of the slowest reproducing mammals we have in the United States it is a certainty that the killing of females would decimate the population within a very short period of time. Grizzlies have already lost 99% of their range. Yellowstone is one of the last of their territories in the continental united states and we must be cognizant of that fact if hunting is allowed and they cannot sustain reproduction. 4. While the vast majority Americans, 90% by a national poll, support the Endangered Species act hunters have historically had the "ear" of state management and have been allowed to hunt species to near extinction, we must reverse this hostile management style in Yellowstone as many more people visiting this beautiful National Park want to see LIVE bears. Case in point bear 399 a female that thousands upon thousands of visitors from the US and around the world come back to see year after year with her cubs. The hunting clubs already have a target on her back and this does not bode well for Yellowstone tourism as well as the grizzly bear population as a whole. As well as wanting to perserve the endangered species act most Americans also oppose delisting the Yellowstone grizzlies. Only 26% of Americans actually want to delist the grizzly. The vast majority again want and expect the USFWS to to do their job and continue to protect the wildlife under their care. 5. A record number of Yellowstone area grizzly bears were already killed in 2015 despite Endangered Species Act protections. The grizzly population is already being removed for increased conflicts with ranchers and illegal hunting as they roam further out to look for food sources to compensate for their primary food sources being affected by climate change and other environmental impacts. As a result of these increased numbers of grizzly bear killings it is far too early to delist them without further study and discussion of other management plans.	FWS-R6-ES-2016-0042-1750	

The principal impediment to migratory connectivity is human-caused mortality associated with livestock grazing and elk hunting. There is evidence that bear conflicts and mortality have occurred in both the Gravelly and Centennial ranges. The situation in the Wind Rivers, Wyoming and Salt River Ranges, could be similar. I suspect that livestock allotment priorities of the US Forest Service serve as management priority impediments to grizzly bear range, and thus, population expansion and stability. The matter of connectivity and wildlife conflicts should be a part of National Environmental Protection Act (NEPA) examination for all public land grazing allotment suitability examinations. These reviews should be conducted for every allotment in the Greater Yellowstone Ecosystem, prior to delisting, and the matter of conflict examined	Factor B	See attached file(s) Attachments Grizzly Bear Delisting Proposal Attn	FWS-R6-ES-2016-0042-1757	
Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat in the GYE and prevent them from colonizing other lands in which they were originally found. This will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of this land is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead should be "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations.	Factor B	I am apposed to delisting grizzly bears in the Greater Yellowstone Ecosystem (GYE) for the following reasons: 1. The fact is that one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services numbers. But what we do know is that at least 60 grizzlies died last year, mostly at the hand of man, and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest, if not the lowest reproductive rate of any mammal in the GYE. The continuation of such mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work needs to be done in the GYE to prevent many of these grizzly deaths before this population can be safely delisted. Such actions as mandating that ranchers remove their garbage and carcass dumps to county facilities, the use of bear-proof garbage cans in communities, camping areas, etc. within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for hunters and other public land users in grizzly habitat need to be implemented within the GYE before grizzlies are delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations, endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate bears from other populations into the GYE to improve genetic diversity but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat in the GYE and prevent them from colonizing other lands in which they were originally found. This will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of this land is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead should be "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout and possibly even army cutworm moths populations have recently been significantly reduced due to a variety of human caused issues. More research is needed to determine how the loss of these food sources will impact the future grizzly population in the GYE. 4. GYE	FWS-R6-ES-2016-0042-1765	

Hunting organizations and state wildlife management agencies have advanced the myth that grizzlies need to be hunted for them to fear man and that hunting will therefore reduce conflicts and increase the safety of people. Recent studies by respected grizzly researcher David Mattson and others have debunked this myth showing the exact opposite to be true. Bears used to being around people who exhibit them no harm show an overall decreased aggressive response to humans. A dead bear obviously cannot learn anything.	Factor B	I am apposed to delisting grizzly bears in the Greater Yellowstone Ecosystem (GYE) for the following reasons: 1. The fact is that one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services numbers. But what we do know is that at least 60 grizzlies died last year, mostly at the hand of man, and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest, if not the lowest reproductive rate of any mammal in the GYE. The continuation of such mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work needs to be done in the GYE to prevent many of these grizzly deaths before this population can be safely delisted. Such actions as mandating that ranchers remove their garbage and carcass dumps to county facilities, the use of bear-proof garbage cans in communities, camping areas, etc. within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for hunters and other public land users in grizzly habitat need to be implemented within the GYE before grizzlies are delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations, endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate bears from other populations into the GYE to improve genetic diversity but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat in the GYE and prevent them from colonizing other lands in which they were originally found. This will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of this land is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead should be "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout and possibly even army cutworm moths populations have recently been significantly reduced due to a variety of human caused issues. More research is needed to determine how the loss of these food sources will impact the future grizzly population in the GYE. 4. GYE	FWS-R6-ES-2016-0042-1765	
Delisting grizzly bears in the Greater Yellowstone Ecosystem (GYE) will enable Montana, Idaho, & Wyoming to initiate "sport hunting" of grizzlies. Trophy hunting/sport hunting has never been about managing populations. It is about hunting for sport and trophies.	Factor B	Delisting grizzly bears in the Greater Yellowstone Ecosystem (GYE) will enable Montana, Idaho, & Wyoming to initiate "sport hunting" of grizzlies. Trophy hunting/sport hunting has never been about managing populations. It is about hunting for sport and trophies. They don't give a damn about the population. They will hunt them until they are gone and you know it. Furthermore, nobody, including you, really knows how many grizzlies there are in the GYE. "The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing." This could cause hungry bears to look for food and be shot the minute they step outside Yellowstone. http://ricklamplugh.blogspot.com/2016/04/you-can-write-comment-that-helps-save.html So, I say to you, maintain GYE grizzly bear protections. Keep them on the list. Your attempt to delist GYE grizzly bears in the first place is an abrogation of your responsibilities under the Endangered Species Act. Since we do not know how many there actually are, that they are most probably declining with the decline of their food sources, and delisting would certainly allow Montana, Idaho, & Wyoming to initiate sport hunting in Yellowstone is a travesty of the protections afforded by the Endangered Species Act. Therefore, they must stay under the protection of the Endangered Species Act.	FWS-R6-ES-2016-0042-1817	

With crashes in their preferred foods, then there is the risk more will venture outside of the protected areas & run the risk of quickly being killed by the trophy hunters. They have shown time & again that they have no respect for wildlife or the species status as long as they get their kill.	Factor B	sir/madam, I am writing to ask you to not delist the Yellowstone population of Grizzly Bears from the Federal Endangered List. From what I understand, one of the leading ecologists, David Mattson, doubts your population estimates. Given his 20 years in the area, then that must be a significant reason not to change their status. With crashes in their preferred foods, then there is the risk more will venture outside of the protected areas & run the risk of quickly being killed by the trophy hunters. They have shown time & again that they have no respect for wildlife or the species status as long as they get their kill. After a killing period of a few years, then you will have no option but to readmit what will then be a fragile population, followed by the very slow growth that a small population with a slow breeding rate will need to recover. With this in mind, then the trophy hunters will go all out to get their kill in the short period that the Grizzlies are off the list, which will further increase the problem, not helped by the likely long period of time, it will take to readmit them to the endangered list. Therefore, there is only 1 solution, reject the hunters demands & keep the Yellowstone Grizzlies on the Federal Endangered List. thank you	FWS-R6-ES-2016-0042-1818	
After a killing period of a few years, then you will have no option but to readmit what will then be a fragile population, followed by the very slow growth that a small population with a slow breeding rate will need to recover. With this in mind, then the trophy hunters will go all out to get their kill in the short period that the Grizzlies are off the list, which will further increase the problem, not helped by the likely long period of time, it will take to readmit them to the endangered list.	Factor B	sir/madam, I am writing to ask you to not delist the Yellowstone population of Grizzly Bears from the Federal Endangered List. From what I understand, one of the leading ecologists, David Mattson, doubts your population estimates. Given his 20 years in the area, then that must be a significant reason not to change their status. With crashes in their preferred foods, then there is the risk more will venture outside of the protected areas & run the risk of quickly being killed by the trophy hunters. They have shown time & again that they have no respect for wildlife or the species status as long as they get their kill. After a killing period of a few years, then you will have no option but to readmit what will then be a fragile population, followed by the very slow growth that a small population with a slow breeding rate will need to recover. With this in mind, then the trophy hunters will go all out to get their kill in the short period that the Grizzlies are off the list, which will further increase the problem, not helped by the likely long period of time, it will take to readmit them to the endangered list. Therefore, there is only 1 solution, reject the hunters demands & keep the Yellowstone Grizzlies on the Federal Endangered List. thank you	FWS-R6-ES-2016-0042-1818	

In addition, if hunting has to be allowed, buffer zones should be placed around the NP to avoid baiting bears out of the parks. Elk hunting is already killing Grizzlies and rarely, if ever, hunters are fined for rebar kills	Factor B	Don't delist Grizzlies. Grizzly occupy about 1% of their former range and their main food since are threatened by climate change and agricultural regulations. In addition, if hunting has to be allowed, buffer zones should be placed around the NP to avoid baiting bears out of the parks. Elk hunting is already killing Grizzlies and rarely, if ever, hunters are fined for rebar kills	FWS-R6-ES-2016-0042-1821	
As we saw with Scarface, grizzly bears will be killed even if they remain protected. In 2015, a record number of Yellowstone bears were killed. It is premature to delist now. We should wait and see how these removals impact the overall population. If hunting is permitted, there should be a moratorium until states can absolutely prove they can manage the grizzly population to keep it at least at current levels. There must be buffer zones around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park. As you know, grizzlies are one of the slowest reproducing mammals. As a result, loss of several females in a year would be devastating for the population.	Factor B	I'm writing to comment on the proposal to remove the Greater Yellowstone Grizzly Bear from the Federal List of Endangered and Threatened Wildlife. As we saw with Scarface, grizzly bears will be killed even if they remain protected. In 2015, a record number of Yellowstone bears were killed. It is premature to delist now. We should wait and see how these removals impact the overall population. If hunting is permitted, there should be a moratorium until states can absolutely prove they can manage the grizzly population to keep it at least at current levels. There must be buffer zones around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park. As you know, grizzlies are one of the slowest reproducing mammals. As a result, loss of several females in a year would be devastating for the population. Most Americans oppose delisting of the grizzly bear. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The proposed delisting does not address the genetic isolation of Yellowstone grizzlies. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Please keep these points in mind when making any decision on delisting of the grizzly in the Yellowstone ecosystem.	FWS-R6-ES-2016-0042-1820	

	Factor B	Our family frequently visits Wyoming and Yellowstone National Park. We care about all the animals in the state and we were happy to learn the grizzly bear population is thriving thanks to the Endangered Species Act. However, we were unhappy to learn that the Fish and Wildlife Service is considering taking grizzlies off the Endangered Species List. Until a comprehensive bear management plan is put in place and agreed to by Wyoming, Montana, and Idaho, it would be irresponsible to delist the grizzlies. Taking the bears off the list means that they'll once again be hunted, something we are firmly against. Please show us that the safeguards are in place for these magnificent bears to continue thriving before removing them from the list.	FWS-R6-ES-2016-0042-1831	
The increasingly far-right legislatures of Idaho, Montana, and Wyoming are thirsty for the bear management control that would come to their fish and game departments with delisting the Yellowstone grizzly. The bears would be hunted. Their numbers and the extent of their range would inevitably be reduced.	Factor B	I am the author of THE GRIZZLY BEAR, first published by Alfred A. Knopf in 1984 and republished several times, most recently in 1997 by Lyons and Burford. It was called "a classic" by the New York Times and is still considered the definitive book on the Yellowstone grizzly bear population. I am also a former chairman of the Greater Yellowstone Coalition as well as a former partner in a cattle ranch within the Greater Yellowstone Ecosystem which is seasonally occupied grizzly bear habitat. The proposed end of federal protection of the Yellowstone grizzly bear is trumpeted in some quarters as one of the great triumphs of the Endangered Species Act. In fact it would be a spurious victory. The most salient argument against delisting is the collapse of the grizzlies' food system. By far the most important source of nutrition for the bears has been the seeds of the whitebark pine tree, but the whitebark is under a double attack. The native mountain pine beetle has historically been kept in check by periodic deep freezes, but there haven't been any of those for years now. The other attacker is the deadly, non-native white pine blister rust. More than 95 percent of the whitebarks are now dead. Until recent years, early each summer there were vast runs of spawning cutthroat trout up the tributaries of Yellowstone Lake a high-fat feast for grizzlies. Since the illegal introduction of non-native lake trout, however, which feed on juvenile cutthroats, the spawning runs are down by 90 percent. A less well understood but equally grave danger is that Yellowstone grizzlies live on what is effectively an island. Island populations are subject to inbreeding and hence lowered reproduction rates and grizzlies are already among the least fecund mammals, rarely producing young until the age of five, with litters of two cubs most common, typically three years apart. When island populations dip, they cannot be resupplied by adjacent populations, because there aren't any. The study of island biogeography has found that islands always have higher rates of extinction. Grizzlies are notoriously hard to count, and some independent scientists have challenged the studies on which the government has based its population assessments not only of present numbers but of projected ones. Their analyses indicate that the population is already declining. The increasingly far-right legislatures of Idaho, Montana, and Wyoming are thirsty for the bear management control that would come to their fish and game departments with delisting the Yellowstone grizzly. The bears would be hunted. Their numbers and the extent of their range would inevitably be reduced. Opponents of delisting cite what happened when Yellowstone's gray wolves came under state management. Montana has been pretty good, but conservationists claim that Idaho's approach, at least in some parts of the wolves' range, has been not far short of outright slaughter, and Wyoming decreed that outside a zone encircling Yellowstone and its adjacent	FWS-R6-ES-2016-0042-1832	

Because the Grizzlies are hibernating later and waking up to spring earlier, the trapping that is allowed places the Grizzlies at risk. Management should not cause undue pain and suffering. Management for the greater good should not include cruelty to animals. Protection of the Grizzlies by the ESA is just so many words if trapping of another species, the wolves, puts them at risk. The Grizzly should remain on the ESA listing.	Factor B	I can't imagine the devastation that will occur for Grizzlies if they are removed from the Greater Yellowstone Ecosystem ESA list. The studies of wildlife biologists and ecologists follow the actual habits of the Grizzly. The studies of human doctors and ecologists and scientists follow the actual habits and developments of human beings as well. Both are valid means of understanding changes in the habits of species. Because the Grizzlies are hibernating later and waking up to spring earlier, the trapping that is allowed places the Grizzlies at risk. Management should not cause undue pain and suffering. Management for the greater good should not include cruelty to animals. Protection of the Grizzlies by the ESA is just so many words if trapping of another species, the wolves, puts them at risk. The Grizzly should remain on the ESA listing.	FWS-R6-ES-2016-0042-1975	
In the form of a leaked memo, the 3 states said that they will open up trophy hunting seasons for the bears. I believe that opening such seasons is a prime motivation for the states in pushing for de-listing. If you look at what each state is doing to manage wolves, it is clear that they will only allow the minimum numbers of individuals to survive, nothing more. Relying on state agencies, that have shown a deep hatred towards any predator shall NOT be allowed or given a chance to manage a endangered species. FWS claim that they will monitor grizzly numbers to make sure they stay at sustainable levels after delisting.	Factor B	Thank you for allowing public comment on this Proposed issue: The shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Plus, the GYE is an isolated "island" where species diversity is limited because corridor for new genetic are shut down because of human inter mention (i.e. road, ranches, etc) GYE region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. FWS will stay involved with protecting the grizzly population after delisting. In the form of a leaked memo, the 3 states said that they will open up trophy hunting seasons for the bears. I believe that opening such seasons is a prime motivation for the states in pushing for de-listing. If you look at what each state is doing to manage wolves, it is clear that they will only allow the minimum numbers of individuals to survive, nothing more. Relying on state agencies, that have shown a deep hatred towards any predator shall NOT be allowed or given a chance to manage a endangered species. FWS claim that they will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future, "the grizzly	FWS-R6-ES-2016-0042-1922	

Please let the Grizzly Bear live by letting it remain on the list of endangered and threatened wildlife. Look at what happened just this past December in North New Jersey where 400 black bear were killed in the first two days of the hunt. People were so eager to kill that the hunt was ended early. For the sake of our nations soul please don't send the hunters in to kill our grizzly bears.	Factor B	Please let the Grizzly Bear live by letting it remain on the list of endangered and threatened wildlife. Look at what happened just this past December in North New Jersey where 400 black bear were killed in the first two days of the hunt. People were so eager to kill that the hunt was ended early. For the sake of our nations soul please don't send the hunters in to kill our grizzly bears. We need the bears, wolves cougars, moose, deer, beavers and buffalo in out parks. Our nation and our future generations need our wild places with the all the wild creatures roaming freely. Thank you for being thoughtful and loving care takers of our wildlife. Respectfully, Angela Nelson Torrance, CA	FWS-R6-ES-2016-0042-2212	
There isn't an accurate count of the Grizzly Bear population and by delisting the Grizzly Bear, we are opening it up for the bears to be hunted as trophies. While the government can say that safeguards will be put in place to protect the Grizzly Bear to the extent that they can be protected once they are delisted, I doubt that there is adequate manpower in the governmental agencies, to make sure the rules/laws/quotas are followed by hunters. Scarface's death by a hunter is evidence of that. We have brought back the Grizzly Bear population to an almost viable level, why would we undo all the work that has been accomplished, while they have been under protection, by taking them off the endangered species list? They face enough challenges w/changing eco-systems, lack of food, etc. without having to deal with trophy hunters, too. Relinquishing federal protection now and handing management over to the various states involved would be a huge error in judgment.	Factor B	I am against The Fish and Wildlife Service removing the Greater Yellowstone Grizzly Bear from the endangered species list. There isn't an accurate count of the Grizzly Bear population and by delisting the Grizzly Bear, we are opening it up for the bears to be hunted as trophies. While the government can say that safeguards will be put in place to protect the Grizzly Bear to the extent that they can be protected once they are delisted, I doubt that there is adequate manpower in the governmental agencies, to make sure the rules/laws/quotas are followed by hunters. Scarface's death by a hunter is evidence of that. We have brought back the Grizzly Bear population to an almost viable level, why would we undo all the work that has been accomplished, while they have been under protection, by taking them off the endangered species list? They face enough challenges w/changing eco-systems, lack of food, etc. without having to deal with trophy hunters, too. Relinquishing federal protection now and handing management over to the various states involved would be a huge error in judgment.	FWS-R6-ES-2016-0042-2261	

Furthermore, I believe a buffer zone of safety needs to be established around parks where grizzly bears live. In spite of being on the protected list, several grizzly bears have been killed by hunters. All hunters should be mandated to carry bear spray and use it in the event of an unlikely encounter. Save the bullet, try bear spray first. Most hunters are good marksmen, so it wouldn't hurt to refrain from opening fire on a bear in close proximity. If the grizzly bear is delisted, we can expect hunters to bait grizzly in the backcountry where it is difficult to regulate laws. After wolves were taken off the protected list, a few hunters baited wolves just outside YNP's park boundary. This is NOT hunting. Yet I'm confident the same thing will happen if the grizzly bear is delisted. Carcasses will be left in random places by some hunters who are adamant about getting that bear. Please don't let big money influence this decision.	Factor B	I'm writing because I oppose delisting the grizzly bear. I don't believe grizzlies have recovered to the point that the nation can afford to delist the bears and subject them to trophy hunters. Their reproductive cycle is slow. Scarface, the most famous YNP bear was thought to have fathered 3 cubs in his entire 25 years. Only 3 cubs. If he fathered more, they certainly didn't survive. Furthermore, I believe a buffer zone of safety needs to be established around parks where grizzly bears live. In spite of being on the protected list, several grizzly bears have been killed by hunters. All hunters should be mandated to carry bear spray and use it in the event of an unlikely encounter. Save the bullet, try bear spray first. Most hunters are good marksmen, so it wouldn't hurt to refrain from opening fire on a bear in close proximity. If the grizzly bear is delisted, we can expect hunters to bait grizzly in the backcountry where it is difficult to regulate laws. After wolves were taken off the protected list, a few hunters baited wolves just outside YNP's park boundary. This is NOT hunting. Yet I'm confident the same thing will happen if the grizzly bear is delisted. Carcasses will be left in random places by some hunters who are adamant about getting that bear. Please don't let big money influence this decision.	FWS-R6-ES-2016-0042-2273	
Since the hunting of these animals can only be considered a trophy hunt and not a true food source, there is no need to rush to remove them from the endangered list. No human will go hungry if they are not allowed to hunt grizzly bears. Please wait for the bear population to not only increase but to thrive before considering the removal of them from the endangered species list! Thank you,	Factor B	It is my wish that the proposal to remove the grizzly bear from the endangered species list be denied. Further studies are needed to insure that this majestic animal is no longer in danger of extinction. With such a limited gene pool, lower numbers of bears can only in the long term hurt them and their chances not only for survival but to thrive as well. Since the hunting of these animals can only be considered a trophy hunt and not a true food source, there is no need to rush to remove them from the endangered list. No human will go hungry if they are not allowed to hunt grizzly bears. Please wait for the bear population to not only increase but to thrive before considering the removal of them from the endangered species list! Thank you,	FWS-R6-ES-2016-0042-2318	

Live in Wyoming, and know all to well the mind set of the majority of people here. The minute an animal is delisted here, every hunter is out in force. As we saw with the wolf, in a matter of months, we will put the Grizzly Bears back on the endangered list. It won't be the legal hunting that puts them there, it will be all the EXCUSED killings disguised as protecting ones property, livestock, or self, which until they are delisted, hasn't been a problem here. But as we saw with the wolf, any excuse allowed, will be used to kill the wildlife here. Wildlife that was here first, and is more deserving of this territory than we are.	Factor B	I Live in Wyoming, and know all to well the mind set of the majority of people here. The minute an animal is delisted here, every hunter is out in force. As we saw with the wolf, in a matter of months, we will put the Grizzly Bears back on the endangered list. It won't be the legal hunting that puts them there, it will be all the EXCUSED killings disguised as protecting ones property, livestock, or self, which until they are delisted, hasn't been a problem here. But as we saw with the wolf, any excuse allowed, will be used to kill the wildlife here. Wildlife that was here first, and is more deserving of this territory than we are.	FWS-R6-ES-2016-0042-2338	
I am most concerned with the thought of these wonderful creatures becoming the next Trophy Hunter's target. It breaks my heart that those bears, watched, studied and loved by so many could end up on someone's wall - or as a rug under their feet. This will be devastating to grizzly populations.	Factor B	I very much oppose removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I am a life long resident of Western Montana and believe this step would be devastating to the grizzly population. The grizzly population is still fragile and saw 61 deaths alone in 2015. Their normal food sources are no longer readily available which has left their population flat over the past decade. However, I am most concerned with the thought of these wonderful creatures becoming the next Trophy Hunter's target. It breaks my heart that those bears, watched, studied and loved by so many could end up on someone's wall - or as a rug under their feet. This will be devastating to grizzly populations. We as the human race should know better and understand just how detrimental our actions are. It's time to do the right thing - please DO NOT REMOVE the Grizzly Bear from the Federal List of Endangered and Threatened Wildlife.	FWS-R6-ES-2016-0042-2424	

Each year some of Yellowstone grizzlies are killed by vehicular traffic. That fact alone should negate a hunting season! Even if the bear is delisted why does it need to be hunted?	Factor B	See Attached Attachments Carson Millie	FWS-R6-ES-2016-0042-2459	
Every year there are less and less hunters let alone a hunter with the skill set necessary to kill a grizzly. To delist a grizzly for a few trophy hunters would be a grave irresponsibility by all of us	Factor B	Grizzly Bears should never come off the Endangered Species list. As far as I'm concerned some could be relocated to the Bighorn National Forest in Wy. There are so few of them and they are an island species. Every year there are less and less hunters let alone a hunter with the skill set necessary to kill a grizzly. To delist a grizzly for a few trophy hunters would be a grave irresponsibility by all of us.	FWS-R6-ES-2016-0042-2510	

Many years ago, I too wanted to hunt and kill a grizzly bear. I thought that having a grizzly bear skin on my wall would be the neatest thing. I am glad now that I never got the chance. I am ashamed to now think of what I wanted to do. So I now ask that you put me on the list of people asking you to protect the grizzly. Do something right for a change and protect these animals that without our help cannot protect themselves. They stand no chance. Climate change and hunters will wipe them from the earth.	Factor B	The government does not have the best record for protecting our wildlife and fish. Animals have gone to extinction because of the hands of man. Now we have the chance to keep that from happening to the Grizzly Bear. Are we going to help them in their need, or are we going to be stupid again and let these wonderful bears disappear like others and then regret the move. I am 75 years old and went to Yellowstone with my family in 1947. we saw many of the wonders of the park. The one thing I will go to my grave remembering is the day we saw a grizzly bear. So big and powerful. He walked like the king in his domain. I have never had the chance to again go to Yellowstone, but many young people will. Please do something right for a change and protect the grizzly bears. With your support all people will be able to see what I saw and it was wonderful. If people want to shot grizzlies, let them do it with a camera. The world is going to Hell in a hand basket. Lets not help by lifting the protection on the grizzly bear. This bear speaks to all generations through programs on TV. I know my family watches and we enjoy seeing one of GODs creatures living like it has for many hundreds of years. Look at what happened when we removed wolves from Yellowstone. Nature could not keep the balance of animals because they were gone. So it will be if grizzlies are hunted and not protected. Many years ago, I too wanted to hunt and kill a grizzly bear. I thought that having a grizzly bear skin on my wall would be the neatest thing. I am glad now that I never got the chance. I am ashamed to now think of what I wanted to do. So I now ask that you put me on the list of people asking you to protect the grizzly. Do something right for a change and protect these animals that without our help cannot protect themselves. They stand no chance. Climate change and hunters will wipe them from the earth. YOU ALL can play God in this matter. DON'T screw it up.	FWS-R6-ES-2016-0042-2555	
Given the fact that the states are going to institute a sports hunt the minute the animal is removed from the list, and the death of Yellowstone's famous Grizzly, Scarface, by shotgun is proof that they can't wait for this to happen, and is another reason to leave the bear on the list. In addition to hunting bears for sport, ranchers will feel more free to kill bears and call them "nuisance animals". They must be protected from humans who will kill them simply to protect their financial interests.	Factor B	The Grizzly Bear should not be removed from the Federal List of Endangered and Threatened Wildlife. The studies in the federal report recommending delisting have not undergone rigorous review by outside scientists and have not been published in scientific journals. This is considered a crucial step in validating scientific research and must not be skipped. Given the fact that the states are going to institute a sports hunt the minute the animal is removed from the list, and the death of Yellowstone's famous Grizzly, Scarface, by shotgun is proof that they can't wait for this to happen, and is another reason to leave the bear on the list. In addition to hunting bears for sport, ranchers will feel more free to kill bears and call them "nuisance animals". They must be protected from humans who will kill them simply to protect their financial interests. According to many scientists, federal protection makes it more likely that bears can continue to spread out into areas known to be suitable for bears. A wider range for the bear, could bring the Yellowstone population into contact with other grizzly populations, making all of the populations less vulnerable in the long haul to starvation, disease and their top predator - man.	FWS-R6-ES-2016-0042-2575	

History has proven that hunters will again decimate the grizzly population to the point of extinction. If they are ever placed back under federal protection, it would take years to get that done legislatively - if at all. The breeding will be done with a smaller gene pool that will lead to more health issues for the bears.	Factor B	The federal protection for grizzly bears should NOT be removed! History has proven that hunters will again decimate the grizzly population to the point of extinction. If they are ever placed back under federal protection, it would take years to get that done legislatively - if at all. The breeding will be done with a smaller gene pool that will lead to more health issues for the bears. It would also be more expensive in the long run to reintroduce bears to Yellowstone when the hunters kill most of the them with without federal protection.	FWS-R6-ES-2016-0042-2518	
Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management.	Factor B	I OPPOSE the delisting of the Grizzly Bears. "Why rush with a decision to delist, when all indicators are of a population that is vulnerable and positioned to decline even more than they already have?" - Dr. David Mattson Dr. Jane Goodall opposes delisting also. Yellowstone's grizzly bears have lost critically important foods. Since the early to mid-2000s, two of the four key grizzly bear foods, cutthroat trout and the seeds of whitebark pine, have collapsed. Drought, climate warming and predation by a nonnative trout have nearly extirpated cutthroat trout in Yellowstone Lake. Whitebark pine have been functionally wiped out by the spread of a non-native fungal disease and by a highly lethal and unprecedented climate-driven outbreak of bark beetles. Most elk populations have also declinedsome dramatically-- from highs reached during the 1990s and early 2000s. There is no doubt that food resources of Yellowstone's grizzly bears have declined and put the population at grave risk, with a prognosis of more of the same to come. State-level management of large carnivores is a problem. State wildlife management agencies in the West are locked down in an Iron Triangle that serves the minority special interests of those who want to kill deer, elk, moose, and bighorn sheep (i.e., ungulates). State agencies view large carnivores primarily as competitors for ungulates that could otherwise be on the market for sport hunting licenses, which are a major source of agency revenue. Sport hunting has been used during recent decades to drive down populations of mountain lions and wolves, and, accounts for roughly 70-80% of all deaths of adult carnivores in the region. Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals. Grizzly bears are vulnerable to the excesses of state-level wildlife management. Grizzly bears have one of the lowest reproductive rates of any terrestrial mammal. A typical female will only produce 2 cubs once every 3 years, with good odds that one of the cubs will die before it reaches adulthood. Grizzly bears also have difficulty colonizing new habitats, primarily because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates, and readily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. The US Fish & Wildlife Service cannot reliably assess the status of the Yellowstone population. Grizzly bears is	FWS-R6-ES-2016-0042-2615	

I read the proposed rule change and understand that hunting would be contingent upon what the states of Idaho, Montana and Wyoming do for management. Plus hunting would be away from areas of the park containing large numbers of visitors. But let's not be naive. Two things that will happen if the grizzly bears lose Federal protection. First, this population of bears has not been hunted in years. That means they do not have the learned survival and cautionary skills of other hunted animals. Grizzly bears are accustomed to being the top predator once they reach adulthood, which will make the Yellowstone bears 'sitting ducks'. Hunters *will* sit at the hunting boundaries waiting for bears to cross the line. A naive group of grizzlies is a trophy hunter's dream. What will stop hunting guides, who work for people like Walter Palmer, from luring trophy bears out of protected areas? Park Rangers won't be able to watch every hunting group. Without Endangered Species protection, a US version of Cecil the Lion *will* happen.	Factor B	Please do not remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. Yellowstone grizzlies are a special population in a special place. Only there, with all of the protections, can novice wildlife enthusiasts glimpse a view of a grizzly bear in its natural habitat behaving as it might in real life, without fear of humans. I am from Michigan and camp every year in the Upper Peninsula near Seney. According to our State DNR, 15000 - 19000 black bears live in the U.P., or ~1 bear/square mile. That is 5 times more higher the number of grizzlies in Yellowstone (~700 bears/ 3468 sq.miles). Yet, we haven't seen a live bear in 20 years. We see plenty of bear hunters and bear hounds, but, ever since bear hunting became so popular, the only bears we see are dead ones strapped across the hoods of trucks. I know black bears are shy, but the high hunting pressure makes them flee all humans. It would be a crime for all future generations of Americans to allow the same thing to happen in Yellowstone. My only visit to Yellowstone was in 2002 when my family camped there for 10 days. In addition to bison and thermal features, we hoped to see a grizzly bear. And we did! We were fortunate enough to have 3 separate sightings of grizzlies high on a hill and ambling across a meadow. When the bear appeared, everyone and every vehicle stopped. We stood with total strangers, watching for over an hour until the bear moved on and out of sight. That was pure magic which all Americans should be allowed to experience. I read the proposed rule change and understand that hunting would be contingent upon what the states of Idaho, Montana and Wyoming do for management. Plus hunting would be away from areas of the park containing large numbers of visitors. But let's not be naive. Two things that will happen if the grizzly bears lose Federal protection. First, this population of bears has not been hunted in years. That means they do not have the learned survival and cautionary skills of other hunted animals. Grizzly bears are accustomed to being the top predator once they reach adulthood, which will make the Yellowstone bears 'sitting ducks'. Hunters *will* sit at the hunting boundaries waiting for bears to cross the line. A naive group of grizzlies is a trophy hunter's dream. What will stop hunting guides, who work for people like Walter Palmer, from luring trophy bears out of protected areas? Park Rangers won't be able to watch every hunting group. Without Endangered Species protection, a US version of Cecil the Lion *will* happen. Second, after the bears have been hunted for a season or two, they will learn. And they will avoid all humans as best as they can. Those magical sightings that my family was privileged to have will be lost to all future Americans. That would be a terrible crime violating the whole purpose the National Park of Yellowstone. Next, Yellowstone grizzly bears do not represent a threat to	FWS-R6-ES-2016-0042-2659	
We do not want to see happen to the Grizzly what has happened in Africa due to animal rights emotions, people have cried out for one lion given a name while hundreds have been slaughtered by governments due to lack of habitat and further restrictions on hunting. If you look back in history, hunters have brought back many species from almost extinction and pay 90% of the funds that helped make this possible.	Factor B	Please delist before emotion destroyed this great animal. The bear Scarface is a great example of an ecosystem overrun by large predators, he clearly was starving and had to leave the park. We'll see more and more similar encounters in the future and a human life should always be more important than an animal. With regulated hunting we will see further funding help establish the species with more money to put towards game management and habitat restoration. We do not want to see happen to the Grizzly what has happened in Africa due to animal rights emotions, people have cried out for one lion given a name while hundreds have been slaughtered by governments due to lack of habitat and further restrictions on hunting. If you look back in history, hunters have brought back many species from almost extinction and pay 90% of the funds that helped make this possible. Animal rights groups work on lawsuits and emotion, I have yet to see them finance any efforts towards habitat restoration but hunting conservation groups like RMEF have saved over 6 million acres of prime development land from ever being developed in key ecosystems and have had volunteers restore habitat and kill invasive weeds all to help manage a healthy ecosystem. Part of managing an ecosystem is management through hunting to keep healthy viable game numbers. Please delist so that better management can be done as we know only hunters put their money towards our wonderfully wildlife. We should all praise hunters as I have yet to see another group help out our wildlife like them. Delisting is the best thing for the Grizzly population.	FWS-R6-ES-2016-0042-2672	

Grizzly bears may be on the rise in the area but they are overall rare in America because of over hunting in the past and reduced land area available for breeding and roaming. I believe that it is important to continue to safe guard this species by banning hunting. In addition very few people hunt grizzly for food - being a carnivore they are not generally considered suitable to eat and would be hunted as a trophy animal.	Factor B	I do not think you should lift the bans on hunting. Grizzly bears may be on the rise in the area but they are overall rare in America because of over hunting in the past and reduced land area available for breeding and roaming. I believe that it is important to continue to safe guard this species by banning hunting. In addition very few people hunt grizzly for food - being a carnivore they are not generally considered suitable to eat and would be hunted as a trophy animal. Rich white guys don't need another bear to hang on their wall, we need to continue to protect this animal.	FWS-R6-ES-2016-0042-2699	
This iconic bear creates millions of dollars of revenue for Wyoming, Montana and other states where tourists flock to see these remarkable animals in their natural habitat. These bears exist for the benefit of all Americans, not just those in the states where they reside. Removing them from Federal List and allowing them to be "managed" solely by individual states will surely result in significant reduction in numbers, through hunting or other "management" designed only for the benefit of a small segment of the state population - ranchers who utilize public lands for grazing.	Factor B	I do not believe the Grizzly bear should be removed from the Federal List of Endangered and Threatened Wildlife. This iconic bear creates millions of dollars of revenue for Wyoming, Montana and other states where tourists flock to see these remarkable animals in their natural habitat. These bears exist for the benefit of all Americans, not just those in the states where they reside. Removing them from Federal List and allowing them to be "managed" solely by individual states will surely result in significant reduction in numbers, through hunting or other "management" designed only for the benefit of a small segment of the state population - ranchers who utilize public lands for grazing. Far better that we compensate ranchers for loss of livestock than subject the Grizzly to the type of "management" that will result in far fewer tourist dollars in the affected states and in the end reduce the number of wild Grizzlies back to an endangered level.	FWS-R6-ES-2016-0042-2688	

What concerns me most is the FACT that pregnant sows MUST put on sufficient weight prior to hibernating. If they lack the fat reserves, they abort the fetus. If we have a major event that keeps the majority of sows from carrying and birthing cubs for one year, the impact on the overall population would be terrible at best and cataclysmic at worst. The plan is to put the grizzly back on the ESL if it falls below a certain threshold. It is entirely possible that a combination of killing 15% to 20% of the population combined with an unforeseen food source problem, it may to late.	Factor B	Delisting grizzlies in the GYE is a mistake. I have been visiting Yellowstone for over 15 years. I make the long trek from Southern California to Yellowstone every year; sometimes twice a year for one main reason. To hike the backcountry with the great bear. I am not a scientist. I have no "Hard Numbers" of data to offer to my argument. Just my experience as a hiker and overnight backpacker through the Pelican Valley, Mist Trail, Lamar Trail, Rim Trail, on and on. I can tell you this, seeing a grizzly in the backcountry is a life changing event. It puts humility back in humanity. It lets us know that (without high powered rifles) we are not the alpha predator. We have our brain and our opposable thumbs. Our Brain goes on "Hi Alert" when in grizzly country. Our opposable thumbs lift our backpacks at night to keep the bears from raiding our campsites. We hold our breath with the situation arises. But in the moment, our daily problems disappear as our goal is to enjoy nature on NATURES TERMS. And, to me, the grizzly bear is the epitome of nature; of "The Wild." This is an animal that can kill a human at anytime if it choose to do so. It rarely; I mean RARELY does. And when it does, it is usually because we have made a mistake. We have not respected the great bear and the results can be deadly. Of course, even the most stupid human mistakes in bear country rarely result in injury, let alone death. I think it is clear that the jury is out on the status of the grizzly bear and its recovery status in the GYE. Scientists, groups on both sides (including the powerful attorneys) are set to battle no matter which decision is made. But what strikes me is that there are so few grizzlies in the lower 48 no matter what estimation, extrapolation is used. Are the grizzlies truly recovered enough to delist? Are some of the numbers of grizzlies located in genetically isolated areas that can not contribute to the ongoing survival of the species? What about the effects of our warming climate and the effect it has on the grizzlies food sources? I know that some scientists say that the lack of the White Bark Pine Nut has had a minimal impact because grizzlies are opportunistic and have adapted. Have they? Are we certain? Do we have enough data over a long enough period to KNOW this. Sadly, it is apparent to me that we as a society are willing to risk the loss of the great bear from the GYE. This is not about human safety as humans are (and should be allowed) to kill aggressive / problem bears. I have no problem with that (when it is properly investigated and legal action taken when the circumstances did not justify killing the grizzly). Montana, Wyoming and Idaho have a "Dog in the fight" because they are anxious to get the fees for grizzly tags. I'm all for states rights. But in this case, the grizzly bear simply is still at risk of extinction. There are too many "unknowns" in the calculations / extrapolations. ~~The fact is, the only way to know the true health of the grizzly population is to have an accurate count of sows~~	FWS-R6-ES-2016-0042-2640	
They are still going to be hunted to extinction, no matter what the number is when they are considered 'too many'. What happens when we end up killing almost all of them again? Will there still be an 'endangered species protection' available? If they are going to allow the authorized killing of protected species then there needs to be more regulation: size, age, mating pairs, etc.	Factor B	As with many other protected species, they get to a point in population growth that people don't believe they are still endangered. This is wrong. These species are in danger! They are still going to be hunted to extinction, no matter what the number is when they are considered 'too many'. What happens when we end up killing almost all of them again? Will there still be an 'endangered species protection' available? If they are going to allow the authorized killing of protected species then there needs to be more regulation: size, age, mating pairs, etc. Save our animal and avian neighbors. Everything has a place in this world.	FWS-R6-ES-2016-0042-2796	

The healthy bears will end up being shot and the weakest will live. Think about this. We don't need the great hunters with high powered guns a blazing at a nature's bears. It's not like humans need to kill to eat. They just want a head over their fire place. Leave them alone. It was hard to hear about a bear living that long just to get shot. Maybe with antibiotics he could have lived a little longer.	Factor B	The healthy bears will end up being shot and the weakest will live. Think about this. We don't need the great hunters with high powered guns a blazing at a nature's bears. It's not like humans need to kill to eat. They just want a head over their fire place. Leave them alone. It was hard to hear about a bear living that long just to get shot. Maybe with antibiotics he could have lived a little longer.	FWS-R6-ES-2016-0042-2857	
Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. A	Factor B	I do not think grizzly bears should be de-listed as an ESA. There are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, digging for grubs and hunting prey. Seeing a grizzly bear in the wild is usually an experience that remains with you for life.	FWS-R6-ES-2016-0042-2883	

The only reason to delist them would be so trophy hunters can have fun killing them, and to decorate their houses with bear rugs or put their heads on their walls. I don't think that's a good enough reason.	Factor B	Please don't delist the grizzly bears from the Endangered Species list. Some grizzlies, like Scarface, are already being illegally killed! The only reason to delist them would be so trophy hunters can have fun killing them, and to decorate their houses with bear rugs or put their heads on their walls. I don't think that's a good enough reason. Grizzly bears' naturally slow reproductive rate, and loss of key food sources due to climate change, make delisting them a recipe for disaster.	FWS-R6-ES-2016-0042-2942	
Accurately estimating the number of bears in a large, rugged area like the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review.	Factor B	My comment is included in the uploaded file. Attachments 5-4-16GrizzCommentFinal	FWS-R6-ES-2016-0042-2973	

With current birth rates and mortality rates, the grizzly bear population is in decline. More bears are being killed than are being born. The numbers I use below are taken from an IGBST study in September 2012 ("Updating and evaluating approaches to estimate population size and sustainable mortality limits for Grizzly bears in the Greater Yellowstone Ecosystem" - http://nrmcs.usgs.gov/files/norock/IGBST/GYEGBMortWksRpt2012(2).pdf) Firstly it notes that the population has grown between zero and 2.2% from 2002 to 2012. Meaning minimal growth. Your own scientists are telling you that the population is static at best Secondly - Assuming there are 714 grizzlies in 2016, which IBSGT state is the number. 27% of these are females of 5 and over that can give birth to young. They give birth to an average of 2 cubs every 3 years. The survival rate of the cubs is 55%. So that gives a population increase of 59 bears per year. 714 @ 27% = 192 reproducing females, 192/3 = 64 bears giving birth in a year, Average 2 cubs per cycle = 108, Survival rate of 55% = 59 young bears born and survive each year. Thirdly, the mortality rate of 61 in 2015 (https://www.usgs.gov/data-tools/2015-known-and-probable-grizzly-bear-mortalities-greater-yellowstone-ecosystem) does include some of these cubs (10 to be exact) so it would be double counting to say the birth rate minus the death rate is a true number. But the report also states that 1 bear dies for 2 that are documented, so 61 deaths could be something like 90 deaths. The mortality rate is likely to increase. The very high mortality rate of 2015 will become the rule, not the exception.	Factor B	I oppose removing the GYE Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife With current birth rates and mortality rates, the grizzly bear population is in decline. More bears are being killed than are being born. The numbers I use below are taken from an IGBST study in September 2012 ("Updating and evaluating approaches to estimate population size and sustainable mortality limits for Grizzly bears in the Greater Yellowstone Ecosystem" - http://nrmcs.usgs.gov/files/norock/IGBST/GYEGBMortWksRpt2012(2).pdf) Firstly it notes that the population has grown between zero and 2.2% from 2002 to 2012. Meaning minimal growth. Your own scientists are telling you that the population is static at best Secondly - Assuming there are 714 grizzlies in 2016, which IBSGT state is the number. 27% of these are females of 5 and over that can give birth to young. They give birth to an average of 2 cubs every 3 years. The survival rate of the cubs is 55%. So that gives a population increase of 59 bears per year. 714 @ 27% = 192 reproducing females, 192/3 = 64 bears giving birth in a year, Average 2 cubs per cycle = 108, Survival rate of 55% = 59 young bears born and survive each year. Thirdly, the mortality rate of 61 in 2015 (https://www.usgs.gov/data-tools/2015-known-and-probable-grizzly-bear-mortalities-greater-yellowstone-ecosystem) does include some of these cubs (10 to be exact) so it would be double counting to say the birth rate minus the death rate is a true number. But the report also states that 1 bear dies for 2 that are documented, so 61 deaths could be something like 90 deaths. The mortality rate is likely to increase. The very high mortality rate of 2015 will become the rule, not the exception. And that's before delisting and before hunting is allowed. There are minimal investigations into bear killings, and minimal deterrents (fines, imprisonment). Hunters and ranchers are killing bears with impunity. For example the killer of "Scarface" is still not known. In addition there are increased killing of conflict bears by USFWS and the Game & Fish departments as bears look for food further afield. In summary 59 bears born and survive each year and a mortality rate of around 90 means the population is declining and will continue to decline. I oppose removing the GYE Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife	FWS-R6-ES-2016-0042-2989	
If they are delisted they will be subject to being shot by some sick trophy hunter or other person with a gun who hates all predators and doesn't understand their role in healthy ecosystems. Grizzlies are just beginning to recover. Please don't abandon them the way you are trying to abandon wolves. Please rely on science and don't give in to politics and political pressure. The Endangered Species Act is one of the most important acts America ever passed and it must be used as it was intended - for the protection of all endangered species including grizzlies.	Factor B	I am totally opposed to the delisting of grizzly bears at this time. Their population remains small. Like so many other animals, they will be impacted by climate change and we don't yet know how badly. Grizzlies don't know where the boundaries of Yellowstone National Park are. If they are delisted they will be subject to being shot by some sick trophy hunter or other person with a gun who hates all predators and doesn't understand their role in healthy ecosystems. Grizzlies are just beginning to recover. Please don't abandon them the way you are trying to abandon wolves. Please rely on science and don't give in to politics and political pressure. The Endangered Species Act is one of the most important acts America ever passed and it must be used as it was intended - for the protection of all endangered species including grizzlies.	FWS-R6-ES-2016-0042-3034	

These same state managers will also decide what types of hunting methods will be allowed. We must fight off any attempt to allow cruel and unsporting methods, such as hunting over bait and chasing bears with packs of GPS collared hounds. Trophy hunters, outfitters and guides, as well as livestock producers have been calling for grizzly hunting seasons for years. In fact, these wildlife managers have already laid plans to parcel out the GYE grizzlies to trophy hunters if they are delisted. Allowing these bears to be hunted would not only result in the direct deaths of the grizzlies who end up as rugs, but also the bears who escape the hunt and die from related injuries, as well as orphaned cubs unable to survive on their own. When hunting is allowed during the Fall, when the grizzlies are eating heavily to gain weight for hibernation, this costs the bears precious energy. This cost early in a female's life may negatively impact a lifetime of reproduction. Hunting directly affects population growth rates and can indirectly affect sex and age structure of a population and change social organization. Hunting causes greater changes in a population than do natural processes.	Factor B	I am very disturbed to hear that the US Fish & Wildlife Service is considering the delisting of grizzly bears in the Great Yellowstone Ecosystem (GYE). According to statistics, at one time, grizzly bears ranged from northern Mexico to Alaska. In the early 1800s, as many as 50,000 grizzlies were found in the lower 48 states. Through hunting, humans have largely killed them off. Human-caused mortality is the single largest contributor of bear deaths. Today, their number has dropped to between 1,400 and 1,700. Of these numbers, only 674 to 839 are believed to be in the GYE in 2014. Even that small number may be an over-count, according to some biologists. We must protect these grizzly bears from extinction. If Federal protections are removed, state managers will open hunting seasons on GYE grizzly bears. The Idaho, Montana, and Wyoming wildlife managers will be responsible for what happens to these grizzlies. Many federal judges themselves have commented on how poorly these managers handled the wolf situation in their areas. These same state managers will also decide what types of hunting methods will be allowed. We must fight off any attempt to allow cruel and unsporting methods, such as hunting over bait and chasing bears with packs of GPS collared hounds. Trophy hunters, outfitters and guides, as well as livestock producers have been calling for grizzly hunting seasons for years. In fact, these wildlife managers have already laid plans to parcel out the GYE grizzlies to trophy hunters if they are delisted. Allowing these bears to be hunted would not only result in the direct deaths of the grizzlies who end up as rugs, but also the bears who escape the hunt and die from related injuries, as well as orphaned cubs unable to survive on their own. When hunting is allowed during the Fall, when the grizzlies are eating heavily to gain weight for hibernation, this costs the bears precious energy. This cost early in a female's life may negatively impact a lifetime of reproduction. Hunting directly affects population growth rates and can indirectly affect sex and age structure of a population and change social organization. Hunting causes greater changes in a population than do natural processes. Sixty percent of prominent grizzly bear scientists "believe delisting would be an incorrect decision, or at the very least a violation of the precautionary principle." Who are we to argue with the experts? Climate change and the loss of important food sources also concern bear biologists. If the cause of these beautiful animals is not enough to trouble you and persuade you to support their interests, keep in mind that Millions of grizzly-bear watching tourists spend tens of millions of dollars each year benefitting the local economies of the Northern Rockies. With the loss of its bears, Yellowstone National Park could lose \$10 million tourism dollars annually. (Source: National Geographic)	FWS-R6-ES-2016-0042-3100
As a wildlife biology and management major, I understand the importance of carrying capacity in wildlife. It is important that we manage the bears rather than letting their numbers run loose so that the population doesn't increase too much. Therefore we should be able to determine a reasonable population of bears and hunt them to keep them there. The grizzlies are at the top of the food chain, besides humans, so they aren't going to be in danger from other animals. They are in danger from themselves because if there is too high of a population they will start depleting all of the resources.	Factor B	I support delisting the grizzly bear. As a wildlife biology and management major, I understand the importance of carrying capacity in wildlife. It is important that we manage the bears rather than letting their numbers run loose so that the population doesn't increase too much. Therefore we should be able to determine a reasonable population of bears and hunt them to keep them there. The grizzlies are at the top of the food chain, besides humans, so they aren't going to be in danger from other animals. They are in danger from themselves because if there is too high of a population they will start depleting all of the resources. Hunting is not something that should be taken away from us, so we need to share the available prey with them. Having too many top predators would reduce our ability to hunt because there will be smaller populations of prey. To keep the prey, such as elk, at optimal population numbers you would reduce our right rather than reducing the amount of bears. I think this is wrong. Yes we should have predators, but we shouldn't allow them to over populate. Right now, my step father lives in Wapiti, Wyoming, which most people know is on the main route the the east entrance of Yellowstone. Wapiti is highly colonized by people, and grizzlies share that habitat too. In the past several years, grizzlies have become more and more of a problem with the people living here. There is numerous amounts of wilderness lands around Yellowstone that should allow the bears to live comfortably. When bears and humans start having conflicts in developed areas I think we have a problem. I'm not saying bears will never be around humans, but when they are causing problems and government agencies are constantly moving, trapping, or killing bears this should be a red flag. There is a grizzly bear recovery zone set aside just for them. The bears are now well past those boundaries and expanding quickly. There is no reason to say they have not recovered and no longer need protection especially when the population has exceeded the target 500 bear goal by almost double. I grew up hunting, fishing, and camping on horses in the wilderness of Shoshone National Forest, and I have been face to face with grizzly bears. Those who want to protect them should have to go into an elk camp in September in the Thorofare and stay there for the month. After that experience, then I will listen to what they have to say. Every outfitter knows the struggles of the grizzlies in their camps, around their horses, clients, and carcasses. Bear advocates want to group outfitters as bear haters, but if they lived in the outfitter's shoes for a year, they might think differently too. Not to say they are bear haters, it's just another problem to stack onto their extremely high daily load of duties. Simultaneously, every once in a while there is a habituated grizzly bear that causes a problem, charges, or endangers someone's life in the background. These bears should not be given more than one charge, but with	FWS-R6-ES-2016-0042-3160

I wanted to alert you to a devastating development that threatens one of America's great wildlife icons--the grizzly bear of Yellowstone. Without our help, these magnificent animals, which used to roam throughout much of the West (including California and now remain only on our state flag) could be subject to trophy hunting within a few months! Å	Factor B	I wanted to alert you to a devastating development that threatens one of America's great wildlife icons--the grizzly bear of Yellowstone. Without our help, these magnificent animals, which used to roam throughout much of the West (including California and now remain only on our state flag) could be subject to trophy hunting within a few months! You may recall that 10 years ago the George W. Bush administration decided to delist the grizzly bear in the Greater Yellowstone Ecosystem, thus removing protections provided by the Endangered Species Act. Environmentalists, wildlife lovers and animal protection groups sprung into action. After thousands of Americans submitted comments protesting the delisting, the courts ruled in our favor and the proposal was abandoned. An Op Ed I wrote in 2006 for the San Francisco Chronicle as the Sierra Club national president offered a list of compelling reasons for why grizzlies needed to remain protected under the ESA. Fast forward 10 years. The U.S Fish and Wildlife Service has once again proposed to delist the Yellowstone grizzly! It's still a terrible idea for all of the same reasons...climate change, food scarcity, genetic isolation, threats of trophy hunters, and loss of habitat due to development and other human activities. We believe grizzlies should remain protected under the ESA!	FWS-R6-ES-2016-0042-3201	
The population of grizzly in the GYE has not recovered enough to sustain itself once hunting is allowed, and particularly if trophy hunting is allowed. It's disgusting to me that FWS has spent 40 years recovering the population and wants to squander it away in a couple years - which is all it will take, if that.	Factor B	Regarding Delisting the grizzly in the Greater Yellowstone Ecosystem - I am opposed to delisting the grizzly in the GYE. The population of grizzly in the GYE has not recovered enough to sustain itself once hunting is allowed, and particularly if trophy hunting is allowed. It's disgusting to me that FWS has spent 40 years recovering the population and wants to squander it away in a couple years - which is all it will take, if that. Quoted from David Mattson (who has spent 20 years studying the GYA grizzly) on Montana Public Radio, "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS is ignoring poll numbers that the Humane Society of US and Wyoming Wildlife Advocates showing that 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. And, more than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. In addition, 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. This is not the right time for delisting the grizzly. They stand little chance in the current climate to increase or actually even maintain their population should delisting occur.	FWS-R6-ES-2016-0042-3245	

It is clear that the threats that caused the grizzly bear to become endangered still exist today. The states have shown they can not manage grizzly bears responsibly with trophy hunts already planned in anticipation of delisting.	Factor B	I am adamantly opposed to the delisting of the grizzly bear. It is clear that the threats that caused the grizzly bear to become endangered still exist today. The states have shown they can not manage grizzly bears responsibly with trophy hunts already planned in anticipation of delisting. Climate change also poses an additional threat to grizzly bears within the Greater Yellowstone Ecosystem.	FWS-R6-ES-2016-0042-3246	
Grizzly bears face multiple threats to persistence including the loss of their primary food resources. Currently, whitebark pine seeds, native cutthroat trout, huckleberries, army cutworm moths, elk and bison are either declining and/or are expected to decline in the foreseeable future as a result of habitat loss, climate change, drought, invasive species and other anthropogenic causes. Traditionally, whitebark pine seeds have provided a core dietary staple for grizzly bears. Yet, the whitebark pine, a species the FWS agrees warrants federal protection, is in decline because of a variety of problems. Another key source of sustenance, the cutthroat trout, has stopped spawning in all tributaries of Yellowstone Lake. Army cutworm moths, a staple for grizzly bears since the late 1990s, could likely disappear because they nectar on tundra flowers, which are highly vulnerable to global warming. Berries have become largely unavailable to grizzly bears due to warming summer temperatures and drought severity since at least 2005. These food failures have caused whitebark pine, cutthroat trout, huckleberries to have caused grizzly bears to switch to a more meat-based diet, including domestic livestock.	Factor B	Please see the attached comment letter. I urge FWS not to remove grizzly bears from protections under the ESA, and I strongly oppose trophy-hunting of grizzly bears. Attachments Oppose grizzly delisting_comment letter_May 2016	FWS-R6-ES-2016-0042-3274	

Critics also say that delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that FoA and local tribes, oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009	Factor B	"Critics of the USFWS proposal say that lifting protections for the bear could endanger a growing population. The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to an estimated 700 or more today. But grizzly bears have all but disappeared from almost all of the continental United States, except for Yellowstone and Glacier National Park and a few other slivers of habitat, the New York Times reported May 3. "Critics also say that delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that FoA and local tribes, oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. "We cannot let human behavior and stupidity jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. "Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. "With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. "Even the author of the report that led to the delisting proposal, Dr. Christopher Servheen, grizzly bear recovery coordinator, U.S. Fish and Wildlife Service, admits private land development is the greatest threat to the nation's grizzlies, as further development could cut off connectivity among populations and disrupt vital habitat."	FWS-R6-ES-2016-0042-3328	
I strongly oppose de-listing. I think the shift to Idaho-Montana-Wyoming state management of the Grizzly Bear in the Greater Yellowstone Ecosystem would be a misguided action based on an overly optimistic view of the wildlife management capabilities of the states involved. In my view, a hunting season on the Grizzly Bear is an abhorrent prospect. I am not opposed to hunting wildlife species that are far more plentiful than the Grizzly Bear. But I believe there are some relatively rare, vulnerable-to-human-impact, and majestic species that should be left alone. The Grizzly Bear is one of them.	Factor B	See Attached Attachments Fischer Doris	FWS-R6-ES-2016-0042-3387	

The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that FoA and local tribes, oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. Å	Factor B	Delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that FoA and local tribes, oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. We cannot let human behavior and stupidity jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. - See more at: https://secure.friendsofanimals.org/news/2016/may/tell-usfws-not-remove-protections-yellowstone-grizzly-bear#sthash.AacfEZ1q.dpuf	FWS-R6-ES-2016-0042-3389	
To allow hunters to shoot them for 'sport' as soon as they leave the park would be a tragedy. Over 95% of their range was taken from them.	Factor B	How we as a society can even CONSIDER ending the protection of one of our great large predators is hard to understand. This planet was meant to be shared, and to constantly strive to protect and promote human beings has consistently led to the extinction or near extinction of many other species. If anything needs 'managing' in the park, it should be humans themselves. I've visited Yellowstone many times, (and will be back over Memorial Day). If I was told that there was a limit on how many people could enter the park every year to maintain the safety of both humans and bears, I'd be more than fine with that. I've only had the great pleasure of seeing a grizzly bear there once. And from quite a distance. To deem that 700 bears within 2 million acres is too many sounds ludicrous. To allow hunters to shoot them for 'sport' as soon as they leave the park would be a tragedy. Over 95% of their range was taken from them. To not allow these few hundred bears to live in peace, and yes, hopefully grow in numbers, is unconscionable. How can we be so miserly?	FWS-R6-ES-2016-0042-3404	

also having spent the previous 40 years observing wild Grizzly Bears in the region I vehemently object to FWS alarming & disturbing attempt to sell its fiction of YGB recovery to a highly attuned and skeptical public on delisting of the YGB, a population clearly in decline, from ESA, this is dangerous and irresponsible also egregiously deficient in its unreferenced claims by not using the “best available science” as required by law. Over 70 grizzlies were killed by human activity, 10% of the known pop in the midst of millennial drought 2015 the hottest year on record for an animal with the slowest reproductive rate in North America. Vast declines in cutthroat trout, elk & moths causing YGB to redistribute itself in search of food which unnaturally fragments & divides the animals numbers by the extent of their redistribution (Mattson 2016) yet FWS density data could never reflect this as a result its conflated aerial counts of pop estimates. FWS says new food sources will do for them but all that awaits YGB in delisting is the gun barrel of the trophy hunter, now is not the time for YGB pop in trouble to be harvested for the entertainment of others. FWS ostensibly tells the public there’s no more room for bears which contradicts the very spirit of ESA while undermining the intent of the law FWS is entrusted with by the people!	Factor B	See attached file(s) Attachments Comment on Grizzly Bear Delisting 5.10.16	FWS-R6-ES-2016-0042-3434	
FWS has exclusive monopoly on raw data on YGB, data that is owned by taxpayers that FWS refuses to release. Without free and unhindered access to data how can the public possibly trust FWS with our bears? In its haste to delist FWS conspicuous omissions look to be for the sole purpose of supporting its agenda to give bear management to the states where a trophy hunt aka “discretionary mortality” is already for sale. \$150 per head is Americas return on investment. FWS is entirely overly optimistic when monopolizing the publics data by making unproven assertions of secure environment for YGB while dismissing impact of highly dynamic factors ie Anthropogenic Climate Change (ACC) “therefore we conclude that the effects of climate change do not constitute a threat to the GYE Grizzly Bear now, nor is it anticipated to in the future” declaring that ACC “effects may even make habitat more suitable and food sources more abundant” (Servheen 2010 p4) so FWS is endorsing ACC now, great just what we need more catastrophic ACC for YGB even as ample evidence of ACC is sighted in the Rule (13216-13217). Schizophrenic, FWS still says no problem YGB are adaptable yet with no supporting evidence provided. YGB requires seasonally reliable highly nutritional foods to sustain itself which FWS does not identify. The YGB is evolutionarily unique and isolated pop with distinct ancient ties to a Yellowstone now in the midst of deteriorating environmental conditions from ACC, excessive unsustainable human caused mortality, declining foods evidenced in terminal White Bark Pine seed , fragmented pops from impaired habitat, long term deleterious trends to carrying capacity and victims of FWS overestimates that contain no scientific accountability, inaccurate misleading pop estimates, no connectivity to NCDE effecting long term genetic viability species. Pop dynamics is a body of solidly grounded dynamical systems theory with governing principles of best science which FWS dismisses out of hand. FWS says pop numbers are high enough to delist w/o citing pop critical aspects pertinent to delisting ie reproductive delays eroding YGB pop dynamics. Pop growth= Births--Deaths. Very damaging pared with loss of critical foods --sudden and dramatic collapse. This is particularly true since the ingredients for complex dynamics are so prevalent and obvious in YGB. If FWS wants publicity for its delisting proposal well they’re certainly going to get it. FWS has no science based conclusions instead its conclusions are backwards march away from ACC & White Bark Pine Seed (WBPS). How could FWS confuse WBP trees with WBP seeds in the Rule? YGB does not eat trees they eat seeds! This was the YGB most sustainable nutritional food that is now endangered itself if not terminal. FWS has completely bungled then conflated data so horribly then proceeds to cover their tracks by scapegoating the YGB because of their single minded and unforgivable deadly mistakes. The core of the ecosystems carrying capacity has been in decline since the 1990s causing the diaspora of YGB in search of food escalated by the decline of WBPS. Reliance on meat caused death rates to soar bringing YGB into contact with intolerant and well armed humans putting the YGB pop @ a tipping point.	Factor B	See attached file(s) Attachments Comment on Grizzly Bear Delisting 5.10.16	FWS-R6-ES-2016-0042-3434	

Excessive, unsustainable mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. As these levels of mortality have occurred with federal protection, the removal of such protections can only be expected to have a further detrimental impact. Further, Idaho, Montana, and Wyoming, now responsible for protection of the grizzlies are either hostile to co-existence with large carnivores or view them only as a revenue generating commodity which is not conducive to any notion of protection. There is little to no evidence to support the notion that sustainable levels of mortality have been achieved or maintained in order to deem the population recovered. This evidence is essential before any decisions and assessments can be made.	Factor B	Please see below Attachments 160507 Grizzly bears	FWS-R6-ES-2016-0042-3400	
Clearly delisting means hunting as the plans are already in motion in Wyoming. And just as clearly, with the popularity of female bear number 399 and her importance to the tourism industry, she will be high on the list for trophy hunters.	Factor B	I am opposed to delisting grizzly bears in the Yellowstone Grand Teton Ecosystem (YGTE) at this time and providing my comments below as well as questions regarding the delisting proposal. There is no compelling reason for delisting and reducing the number of grizzly bears when the relatively small isolated and genetically impaired population in the YGTE is dependent on many rapidly changing variables. The trend is not favorable for a healthy grizzly population with the adverse impacts of shrinking habitat due to human encroachment and the annual toll of human caused deaths. In addition it is difficult to deny the adverse impacts climate change and other causes is having on critical food sources. There is little consensus on the actual population of grizzlies in the YGTE, but what is known is that only about 25% of the population is composed of breeding females, perhaps as few as 150.. With low reproduction rates, female bears are critically important in maintaining the population. How can anyone predict a robust future for a recovering species when there are so many variables and so many unknowns? How will delisting followed by hunting as Wyoming is planning, improve the long term survival of this iconic animal? How will killing members of a recovering species improve the genetics and predictability of the population dynamics? Clearly delisting means hunting as the plans are already in motion in Wyoming. And just as clearly, with the popularity of female bear number 399 and her importance to the tourism industry, she will be high on the list for trophy hunters. Several guides and individuals who want a bear skin rug and her stuffed head gathering dust in their den have made it clear that she is a prime target. Why put her life at risk when she has a huge fan base around the world? Since 399's habits are well documented, her den site is known, she is accustomed to seeing humans watching her, and she has a tracking collar - she is a dead duck. The USFWS knows that as well as everyone else. Without question she will be one of the first to go. There are other bears whose habits are well known. They are not causing problems but they along with 399 will be killed. Killing of these bears cannot be classified as hunting as there is no hunting required, it is just killing without any purpose other than to deprive others of seeing beautiful bears like 399 in the wild. And what happens if she or other bears are wounded in the killing free for all? Not one person will go hungry if these bears are not killed, however the world will be a much poorer place. This is a tragedy that does not have to happen. It is well known that the YGTE is an island with little connectivity to the rest of North America. The result is a genetic bottleneck and a current and long term threat to the health of the grizzly population. How will allowing the random killing of grizzlies with no concern for the lost genetics or even the sex of the bears improve the gene pool in the YGTE? How will creating a mate around the YGTE	FWS-R6-ES-2016-0042-3473	

Since 399's habits are well documented, her den site is known, she is accustomed to seeing humans watching her, and she has a tracking collar - she is a dead duck. The USFWS knows that as well as everyone else. Without question she will be one of the first to go. There are other bears whose habits are well known. They are not causing problems but they along with 399 will be killed. Killing of these bears cannot be classified as hunting as there is no hunting required, it is just killing without any purpose other than to deprive others of seeing beautiful bears like 399 in the wild. And what happens if she or other bears are wounded in the killing free for all? Not one person will go hungry if these bears are not killed, however the world will be a much poorer place. This is a tragedy that does not have to happen.	Factor B	I am opposed to delisting grizzly bears in the Yellowstone Grand Teton Ecosystem (YGTE) at this time and providing my comments below as well as questions regarding the delisting proposal. There is no compelling reason for delisting and reducing the number of grizzly bears when the relatively small isolated and genetically impaired population in the YGTE is dependent on many rapidly changing variables. The trend is not favorable for a healthy grizzly population with the adverse impacts of shrinking habitat due to human encroachment and the annual toll of human caused deaths. In addition it is difficult to deny the adverse impacts climate change and other causes is having on critical food sources. There is little consensus on the actual population of grizzlies in the YGTE, but what is known is that only about 25% of the population is composed of breeding females, perhaps as few as 150.. With low reproduction rates, female bears are critically important in maintaining the population. How can anyone predict a robust future for a recovering species when there are so many variables and so many unknowns? How will delisting followed by hunting as Wyoming is planning, improve the long term survival of this iconic animal? How will killing members of a recovering species improve the genetics and predictability of the population dynamics? Clearly delisting means hunting as the plans are already in motion in Wyoming. And just as clearly, with the popularity of female bear number 399 and her importance to the tourism industry, she will be high on the list for trophy hunters. Several guides and individuals who want a bear skin rug and her stuffed head gathering dust in their den have made it clear that she is a prime target. Why put her life at risk when she has a huge fan base around the world? Since 399's habits are well documented, her den site is known, she is accustomed to seeing humans watching her, and she has a tracking collar - she is a dead duck. The USFWS knows that as well as everyone else. Without question she will be one of the first to go. There are other bears whose habits are well known. They are not causing problems but they along with 399 will be killed. Killing of these bears cannot be classified as hunting as there is no hunting required, it is just killing without any purpose other than to deprive others of seeing beautiful bears like 399 in the wild. And what happens if she or other bears are wounded in the killing free for all? Not one person will go hungry if these bears are not killed, however the world will be a much poorer place. This is a tragedy that does not have to happen. It is well known that the YGTE is an island with little connectivity to the rest of North America. The result is a genetic bottleneck and a current and long term threat to the health of the grizzly population. How will allowing the random killing of grizzlies with no concern for the lost genetics	FWS-R6-ES-2016-0042-3473	
Mortality of grizzly/brown bear in and around the Yellowstone ecosystem has remained high due to road/railroad mortality, poaching, lethal control (ranchers etc), and conflicts with deer and elk hunters.	Factor B	Greetings Wildlife Managers, Thank you for accepting my comments to your agency's proposed delisting of the Yellowstone Grizzly bear population. Let me begin by saying that reducing protections for any population of grizzly bears is absolutely unwise, ludicrous and will backfire into a orgy of killing and extinction that is already plaguing this and all other apex predators worldwide. Ecological security for brown/grizzly bears and essentially all other apex predators worldwide is rapidly evaporating due to continued rapid human population growth and development in areas where brown/grizzly bears had previously flourished, creating islands of habitat that will shortly isolate and extinguish bear populations. Apex predators (tigers, bears, wolves etc) are in serious decline worldwide due to the very same pressures that have unravelled the Yellowstone (and all other) grizzly/brown bear populations. Grizzly/brown bears are absent in Mexico, most of north America and throughout Europe and Asia where they have flourished up until this last century. It is absolutely imprudent to take any step that does not further safeguard this species. Like the tremendously ugly fight and delisting (that required congressional riders from the republican congress) for several north American wolf population, it is clearly evident that these efforts are being fueled by powerful hunting and ranching interests possessing vast political influence, not the best interest of the species, ecosystem or the human population. Just because this sub-population of bears has risen slightly above there near extirpation levels several decades ago, they are absolutely still in a serious state of risk and decline across the landscape. Development, road use, food availability (partially due to the significant loss of whitebark pine in and around the ecosystem and competition with sporthunters and ranchers for other food sources). Mortality of grizzly/brown bear in and around the Yellowstone ecosystem has remained high due to road/railroad mortality, poaching, lethal control (ranchers etc), and conflicts with deer and elk hunters. In my view, management of an extremely vulnerable species like the Yellowstone grizzly should be carried out using a serious precautionary premise where no protections are lifted for the species and efforts are vastly escalated to connect bear populations, reduce conflicts with hunters and ranchers, end road/railroad mortality and prevent all further development/habitat loss of adjacent habitats associated with Yellowstone. If delisting of this majestic species occurs during the Obama administration, the legacy of a failed and bloodied conservation effort will be a blight on the memory of your agency and the presidency. I implore you to suspend efforts to reduce protections (delist) for this species and to reverse course and focus unprecedented resources into habitat acquisition, habitat connectivity, conflict reduction and vastly increasing penalties for poaching.	FWS-R6-ES-2016-0042-3520	

FWS claims there is a large and healthy population of bears but scientists and even the former NPS superintendent of Yellowstone have questioned the studies numbers and methodology. FWS is also claiming bears are not suffering adversely from the loss of 2 major food sources, the cutthroat trout and whitebark pine. It is too early to be sure what long term affect this will have on the bears but 2015 was a record year for Grizzlies killed around Yellowstone and as bears are forced out of the national park in search of food they will be left vulnerable to being shot without protections imparted by the endangered species act. Delisting the grizzly bears could result in decades of recovery work being lost in a few short years under state management which will allow trophy hunting, according to a memo between the states widely circulated in the media.	Factor B	I am opposed to the delisting of the Yellowstone grizzly bear. As a long time resident and guide in Yellowstone National Park I have serious concerns about the future of the grizzly bear and the sustainability of their population. FWS claims there is a large and healthy population of bears but scientists and even the former NPS superintendent of Yellowstone have questioned the studies numbers and methodology. FWS is also claiming bears are not suffering adversely from the loss of 2 major food sources, the cutthroat trout and whitebark pine. It is too early to be sure what long term affect this will have on the bears but 2015 was a record year for Grizzlies killed around Yellowstone and as bears are forced out of the national park in search of food they will be left vulnerable to being shot without protections imparted by the endangered species act. Delisting the grizzly bears could result in decades of recovery work being lost in a few short years under state management which will allow trophy hunting, according to a memo between the states widely circulated in the media. As a guide in Yellowstone park, I rely on wildlife being visible for my clients. Delisting the grizzly is bad for bears, bad for business and wrong for Yellowstone.	FWS-R6-ES-2016-0042-3544	
Trophy hunting is indiscriminate and unnecessary. Between climate concerns and wasteful hunting, the species could easily be returned to the brink of extinction.	Factor B	I am not in favor of removing the Greater Yellowstone population of Grizzlies from the endangered and threatened list. We do not know what impact global warming will have on this limited species in the future. Trophy hunting is indiscriminate and unnecessary. Between climate concerns and wasteful hunting, the species could easily be returned to the brink of extinction. We need to preserve our wildlife for future generations.	FWS-R6-ES-2016-0042-3555	

There is also no need for depredation hunts, as to my knowledge there is no significant grizzly activity that is causing widespread damage to human or domestic livestock.	Factor B	I am asking you to reconsider your proposal about removing the Greater Yellowstone Area (GYA) population of grizzly bears from the List of Endangered and Threatened Wildlife. Even though the GYA bear population as grown to an estimated 700 animals, with some estimates giving higher number, I believe this number may not be high enough to consider reducing the population through hunting. Currently the whitebark pine in the GYA area which is a main food source for the bears has been greatly reduced due to the mountain pine beetle. With the effects of climate change, further food sources and habitat areas for the grizzlies may be diminished in the future. Genetic diversity in the GYA grizzly population may also be significantly affected if the population is allowed to be reduced to 500 animals. A FWS talking points paper on this issue states that if the population falls below 500, the Montana FWP would transplant bears from other areas to maintain genetic diversity. Why not let the GYA grizzly population grow to a point where the genetic diversity is robust enough, then reconsider the delisting options. One study states that it may take a population of 1850 animals to maintain adequate genetic diversity. Please understand that I am not opposed to hunting, and have hunted big game wildlife in the past. However I see no practical need to hunt grizzly bears. This is trophy hunting only, nothing more, nothing less. Even though the USFWS has approved management plans from the states of Montana, Wyoming, and Idaho, what assurances are there that any or all of these states won't make changes to these plans that would have considerable negative impacts on the grizzly population. There is also no need for depredation hunts, as to my knowledge there is no significant grizzly activity that is causing widespread damage to human or domestic livestock. The growing robust grizzly population is a good thing, and the USFWS should be commended for taking the steps that have allowed this to happen. With this growth comes the inevitable increase of human/grizzly encounters. With more people than ever visiting the Yellowstone area and more bears, this is a predictable situation. However much of the responsibility for these encounters has to be placed on humans. We are visiting the bears habitat, and need to learn to respect that. If humans go out and do stupid things like approach bison or enter bear habitat areas without taking the necessary precautions, it should not be the animals who are blamed and hunted. Finally, it is ironic to me that on the USFWS home web page the winning poster for the 2016 Saving Endangered Species Youth Art Contest. It's hard to miss the grizzly right in the middle of the poster. It would be a shame if the GYA grizzly population is placed right back on the Threatened and Endangered Wildlife List again in the near future because a delisting decision was made to ease. Please reconsider this proposal and leave the GYA grizzly population on the list.	FWS-R6-ES-2016-0042-3599	
Opening up these populations to hunting would quickly bring down numbers to a more critical level. Thank you.	Factor B	I would like to see the grizzly bear remain on the Endangered species list in the lower 48 states. It seems that although their numbers may be stable or even growing, they are genetically isolated enough through habitat fragmentation. Opening up these populations to hunting would quickly bring down numbers to a more critical level. Thank you.	FWS-R6-ES-2016-0042-3765	

Unprotected bears, wandering outside of the park in search of food only to find the end of a rifle may lead to a much larger reduction in population than the FWS is proposing with its 675 target, especially since humans can already kill grizzlies they perceive to be a threat to their life or property.	Factor B	I am against delisting the GYE grizzly bear. Climate change will continue to alter habitat and affect food sources, along with impacts to behavior, seasonal shifts, among other unknowns. Two important bear foods in the GYE, Whitebark pine and westslope cutthroat trout, continue to decline due to climate change and competition with invasives. Although bears are opportunistic eaters, the GYE is not very abundant or diverse in its food sources. Fewer natural food sources to choose from mean that grizzly bears will likely be forced out of the protected boundary in search of other food items that may get them into trouble, such as cattle and garbage. Unprotected bears, wandering outside of the park in search of food only to find the end of a rifle may lead to a much larger reduction in population than the FWS is proposing with its 675 target, especially since humans can already kill grizzlies they perceive to be a threat to their life or property. Now is not the time to remove GYE grizzly bears from protection, when climate change will only continue to raise temperatures and cause additional impacts yet to be identified. I am against delisting the GYE grizzly bear. The unknown impacts of climate change are far too great to not be adequately taken into account when proposing delisting. USFWS suggest that all bear foods are equal and can easily be interchanged, however, this is not the case. Whitebark pine nuts are high in protein and, when they were still in abundance, low in energy loss. Scientists have yet to find an alternative equivalent to the high protein, low caloric output in the GYE. Additionally, grizzly bears are among the slowest reproducing land mammals in North America and females undergo delayed implantation. If a female grizzly has mated but does not put on enough pounds over the summer months to sustain and bear the energetic costs of pregnancy during hibernation, the blastocyst will not implant in her uterus and she will not give birth. Thus without adequate food sources, it will be very difficult for female GYE grizzly to reproduce and sustain the population.	FWS-R6-ES-2016-0042-3861	
If the Greater Yellowstone Ecosystem grizzly population is de-listed, their management will transfer to the states of ID, WY, and MT, where they will be slaughtered at the hands of trophy hunters.	Factor B	Please see attached letter and please do not de-list the Greater Yellowstone Ecosystem grizzlies. Attachments Grizzly_08May2016	FWS-R6-ES-2016-0042-3888	

Their population is not even fully recovered, they are struggling with loss of food due to climate change. They reproduce so slowly this will devastate their not yet fully recovered population. The ESA was not designed to have animals taken off and immediately hunted! Trophy hunted... Only 33% of hunters even want this and we should not be catering to them, but rather look at the numbers , understand the grave impact and do not delist them.	Factor B	I do not believe grizzly bears should be taken off of the endangered species list. Their population is not even fully recovered, they are struggling with loss of food due to climate change. They reproduce so slowly this will devastate their not yet fully recovered population. The ESA was not designed to have animals taken off and immediately hunted! Trophy hunted... Only 33% of hunters even want this and we should not be catering to them, but rather look at the numbers , understand the grave impact and do not delist them. Thank you.	FWS-R6-ES-2016-0042-3935	
I support delisting of the Grizzly. Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. If hunting the Grizzly is allowed, Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600.	Factor B	I support delisting of the Grizzly. Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. If hunting the Grizzly is allowed, Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600.	FWS-R6-ES-2016-0042-3939	

Removing them from the Endangered and Threatened Wildlife list puts not only their species, but other species at risk due to decreased hunting regulations. Please keep this important species on the Endangered and Threatened Wildlife list: By doing so, you help maintain ecosystem balance for subsequent generations to enjoy.	Factor B	Grizzly bears are a keystone species, and their populations are an important part of the ecosystem of Yellowstone. Removing them from the Endangered and Threatened Wildlife list puts not only their species, but other species at risk due to decreased hunting regulations. Please keep this important species on the Endangered and Threatened Wildlife list: By doing so, you help maintain ecosystem balance for subsequent generations to enjoy.	FWS-R6-ES-2016-0042-3962	
With regard to the state agencies, their orientation toward wildlife overwhelmingly is in favor of to what degree a species can be exploited for human use. In the case of the grizzly this would predominantly come from trophy hunters, who for some deep dark reason that doesn't speak well of our humanity, want a mounted dead grizzly to grace their homes. The political pressures will always be there. Presently we are undergoing the sixth mass extinction in the earth's history. It is the only one that has been caused by a species - ours. We do not need to be taking any actions that exacerbate this situation, which the removal of Federal protections from the grizzly will do. We should instead be taking those steps that serve to preserve the ecological integrity we have remaining. In the strongest terms I urge you to maintain the Federal protections for the grizzlies of the Greater Yellowstone Ecosystem.	Factor B	I am writing to as a retired National Park Service Ranger that worked in Yellowstone for decades as well as one who is the holder of a graduate degree in biology. I witnessed and participated in the long struggle to bring the grizzly back from the perilous population status it faced prior to Federal protection. If for no other reason other than the grizzlies very low reproductive rate and taking in account the numerous causes of fatalities it is subject to I am utterly convinced that the removal of the grizzly from Federal protection and turning over its management to the states would be a very bad decision. Removal of protection would be a huge step backwards and will only serve to threaten the continued existence of a healthy and viable grizzly population in the Greater Yellowstone Ecosystem. Additionally, this is an animal which has a very small degree of genetic diversity, with extremely limited immigration and emigration from the population. This heightens the animal's vulnerability to individual threats to it. I am also quite familiar with the political realities present in the state legislatures, on the governors of the states, and within the respective state agencies charged with the management of wildlife. I have commented before the legislature in Montana in various wildlife bills and fully appreciate the constituency they respond to and the lack of knowledge on the issue on the part of the vast majority of legislators. With regard to the state agencies, their orientation toward wildlife overwhelmingly is in favor of to what degree a species can be exploited for human use. In the case of the grizzly this would predominantly come from trophy hunters, who for some deep dark reason that doesn't speak well of our humanity, want a mounted dead grizzly to grace their homes. The political pressures will always be there. Presently we are undergoing the sixth mass extinction in the earth's history. It is the only one that has been caused by a species - ours. We do not need to be taking any actions that exacerbate this situation, which the removal of Federal protections from the grizzly will do. We should instead be taking those steps that serve to preserve the ecological integrity we have remaining. In the strongest terms I urge you to maintain the Federal protections for the grizzlies of the Greater Yellowstone Ecosystem.	FWS-R6-ES-2016-0042-4215	

GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, they are particularly vulnerable to excessive killing by humans. Last year 59 grizzlies were killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow-reproducing	Factor B	Please do NOT remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife! 1) The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. 2) Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. 3) Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations in particular and with humans in general can be expected as grizzlies are forced to range ever farther looking for food sources to replace those lost in recent years. 4) GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, they are particularly vulnerable to excessive killing by humans. Last year 59 grizzlies were killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow-reproducing species. 5) TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states KNOWN for their hatred of and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and MOST Americans (55%) OPPOSE de-listing. Even more Americans (68%) OPPOSE the hunting of grizzly bears. Thank you, HJ	FWS-R6-ES-2016-0042-4240	
700 individuals may be enough to sustain a safe population, but that number will rapidly collapse due to over-hunting if the animals are removed from the endangered species list. Poaching will be masked by legitimate hunting activity, and there is a significant risk that too many licenses will be issued.	Factor B	700 individuals may be enough to sustain a safe population, but that number will rapidly collapse due to over-hunting if the animals are removed from the endangered species list. Poaching will be masked by legitimate hunting activity, and there is a significant risk that too many licenses will be issued. Even if protections are restored after a population collapse, the bottleneck effect will result in an irreversible loss of genetic diversity that will affect the long-term security of the population. Any action that makes it legal to sell hunting permits for the grizzly bear should be rejected without consideration unless surveillance technology is mandated to eliminate the threat of poaching, and the number of licenses to be issued is determined by an independent panel of ecological researchers.	FWS-R6-ES-2016-0042-4265	

Idaho, Wyoming and Montana are pro-hunting states and won't delay issuing hunting licenses immediately! These creatures would go from full protection to being hunted. They are used to human populations and is equivalent to shooting fish in the proverbial barrel.	Factor B	I OPPOSE DESISTING OF GRIZZLY BEARS! This is the most ridiculous idea ever! I travel to Yellowstone multiple times per year so I can get a glimpse of them in either Yellowstone or Grand Teton. Idaho, Wyoming and Montana are pro-hunting states and won't delay issuing hunting licenses immediately! These creatures would go from full protection to being hunted. They are used to human populations and is equivalent to shooting fish in the proverbial barrel. Americans would never accept hunting of America's bald eagle; hunting Yellowstone grizzly bears is equally unacceptable. To make matters worse, America's great bears face the same looming threats as many species across the country due to climate change. In the last decade, climate change has decimated the Yellowstone grizzly's most important food, the white bark pine nut. Unfortunately, the March 3, 2016, delisting announcement by the U.S. Fish and Wildlife Service (FWS) came paired with an astonishing declaration in the Federal Register: "Therefore, we conclude that the effects of climate change do not constitute a threat to the [Yellowstone grizzly bear population] now, nor are they anticipated to in the future." This statement is even more disturbing in light of your administration's commitment to addressing climate change, because climate change predictions are dire for all our planet's species. How can it be that the military considers climate change in all its decisions, while the agency responsible for our wildlife, the FWS, does not? The same argument - the denial of climate change - was used by the FWS in 2014 to deny listing the wolverine in the lower 48 states. On April 4, 2016, that decision was reversed in federal court, and declared "arbitrary and capricious." The FWS was ordered to reconsider its reasoning about climate change. It's now time for this federal agency to play catch up and use "the best available science" to keep grizzly bears on the ESA list. A critical question: Who benefits from delisting Yellowstone's grizzly bears? The only certain outcome of delisting bears will be trophy hunts in Idaho, Montana and Wyoming. We ask you to instruct our federal wildlife managers to withdraw the March 3 rule and order the FWS to take another look at how climate change impacts grizzly bears. Any decision about the bear's future should be put on hold until independent scientific review can explore potential impacts to bears from climate change. We strongly suspect that America's great bears face a dire future, even with the continued protection of the Endangered Species Act.	FWS-R6-ES-2016-0042-4264	
. States should and do have the right to legislate for conservation in their state. However, because of current factors threatening the grizzlies' habitat and food sources, it is imperative the Fish and Wildlife Service keep the bear under federal protection until its future can be secured. Delisting would subject the bears living outside of the national park system to state run programs allowing for trophy hunting as a means of population control. To do this would be treading on dangerous waters, as hunting and human expansion are what lead to the grizzlies near extinction.	Factor B	See attached file(s) Attachments Alex Public Comment	FWS-R6-ES-2016-0042-4267	

Unprotected bears, wandering outside of the park in search of food only to find the end of a rifle may lead to a much larger reduction in population than the FWS is proposing with its 675 target, especially since humans can already kill grizzlies they perceive to be a threat to their life or property.	Factor B	Not Right I am against delisting the GYE grizzly bear. Climate change will continue to alter habitat and affect food sources, along with impacts to behavior, seasonal shifts, among other unknowns. Two important bear foods in the GYE, Whitebark pine and westslope cutthroat trout, continue to decline due to climate change and competition with invasives. Although bears are opportunistic eaters, the GYE is not very abundant or diverse in its food sources. Fewer natural food sources to choose from mean that grizzly bears will likely be forced out of the protected boundary in search of other food items that may get them into trouble, such as cattle and garbage. Unprotected bears, wandering outside of the park in search of food only to find the end of a rifle may lead to a much larger reduction in population than the FWS is proposing with its 675 target, especially since humans can already kill grizzlies they perceive to be a threat to their life or property. Now is not the time to remove GYE grizzly bears from protection, when climate change will only continue to raise temperatures and cause additional impacts yet to be identified. Thank you!	FWS-R6-ES-2016-0042-4272	
If hunting is allowed, there should be a 5-year moratorium on hunting until states can prove that they can manage the grizzly population effectively. A	Factor B	#NAME?	FWS-R6-ES-2016-0042-4274	

If hunting is allowed, there must be buffer zones around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park. Å	Factor B	#NAME?	FWS-R6-ES-2016-0042-4274	
4. USFWS notes repeatedly throughout the proposed rule that the primary threat facing grizzly bears since their listing (and before) is human-caused mortality. See e.g., 81 Fed. Reg. 13,178; 13,187; 13,200. Yet, the proposed rule provides provisions for state-regulated trophy hunts to occur as soon as the rule is finalized. This makes no sense. Hostile state management focused on trophy hunting and removal of bears that attempt to disperse out of the GYE could quickly reverse population gains and eliminate any possibility of connectivity between bear populations. Last year, the GYE population experienced record-high mortality levels with 59 deaths, 54 of which were likely human-caused. IGBST Mortality Database (2015). Allowing the dramatic increase in mortality that hunting will most likely bring to this population will directly reverse recovery efforts from nearing success to beginning recovery efforts all over again.	Factor B	Thank you for the opportunity to comment on the U.S. Fish and Wildlife Service's (USFWS) proposed rule to remove the Greater Yellowstone Ecosystem (GYE) population of grizzly bears from the federal list of endangered and threatened wildlife (81 Fed. Reg. 13,174 (Mar. 11, 2016)). 1. The proposed delisting rule is premature. Grizzly bears currently occupy less than 1% of their former range and represent only 1% of the pre-European population. The ESA requires that adequate regulatory mechanisms be in place before removing a protected species from the list of endangered and threatened wildlife. 15 U.S.C. 1533 (c); 50 C.F.R. 424.11. These measures ensure continued recovery for the species after federal ESA protections are removed. The proposed rule depends on a conservation strategy and state management plans that do not exist in final form yet. 81 Fed. Reg. at 13,189. 2. USFWS cannot proceed in simultaneously designating the GYE population of grizzly bears as a "distinct population segment" (DPS) under the ESA while also delisting the newly created entity. See 81 Fed. Reg. 13,190; and Humane Soc'y of the United States v. Jewell, 76 F. Supp. 3d 69 (D.D.C. 2014). USFWS may "respectfully disagree[s]" with the court's analysis and interpretation of the agency's DPS policy in Humane Society, 81 Fed. Reg. 13,190, but it cannot ignore the law as it currently stands. 3. The impacts of climate change, loss of vital food sources and the lack of connectivity to other grizzly bear populations in the lower 48 states seriously jeopardize the recovery of grizzly bears in the GYE. USFWS will undermine the recovery of the species as a whole by prematurely removing the federal protections that allowed the GYE population to make a comeback in the first place. 4. USFWS notes repeatedly throughout the proposed rule that the primary threat facing grizzly bears since their listing (and before) is human-caused mortality. See e.g., 81 Fed. Reg. 13,178; 13,187; 13,200. Yet, the proposed rule provides provisions for state-regulated trophy hunts to occur as soon as the rule is finalized. This makes no sense. Hostile state management focused on trophy hunting and removal of bears that attempt to disperse out of the GYE could quickly reverse population gains and eliminate any possibility of connectivity between bear populations. Last year, the GYE population experienced record-high mortality levels with 59 deaths, 54 of which were likely human-caused. IGBST Mortality Database (2015). Allowing the dramatic increase in mortality that hunting will most likely bring to this population will directly reverse recovery efforts from nearing success to beginning recovery efforts all over again. 5. Before delisting, conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock	FWS-R6-ES-2016-0042-4336	

If federal protections are removed from GYE grizzly bears, the states of Idaho, Montana, and Wyoming will rush to open up trophy-hunting seasons. Indeed, these states have already divvied up hunting rights for the bears.¹⁰ Additionally, bears that leave the GYE core habitat would be subject to trophy hunting adopted by state wildlife managers, despite the fact that these dispersing individuals could provide vital connections between other subpopulations, maintaining genetic diversity.¹¹	Factor B	Please accept as part of the record the attached letter, signed by 84 organizations, in opposition to the delisting proposal. This replaces comment tracking number 1k0-8pj9-lrmv. Attachments Yellowstone Grizzly-Sign-on Letter 2016_05.09 84	FWS-R6-ES-2016-0042-4326	
Large-bodied carnivores are sparsely populated across vast areas; they are slow to reproduce, provide extended parental care to their young, and social stability promotes their resiliency. ¹² Human persecution affects their social structure, ¹³ harms their persistence, ¹⁴ and is “super additive” meaning that hunting pressures far exceed what would occur in nature.¹⁵ Hunting mortality has direct effects on population growth rates because of increased mortality, but it can have indirect effects, too, such as disrupting the sex and age structure of a population.¹⁶ Hunting bears during their period of hyperphagia is energetically costly to them as they shift their sleeping patterns and become more nocturnal to avoid being hunted, ¹⁷ and hunting females can influence a lifetime of reproductive success.¹⁸ Females with cubs generally avoid males as a strategy of avoiding sexually-selected infanticide, but this means that they often choose suboptimal habitats, including in closer proximity to humans, and this affects their diet quality and reduces their reproductive potential. ¹⁹ Hunting makes the risk of sexually-selected infanticide greater, which leads to increased avoidance of males by females, and, ultimately, to lower fecundity.²⁰ Right now, an unsustainable number of grizzly bears are dying in the GYE. In 2015, approximately 60 grizzly bears “excluding the bears that agents could not find” are known to have died in the GYE from various causes. ²¹ This is a substantial portion of the estimated population of the slowest-reproducing mammal in North America. Meanwhile, more than half of grizzly bears killed by humans go unreported “from 46 to 66 percent.”²²	Factor B	Please accept as part of the record the attached letter, signed by 84 organizations, in opposition to the delisting proposal. This replaces comment tracking number 1k0-8pj9-lrmv. Attachments Yellowstone Grizzly-Sign-on Letter 2016_05.09 84	FWS-R6-ES-2016-0042-4326	

Trophy hunting without protection is already an issue- hunting will spike if grizzlies are delisted. There is no reason to remove an endangered species from the list unless there is reason to believe they will be able to maintain a safe population number and genetic diversity- and that is simply not the case with highly sought after trophy animals.	Factor B	Trophy hunting without protection is already an issue- hunting will spike if grizzlies are delisted. There is no reason to remove an endangered species from the list unless there is reason to believe they will be able to maintain a safe population number and genetic diversity- and that is simply not the case with highly sought after trophy animals.	FWS-R6-ES-2016-0042-4429	
I am concerned that delisting would give full management authority to the states of Idaho, Wyoming and Montana, which are notoriously hostile to large carnivores. State management guarantees a grizzly bear sport hunt, which is not justified in light of current excessive mortality rates. Further, if grizzly bears are delisted, the states plan to eliminate them in habitat that is critical to their long-term recovery.	Factor B	I write to express my opposition to delisting of Yellowstone grizzly bears, and support of the efforts of Tribes to preserve the iconic and sacred Great Bear. State and federal agencies have not addressed the mounting threats of human development, climate change, invasive species, and the subsequent loss or diminishment of key foods, including whitebark pine seeds, cutthroat trout, and elk. As bears seek out yet more meat to compensate for the collapse of these foods, they are being killed at unsustainably high rates that threaten their survival. I am concerned that delisting would give full management authority to the states of Idaho, Wyoming and Montana, which are notoriously hostile to large carnivores. State management guarantees a grizzly bear sport hunt, which is not justified in light of current excessive mortality rates. Further, if grizzly bears are delisted, the states plan to eliminate them in habitat that is critical to their long-term recovery. Despite significant reductions in the availability of human foods and attractants to grizzly bears, humans are still the number one cause of bear mortality. Instead of delisting, a move that would dry up funds and lower agency commitment to coexistence programs, the Department of Interior should redouble efforts to reduce human-bear conflicts. Delisting is also premature due to the long-term isolation of Yellowstone's grizzly bears. Relying on trucking in bears to deal with the problem of genetic isolation is risky and unwise, especially when it is still possible to naturally reconnect Yellowstone and Northern Continental Divide grizzly bear populations. Restoration of grizzly bears in the vast Selway Bitterroot recovery area would also boost connectivity between Northern Rockies ecosystems. Delisting and sport hunting would undermine prospects for connectivity and permanently isolate Yellowstone's grizzly bears. I support the efforts of a growing coalition of Tribes that is dedicated to protecting Yellowstone's bears and preventing delisting. I ask that you initiate formal consultation with all involved tribes, and promptly correct the disrespectful and dismissive behavior of your staff towards Indian people involved with the grizzly bear issue. The sovereignty of Tribes must be recognized and respected Recovery of the Yellowstone grizzly bear population is achievable, but not if the hard-fought gains of the last 40 years are reversed by delisting. Please do not risk the future of Yellowstone's iconic grizzly bears. Thank you for your consideration	FWS-R6-ES-2016-0042-4399	

Thus they cannot interbreed with other populations nor supplement their numbers from outside the ecosystem. One can hardly call this recovery. Instead we should be reintroducing grizzlies to the extensive public wildlands of Central Idaho. Delisting will mean turning management over to the states of Montana, Wyoming and Idaho, all of whom are drooling over the chance to hunt grizzlies.	Factor B	Hello and thank you for this opportunity to comment on the proposed delisting of the Yellowstone grizzly bear population. I oppose this proposal for many reasons. My comments are dedicated to the memory of Scarface, a magnificent male grizzly who was about 25 years old and was shot and left for dead last fall outside of Jardine, Montana. I have some great memories of watching him - he was a smart and wiley old bear who caused no problems for people, but still got shot. Chris Servheen, the federal coordinator for grizzly bear recovery, is mostly interested in his own career, and delisting is mainly a political and personal objective for him. He is arrogant and selfish and should have been fired long ago. While there is no doubt that grizzlies have come a long way in the Yellowstone area since 1972 when there were maybe 130 left, they have a long way to go. Recovery is in serious jeopardy with at least 70 bears killed last year. Numbers have flatlined and reproduction is probably declining. The population is aging. The Yellowstone ecosystem is under heavy pressure from human population and development, with more wild habitat developed every day. While the heyday of logging and road building has passed, recreational development and activity has skyrocketed. Grizzly habitat is getting crunched. Subdivisions are sprouting up everywhere. I live in Bozeman, where everything is former grizzly habitat (my house included), and the pace of development is mind blowing. Meanwhile grizzlies are losing some of their major food sources - whitebark pine, cutthroat trout, army cutworm moths. This is forcing them to seek more protein (elk, deer, livestock), which humans also want, bringing the bears into more conflict with ranchers and hunters, and bringing the bears into forests and ranchlands (where there are more people) instead of staying in the high country. Not to mention that hundreds of bison are removed from the ecosystem nearly every year due to paranoia about brucellosis. How many grizzlies could those bison feed? Nor can grizzlies safely or effectively reach other populations of grizzlies to the north, meaning the Yellowstone grizzlies are totally isolated. Thus they cannot interbreed with other populations nor supplement their numbers from outside the ecosystem. One can hardly call this recovery. Instead we should be reintroducing grizzlies to the extensive public wildlands of Central Idaho. Delisting will mean turning management over to the states of Montana, Wyoming and Idaho, all of whom are drooling over the chance to hunt grizzlies. This makes me sick. So we spend all this time and effort to recover the grizzly, just so some rednecks can turn them into trophies? Is that the best we can do? I work as a guide and naturalist in Yellowstone Park. The biggest thing my guests want to see is bears and wolves, especially grizzly bears. People pay a lot of money to come here with the hope of seeing these animals. They get to enjoy	FWS-R6-ES-2016-0042-4434	
The additional threat of hunting may very well cause another population collapse.	Factor B	Delisting is premature. Grizzly populations face many uncertainties relating to food sources, climate change, and the like. The additional threat of hunting may very well cause another population collapse.	FWS-R6-ES-2016-0042-4559	

In the Yellowstone region, the growth of the population has stalled since the early 2000s, and there was a six percent decline last year. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population.	Factor B	See attached file(s) Attachments 160509_fws-r6-es-2016-0042-0001_keep_esa_protections_for_yellowstone_grizzlies	FWS-R6-ES-2016-0042-4459	
There is no reason to trophy hunt - it serves the interest of a tiny portion of the population who want to make rugs from these iconic species that are part of our American heritage .	Factor B	I am opposed to the delisting of grizzly bears. A few of the reasons but not even close to all of the reasons are as follows: **The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. **The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. **The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). There is no reason to trophy hunt - it serves the interest of a tiny portion of the population who want to make rugs from these iconic species that are part of our American heritage. **USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. **What's the Rush? There are too many unknowns right now, regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population. Why not wait five years to see how the population is responding to these threats?	FWS-R6-ES-2016-0042-4569	

Is species subject to overutilization for commercial, recreational, scientific, or educational purposes? (Hunting is, arguably, recreational utilization; so, yes.)	Factor B	Please don't remove this beautiful and iconic species from the list. Your criteria (http://nctc.fws.gov/pubs9/delisting.pdf): Is there a present or threatened destruction, modification, or curtailment of species' habitat or range? (In some cases, yes.) Is species subject to overutilization for commercial, recreational, scientific, or educational purposes? (Hunting is, arguably, recreational utilization; so, yes.) Is disease or predation a factor? (If hunting is counted as predation, yes.) Are there inadequate existing regulatory mechanisms in place outside the ESA (taking into account the efforts by the States and other organizations to protect the species or habitat)? (Perhaps. But we know how that goes. Look at Florida's massive bear hunt.) Are other natural or manmade factors affecting its continued existence? (Agriculture. Tourism. Hunting. Yes.) People already camp right at the park borders to snipe wolves as they cross the invisible boundary into unprotected space. We all know what's going to happen to the bears as soon as they lose their protected status. Every trophy hunter will be standing in line to take one down. California lost it's great bears and wolves years ago. It would be a tremendous shame to see it happen elsewhere. https://youtu.be/oZ7tSGxGue0	FWS-R6-ES-2016-0042-4583	
People already camp right at the park borders to snipe wolves as they cross the invisible boundary into unprotected space. We all know what's going to happen to the bears as soon as they lose their protected status. Every trophy hunter will be standing in line to take one down. California lost it's great bears and wolves years ago. It would be a tremendous shame to see it happen elsewhere.	Factor B	Please don't remove this beautiful and iconic species from the list. Your criteria (http://nctc.fws.gov/pubs9/delisting.pdf): Is there a present or threatened destruction, modification, or curtailment of species' habitat or range? (In some cases, yes.) Is species subject to overutilization for commercial, recreational, scientific, or educational purposes? (Hunting is, arguably, recreational utilization; so, yes.) Is disease or predation a factor? (If hunting is counted as predation, yes.) Are there inadequate existing regulatory mechanisms in place outside the ESA (taking into account the efforts by the States and other organizations to protect the species or habitat)? (Perhaps. But we know how that goes. Look at Florida's massive bear hunt.) Are other natural or manmade factors affecting its continued existence? (Agriculture. Tourism. Hunting. Yes.) People already camp right at the park borders to snipe wolves as they cross the invisible boundary into unprotected space. We all know what's going to happen to the bears as soon as they lose their protected status. Every trophy hunter will be standing in line to take one down. California lost it's great bears and wolves years ago. It would be a tremendous shame to see it happen elsewhere. https://youtu.be/oZ7tSGxGue0	FWS-R6-ES-2016-0042-4583	

In accordance to the population ecology background, density-dependent and density-independent factors can regulate a population size (42 USC 4321-4370 1969). Intraspecific killing has been occurring as a density-dependent factor within the population; two bears were killed by other bears in 2014 (IGBST 2014). There has been an increase in home range-size as the species population grows, bears have to travel further to obtain food. The research accomplished by the IGBST has easily made the GYE grizzly bear population the most studied North American species (IGBST 2014). Grizzly bears will continue to be monitored and managed but with more authority from State and Tribal agencies.	Factor B	The notion of delisting grizzly bears (<i>Ursus arctos horribilis</i>) from the Endangered Species List has been important to concerned Wyoming residents for quite some time now. I grew up in Cody, Wyoming where I have hunted, fished and travelled horseback through most of the Shoshone National Forest and Absaroka Wilderness. As a hunter and conservationist, I have personally witnessed part of the recovery of this species and believe that the population has recovered and this proposed rule should be made final. This docket was prepared in regards to the growing population of grizzly bears in the Greater Yellowstone Ecosystem (GYE). In compliance with the National Environmental Policy Act (NEPA), this statement is in the proposed rule for public comment (42 USC 4321-4370 1969). Livestock and human conflicts have been increasing every year (WGFD 2015). The planning within this document provides adequate data to prove that grizzlies have recovered and are at their carrying capacity for the Greater Yellowstone Ecosystem. With help from State and Tribal agencies and the Interagency Grizzly Bear Study Team (IGBST), the USFWS has shown that grizzlies can be delisted (42 USC 4321-4370 1969) and should be managed by State and Tribal governments. In accordance to the population ecology background, density-dependent and density-independent factors can regulate a population size (42 USC 4321-4370 1969). Intraspecific killing has been occurring as a density-dependent factor within the population; two bears were killed by other bears in 2014 (IGBST 2014). There has been an increase in home range-size as the species population grows, bears have to travel further to obtain food. The research accomplished by the IGBST has easily made the GYE grizzly bear population the most studied North American species (IGBST 2014). Grizzly bears will continue to be monitored and managed but with more authority from State and Tribal agencies. Concerns of Factor A The six recovery ecosystems of bear populations are an acceptable way to monitor the total population. However, with the movement of individual bears, it may be hard to identify total state populations at a given time (WGFD 2016). Yes, some of these bears are collared by state agencies but from experience, not every bear can and will be collared (Turnbull 2015). If the allowable number of total mortalities for independent females cannot exceed 7.6%, 15% for independent males and 7.6% for dependent young, each states harvest quota for mortality will have to continually change during the harvest season. Quotas should be established at the beginning of a hunting season and remain the same throughout the season based on previous estimated population size in each state. The Demographic Monitoring Area (DMA) includes Wyoming, Montana and Idaho and poses variability for harvest quotas. Concerns of Factor D During years of low productivity of high caloric foods for bears, bears will be more apt to	FWS-R6-ES-2016-0042-4361	
Not only does the delisting need to not put into effect, but a buffer zone around Yellow National Park needs to be put in place. Since bears do not mate every year, a hunt would quickly eliminate any surplus that cannot be readily replaced. To allow a hunt would decimate a animal that is sorely needed to maintain the balance in nature.	Factor B	In response to you wishing to delist the grizzly bear. In your own words, there are about 700 grizzlies in the area you wish to delist. Not only does the delisting need to not put into effect, but a buffer zone around Yellow National Park needs to be put in place. Since bears do not mate every year, a hunt would quickly eliminate any surplus that cannot be readily replaced. To allow a hunt would decimate a animal that is sorely needed to maintain the balance in nature.	FWS-R6-ES-2016-0042-4706	

Hunting and livestock allotments account for the overwhelming majority of all human-caused grizzly bear mortalities in the GYE. IGBST data indicate that out of 316 human-caused grizzly bear mortalities between 2000 and 2014, 150 (47%) were hunting-related, and 50 (16%) were livestock-related, collectively accounting for 63% of all human-caused grizzly bear mortality. IGBST data also show that of 206 known bear mortalities between 2009 and 2013, 146 were human-caused and of those, 58 (40%) were hunting-related. Hunting contributes to more documented mortalities than any other cause. By engaging in stealth behavior while hunting game in bear habitat, hunters kill, directly and indirectly, a substantial number of bears. Until wildlife managers eliminate hunter-caused bear deaths, hunting will remain an unaddressed excessively large, long-term, persistent, non-selective mortality sink for the GYE grizzly bear population. Adding trophy hunting as another contributor to bear mortality is unjustifiable on both scientific and ethical grounds. Trophy hunting is a major economic driver of the global market for animal body parts, contributing to extirpation of large-mammal populations in many areas of Africa and Asia, including Asian bear populations. Employing trophy hunting of grizzly bears in the GYE not only reduces an intelligent, behaviorally complex animal to a commodity, but also lends support to the economic objectification of rare animals that contributes to their extinction globally. Rather than be killed for trophies, bears in the GYE should be humanely euthanized and used to further our understanding of bear biology and not hung as trophies on the wall of elitist hunters. It is time to come to terms with the fact that hunting is a demographically withering pastime and hunters constitute a very small minority of the American public.	Factor B	See attached file(s) Attachments JSchmitt_Proposed Rule comments_2016	FWS-R6-ES-2016-0042-4727	
Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. - If hunting is allowed, there should be a 5-year moratorium on hunting until states can prove that they can manage the grizzly population effectively. - If hunting is allowed, there must be buffer zones around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park . -	Factor B	There are several reasons to not delist the Grizzly Bear: The proposed rule does not address genetic isolation of the bears. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - Declining food sources. Historically bears dependent on 4 food sources - 2 of which (whitebark pine and cutthroat trout) are disappearing and moths, their third main food source, are unreliable food source due to pesticides. - Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. - Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. - Grizzlies occupy only 1% of their historic range. - Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. - If hunting is allowed, there should be a 5-year moratorium on hunting until states can prove that they can manage the grizzly population effectively. - If hunting is allowed, there must be buffer zones around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park. - DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states known for their hatred and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and most Americans (55%) oppose delisting. Even more Americans (68%) oppose hunting of grizzly bears if delisted. - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted	FWS-R6-ES-2016-0042-4679	

Another item of deep concern is the inconsistent portrayal of the exact mortality thresholds if and when the population dips below 674 individual bears. According to Table 1 of the Proposed Rule (p. 13188), the mortality threshold for independent females and dependent young would be less than or equal to 7.6%. However, appended to this same Table is a footnote referencing Dan Ashe's (Director, U.S. Fish and Wildlife Service) letter to the State Directors that clearly states that the mortality threshold would be less than 7.6% (NOT less than or equal to 7.6%). This statement by Dan Ashe is contradicted by Table 1. To remedy this contradiction, perhaps the column for less than or equal to 674 bears should be restructured as two columns: 1) one with a mortality threshold of 7.6% when the population reaches exactly 674, and 2) a second column specifying a threshold of less than 7.6% when the population estimate is below 674 bears. This is a subtle but potentially significant disparity. As they say, the devil is in the details. As someone who has taught courses on extinction processes, I understand that a population at carrying capacity becomes intrinsically less stable. The stated goal of managing the bear population at 674 is based on the population estimate corresponding to carrying capacity; and hence, the thresholds at and below this point need to be clearly spelled out in both the Proposed Rule and Chapter 2 of the Conservation Strategy. As currently presented in Table 1 of the Proposed Rule and Table 2 of the Conservation Strategy (p. 36), the less than or equal to 7.6% value for mortality threshold of independent females and dependent young provides the opportunity for State managers to drive the population well below the stated goal of 674 bears by maintaining a fixed 7.6% mortality threshold independent of declining population size.	Factor B	See attached file(s) Attachments JSchmitt_Proposed Rule comments_2016	FWS-R6-ES-2016-0042-4727	
Grizzlies reproduce slowly. Cubs are with their mothers for three years. Although the state plans will no doubt take this into account, there has not been any serious attempt at penalizing poor judgement or vision on the part of hunters. As we have seen with wolves we have a "Oh golly gee I thought it was a coyote" attitude and NO penalties. Grizzlies cannot withstand that kind of assault.	Factor B	If you're going to delist Grizzlies, it should be based on sound science. It is not. USFWS claims there are 700 bears in the Greater Yellowstone ecosystem, but that's a guess that is challenged by researchers that have worked with them for 20 years. There are several factors that are threatening the survival of grizzlies - among them the loss of the cutthroat trout and the whitebark pine beetle. If these critically important food sources collapse, the grizzlies will be in trouble. Grizzlies reproduce slowly. Cubs are with their mothers for three years. Although the state plans will no doubt take this into account, there has not been any serious attempt at penalizing poor judgement or vision on the part of hunters. As we have seen with wolves we have a "Oh golly gee I thought it was a coyote" attitude and NO penalties. Grizzlies cannot withstand that kind of assault.	FWS-R6-ES-2016-0042-4776	

The hunting of Grizzly bears will become rapidly popular and the population will not be able to keep up with demand from the hunting season. The number of deaths will be greater than births.	Factor B	It is not in the best interest of the grizzly bear to be taken off the endangered species list for many reasons. 1) The population is not spread out far enough to ensure a healthy gene pool for future generations 2) The population has grown but not to a substantial amount 2.1) The hunting of Grizzly bears will become rapidly popular and the population will not be able to keep up with demand from the hunting season. The number of deaths will be greater than births. 2.2) As a result of a population not being able to keep up the bears will shortly be put back into a dangerous number 3) Once you've opened the Grizzly Bear to hunting, eventually if the time comes to revoke that decision, the amount of poachers will be greater than it is today.	FWS-R6-ES-2016-0042-4865	
Despite the claims from trophy hunters and other groups that the bear population needs to be cut due to increased interaction with humans, etc, there are better ways of handling population control.	Factor B	Please do not take the yellowstone grizzly off of the endangered species list. Despite the claims from trophy hunters and other groups that the bear population needs to be cut due to increased interaction with humans, etc, there are better ways of handling population control. Furthermore, the increase in population is still unstable, and far more data is needed before bear stability can be proven to the point of de-listing. These bears are one of the primary reasons folks still protect and care for Yellowstone national park. And places like Yellowstone are some of the few remaining places for these magnificent creatures. Please do not compromise the safety of the bear populations by de-listing them.	FWS-R6-ES-2016-0042-4881	

the hunt of these majestic creatures is not worth it's faults. Not having the ability to decipher the difference between a female and male bear should be a huge deterrence. Having the legal ability to kill either gender would cause a major lose in population. Cubs stay with their mother's for quite some time and by killing a female you might miss that she has cubs, whom will not survive without her, or that she may be pregnant.	Factor B	If by removing Grizzly Bears from the Endangered and Threatened Wildlife list entails a new founded hunting season or trophy hunt, I would hope you would reconsider. For numerous reasons, the hunt of these majestic creatures is not worth it's faults. Not having the ability to decipher the difference between a female and male bear should be a huge deterrence. Having the legal ability to kill either gender would cause a major lose in population. Cubs stay with their mother's for quite some time and by killing a female you might miss that she has cubs, whom will not survive without her, or that she may be pregnant. Not only would a Grizzly season be dangerous to the bears, but also to people. By actively seeking these animals in their homes, humans are more likely to be attacked by a bear that is protecting it's territory, it's cubs, or it's self. This is also a cause for concern in that these grizzlies may become extremely fearful of people. In situations where a human is just within site range, the bears will be easily agitated and far more likely to attack rather than to run away because of this increased fear. Which, in turn, will cause far more human injuries and deaths by Grizzly bears.	FWS-R6-ES-2016-0042-4920	
Given recent decreases in their food sources, and more bears wandering further in search of sustenance, I can anticipate that many of the bears in the Yellowstone system will wander at times outside of the park's boundaries. I have concern that any sport hunting which might be allowed by states after delisting (and which are already rumored to be in the works) would not only threaten the grizzly population, but could also increase the potential for conflict/threat between grizzlies and non-consumptive wildlife users, such as hikers/backpackers. If a bear were to survive or witness an encounter with a sport hunter, I worry that that bear would be more prone to perceive other humans as a threat, and therefore put people at greater risk as well.	Factor B	I am writing to respectfully share my opposition to the proposal to delist grizzlies in the Greater Yellowstone Ecosystem. I submit my comments as someone who takes an annual back country trip to another grizzly habitat, Glacier National Park in Montana, and who over the years has developed a deep appreciation for grizzlies. I also have a deep appreciation for the fact that, while generally calm, when feeling that they/their young may be threatened, they can pose a life threatening danger to hikers/backpackers or others. Given recent decreases in their food sources, and more bears wandering further in search of sustenance, I can anticipate that many of the bears in the Yellowstone system will wander at times outside of the park's boundaries. I have concern that any sport hunting which might be allowed by states after delisting (and which are already rumored to be in the works) would not only threaten the grizzly population, but could also increase the potential for conflict/threat between grizzlies and non-consumptive wildlife users, such as hikers/backpackers. If a bear were to survive or witness an encounter with a sport hunter, I worry that that bear would be more prone to perceive other humans as a threat, and therefore put people at greater risk as well. I am also concerned given how slowly grizzly bears reproduce, and the inexact science with regards to counting their population. Last year in Florida's first black bear hunt, quotas were exceeded over the first weekend of the hunt. If quotas for a grizzly hunt were accidentally exceeded, the time to rebuild the population could be significant. And from my observation with the limited sport hunting allowed of wolves, both here in my home state of Minnesota, and out west, once sport hunting starts, the appetite for it increases- regardless of if animal population numbers "support" continued hunts or not. If the FWS allows for the hunting of grizzlies, I think we need to be prepared for there to be more pressure for grizzlies to be hunted, whether or not the science would support that as a possible alternative at any given time. I also want to note the recent meta-analysis of the impact of hunting keystone predators upon their ability to best perform their vital ecological functioning, and that the environmental detriment is not simply a function of the number of animals left on the landscape, but also of the ways their behaviors are influenced by being subject to hunts (Ripple, et.al., Bioscience, 2009). In closing, I would like to add one additional matter. The USFWS says that it wants to work with Native American groups on this proposal. Over fifty native american groups have already shared that they are opposed to this delisting. Please listen to the voices of Native Americans, myriad scientists, and many many other Americans, and do not move forward with the delisting of grizzlies at this time. Thank you for your time and attention.	FWS-R6-ES-2016-0042-4930	

Additionally, the Grizzly population is likely to suffer severe reductions in their population if the proposed removal from the Federal List of Endangered and Threatened Wildlife is approved due to trophy hunts in Wyoming, Montana, and Idaho. I understand from available information that these trophy hunts are likely to begin within one year of "removal". If sport hunting and other causes of mortality exceed the number of cubs born each year, the Grizzly's numbers could be reduced within a very short amount of time.	Factor B	I am very concerned about the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. According to Mr. Doug Peacock, an expert on the Greater Yellowstone Grizzly Bears, evidence indicates that the Grizzly population is already being impacted by climate change in so much as reducing one of its major food sources, e.g. the Whitebark Pine tree to near extinction in the last 10 years. It remains to be seen the overall effect, but at one time, the nuts from the Whitebark Pine, a species of pine that grew abundantly at higher elevations, provided an especially valuable food source for mother bears with the added advantage that vulnerable mother bears and their young tended to stay at these higher, more remote and therefore safer locations, where the trees grew. Due to the near extinction of the Whitebark Pine, the safety that accompanied this food source no longer exists. Additionally, the Grizzly population is likely to suffer severe reductions in their population if the proposed removal from the Federal List of Endangered and Threatened Wildlife is approved due to trophy hunts in Wyoming, Montana, and Idaho. I understand from available information that these trophy hunts are likely to begin within one year of "removal". If sport hunting and other causes of mortality exceed the number of cubs born each year, the Grizzly's numbers could be reduced within a very short amount of time. I believe strongly in the protection afforded the Greater Yellowstone Grizzly Bears under the Endangered Species Act as the best means to ensure that this population of bears will continue to roam the forests and mountains of the Greater Yellowstone Ecosystem for years to come. I respectfully request that FWS halt the process of removal and begin a thorough study of the effects of climate change on the Grizzly Bear in the present as well as in the future prior to making its decision.	FWS-R6-ES-2016-0042-5486	
Unfortunately, after delisting, the likely legal hunting of grizzly bears in the states of ID, MT, and WY, would NOT be responsible or reasonable for the GYE grizzly bear population to continue to be healthy and viable. Also, unfortunately, the illegal killing of grizzly bears would significantly rise, especially with little or no funding, efforts or motivation to prosecute violations of important wildlife regulations. I am absolutely against any legal hunting of grizzly bears in the lower 48 contiguous United States for many responsible reasons, and especially for the hunting of grizzly bears would definitely be damaging to grizzly bear conservation and the GYE grizzly bear population would be significantly reduced. Any consideration or allowance of legal grizzly bear hunting in any state at anytime in the future must absolutely be denied before proposal is reasonable, responsible, or expectable.	Factor B	As a wildlife biologist, I have worked with several USFWS Threatened and Endangered Species over the past 30 years, with several federal land management agencies. I absolutely disagree with the USFWS's totally premature and significantly and inadequately designed and planned proposal to delist the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Threatened Species Protections of the Endangered Species Act which the grizzly bears have been under for the last 40 years for these several important reasons. 1. While the numbers of grizzly bears in GYE are up since the low in the late 1970s and early 1980s, this has taken more than three decades of significant and serious legally established protections and considerable conservation efforts on many different levels. The delisting of GYE grizzly bears now, during increasing Climate Change uncertainty and scientifically accepted understanding of changing or reduced grizzly bear habitats including food, water and shelter resources would absolutely reduce the GYE grizzly bear population (likely other lower 48 grizzly bears and their populations too), and their conservation efforts and funding, which would definitely and significantly compromise the viability of these GYE grizzly bears in both the short-term, and the long-term for America's Future generations. All the important and comprehensive grizzly bear conservation measures must be established and in place before delisting proposal is considered, including all the funding, ecological, scientific, social, and economic issues and concerns. Unfortunately, none of these important conservation measures, issues, and concerns are adequately addressed yet, so this grizzly delisting proposal must not continue. 2. Unfortunately, after delisting, the likely legal hunting of grizzly bears in the states of ID, MT, and WY, would NOT be responsible or reasonable for the GYE grizzly bear population to continue to be healthy and viable. Also, unfortunately, the illegal killing of grizzly bears would significantly rise, especially with little or no funding, efforts or motivation to prosecute violations of important wildlife regulations. I am absolutely against any legal hunting of grizzly bears in the lower 48 contiguous United States for many responsible reasons, and especially for the hunting of grizzly bears would definitely be damaging to grizzly bear conservation and the GYE grizzly bear population would be significantly reduced. Any consideration or allowance of legal grizzly bear hunting in any state at anytime in the future must absolutely be denied before proposal is reasonable, responsible, or expectable. 3. Absolutely, important comprehensive Grizzly Bear Habitats on federal, state and local lands in all the appropriate NW States must be established and well coordinated first, before any delisting proposal should be considered. Seriously, grizzly bear habitats and their continued management, preservation and conservation for grizzly bears in the states of ID, MT, and WY on federally managed public	FWS-R6-ES-2016-0042-5460	

Uncertainties about bear demographics and increasing human activity (including hunting) require a more conservative approach than outlined in the PRD. Established recovery strategies and criteria should be retained or even strengthened, with continuing effort to reduce human activity that either damages habitat or invites the greatest risk of human-bear conflict which leads to bear mortality. The PRD does not demonstrate adequately that the scientific modeling or the underlying assumptions to population statistics are robust and will result in appropriate management measures to ensure the success of the GYE grizzly population. I am distressed that FWS expresses confidence in predicting how many "extra" female and male bears that each year will be available for trophy hunting. Some of these annual predictions are very low numbers (less than 5). It is unfathomable that a natural resource agency would ever declare any number of bears less than 5 as "extra" and appropriate for trophy hunting. Given the uncertainty, there should be no "discretionary" bear mortality within the PCA.	Factor B	Cynthia Guerra, May 2016 Comments regarding FWS Docket ID: FWS-R6-ES-2016-0042: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. It has been suggested that current management actions have led to an increase in numbers of grizzly bears in the Greater Yellowstone Ecosystem (GYE). But the published Proposed Rule Document (PRD) and supporting reports state that grizzly bears remain "a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality." Therefore, continuation of current management practices is required to help assure a healthy population of the species in the future. It is stated that bear numbers have increased in the core recovery area, but the underlying assumptions to these statements may be inherently flawed rendering these numbers inaccurate. If the assumptions in the PRD and supporting reports do not hold true in the future, grizzly populations may be adversely impacted. The prudent approach now is to maintain their current listing status. Therefore, I oppose delisting of GYE grizzly bears under management conditions as described in the current FWS PRD and Conservation Strategy. Uncertainties about bear demographics and increasing human activity (including hunting) require a more conservative approach than outlined in the PRD. Established recovery strategies and criteria should be retained or even strengthened, with continuing effort to reduce human activity that either damages habitat or invites the greatest risk of human-bear conflict which leads to bear mortality. The PRD does not demonstrate adequately that the scientific modeling or the underlying assumptions to population statistics are robust and will result in appropriate management measures to ensure the success of the GYE grizzly population. I am distressed that FWS expresses confidence in predicting how many "extra" female and male bears that each year will be available for trophy hunting. Some of these annual predictions are very low numbers (less than 5). It is unfathomable that a natural resource agency would ever declare any number of bears less than 5 as "extra" and appropriate for trophy hunting. Given the uncertainty, there should be no "discretionary" bear mortality within the PCA. Current efforts to recover the population of the GYE bears need to continue. Maintenance or even growth of that population should be the primary goal. Grizzly bear populations are an important part of our nation's shared natural heritage. I urge you to reject delisting.	FWS-R6-ES-2016-0042-5529	
Yellowstone grizzlies will be lost from the Demographic Monitoring Area (DMA) by only two processes, mortality and emigration. But, the Proposed Rule does not consider emigration. Not considering emigration will reduce Rule effectiveness, in part through inaccuracies in underestimating background losses of DMA grizzlies. Before deciding on delisting, please remedy this science shortcoming with analyses using the immense amount of grizzly bear tracking data available from USGS. See supportive details in my comment posted on May 2, 2016.	Factor B	Yellowstone grizzlies will be lost from the Demographic Monitoring Area (DMA) by only two processes, mortality and emigration. But, the Proposed Rule does not consider emigration. Not considering emigration will reduce Rule effectiveness, in part through inaccuracies in underestimating background losses of DMA grizzlies. Before deciding on delisting, please remedy this science shortcoming with analyses using the immense amount of grizzly bear tracking data available from USGS. See supportive details in my comment posted on May 2, 2016.	FWS-R6-ES-2016-0042-5568	

For me the most distressing fact is that the surrounding a states are so eager to hold trophy hunting seasons...even when 60-90 bears died due to human causes last year. That may be as much as 10% of the population. Adding a trophy hunt on top of that would be unsustainable. I for one believe that some animals should be managed and protected for their own intrinsic worth...not merely to serve as a cash-generating trophy.	Factor B	I am writing to urge you to not remove Yellowstone's grizzly bears from the Endangered Species List. I live, recreate and work in the Greater Yellowstone Ecosystem...or in other words grizzly country. My daily experiences support the fact that the grizzly population has indeed greatly increased. But these experiences also highlight the fact that the grizzly faces an uncertain and precarious future. Many of their prime food sources are facing serious threats from climate change, other predators, loss of wilderness and encroachment by human development. And as the numbers of people surrounding and visiting a Yellowstone and Grand Teton National Parks swell, more and more encounters result in more and more dead beats. For me the most distressing fact is that the surrounding a states are so eager to hold trophy hunting seasons...even when 60-90 bears died due to human causes last year. That may be as much as 10% of the population. Adding a trophy hunt on top of that would be unsustainable. I for one believe that some animals should be managed and protected for their own intrinsic worth...not merely to serve as a cash-generating trophy. However this non-hunting-centric view of conservation and wildlife management holds little to no sway with the states who you would entrust with the bears' future. Their philosophy, funding and worldview is driven by a small section of the nation...hunters. And this means they view the bears' very existence as based in serving as game. Chris Servheen is right that the recovery of the grizzly is a tremendous success. But let's not hand that success off until its future is known to be secure. Let's not hand that future over to the states until their wildlife departments move away from a foundation built upon harvesting our wildlife to one more in line with what the federal government has relied on to protect Grizzlies for the past four decades. Let's not gamble on the bears' future until we know how they will respond to a changing landscape, until we can support increased awareness about living with bears and until we can ensure that humanity doesn't ultimately crush the wild out of this precious ecosystem. Please continue to protect the the grizzly,!	FWS-R6-ES-2016-0042-5570	
Ethical hunting is for putting food on the table. You don't eat carnivores. Trophy hunting will prevail, attracting the worst common denominator among hunters, polluting and devaluing the conservative western tradition of eating what you kill. Hunting bears in the fall as they prepare to hibernate will disrupt their energy gathering efforts. Hunting also can indirectly affect age and sex structure and the social organization of a population of bears.	Factor B	Do not remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. They are not fully recovered. They remain an isolated population vulnerable to genetic inbreeding. Not enough has been done to connect and protect habitat. Their population in the American West is a small fraction compared to what it was before European colonization. Historical food sources such as white bark pine and cut-throat trout are failing. We are unsure what other impacts climate change and human population pressure (human caused mortality is the single largest contributor to grizzly bear deaths) will make on grizzly bear food sources and habitat security. In light of that uncertainty we must proceed with caution. The state of Montana should not be entrusted with the management of grizzly bears recovered from the brink of extinction in the lower 48 states using federal tax dollars. Grizzly bears are a federal treasure and should not be subject to Montana hunting under the aegis of an agency funded largely by licenses to kill wildlife they are "managing". Once delisted there will be a gleeful shooting gallery effect much like what the wolf is currently facing. Ethical hunting is for putting food on the table. You don't eat carnivores. Trophy hunting will prevail, attracting the worst common denominator among hunters, polluting and devaluing the conservative western tradition of eating what you kill. Hunting bears in the fall as they prepare to hibernate will disrupt their energy gathering efforts. Hunting also can indirectly affect age and sex structure and the social organization of a population of bears. Grizzly bears are our neighbors. They share the planet with us. They deserve to exist unrelated to human comfort and convenience. They have intrinsic value simply because they are. A community is a place and all its creatures, including grizzly bears. Grizzly bears are an important "umbrella" species. As the grizzly bear goes so goes the rest of the biodiversity of an ecosystem. It's all connected.	FWS-R6-ES-2016-0042-5578	

Also of concern are the proposed trophy hunts in Wyoming, Montana, and Idaho that are likely to begin within a year of delisting. If sport hunting and other causes of mortality begin to exceed the number of cubs born in a year, the grizzly's numbers could begin to decrease within a very short time.	Factor B	I am very concerned about the proposed delisting of the Yellowstone grizzly bear. Evidence indicates that the grizzly is already being impacted by climate change with the near extinction of the whitebark pine in the last ten years due to warming temperatures. From what I have read, nuts from the whitebark pine provided an especially valuable food source for mother bears with the added advantage that those vulnerable bears and their young tended to stay at higher, more remote (safer) locations, where the trees grew. Also of concern are the proposed trophy hunts in Wyoming, Montana, and Idaho that are likely to begin within a year of delisting. If sport hunting and other causes of mortality begin to exceed the number of cubs born in a year, the grizzly's numbers could begin to decrease within a very short time. I believe that protection under the Endangered Species Act is the best hope we have to ensure that these great bears will continue to roam the forests and mountains of the Greater Yellowstone Ecosystem for years to come. I ask that FWS halt the delisting and take a closer look at how climate change is impacting the grizzly today and how it is likely to impact them in the future before making any final decision. Thank you for your consideration.	FWS-R6-ES-2016-0042-5605	
If Grizzly Bears were to be removed from the Endangered and Threatened species list - not just the few that would be legally hunted would perish each year on lands surrounding Yellowstone. It would become more easy to fragment the habitat through mining, timber sales, recreation, etc if the land was not inhabited by a species of concern. Humans could "accidentally" shoot a Grizzly bear and call it self defense, without the ramifications of being persecuted which would happen if you shot and killed a species of concern. Humans could be more carefree about shooting guns towards a bear, rather than using pepper spray, which could lead to an increase with injured bears that could become more dangerous to another human that it might encounter next.	Factor B	I am an authorized and licensed guide working inside Yellowstone National Park. I am a resident of Gardiner, Montana which is a gateway community to Yellowstone's Northern Border. As the owner of my guiding service, my income and livelihood rely on the fact that people want to visit the natural beauty that is found inside our world's first national park. Yellowstone is a one-of-a-kind place where wildness still exists in the Lower 48. Bound by public lands and no serious development, allows the wildness to thrive. Without the existing USFS lands (forest and designated wilderness) that surround the park, Yellowstone National Park would not have the diversity within its biological communities that it has today. Gardiner sits in a small valley that is surrounded by public lands. I grew up in the west gaining a respect for the open spaces that I had around me and I am now able to instill that similar respect to my 4 year old daughter today, because of the wildness that surrounds us. We can walk up the hill behind our house and easily find tracks of grizzly and black bears, wolves, coyote, cougar, elk, bison, mule and whitetail deer and the occasional moose. We have all the amazing diversity of creatures, literally out our back door and my daughter can experience this wildness and be in touch with it. In today's society - that is a honest to goodness VERY special thing! If Grizzly Bears were to be removed from the Endangered and Threatened species list - not just the few that would be legally hunted would perish each year on lands surrounding Yellowstone. It would become more easy to fragment the habitat through mining, timber sales, recreation, etc if the land was not inhabited by a species of concern. Humans could "accidentally" shoot a Grizzly bear and call it self defense, without the ramifications of being persecuted which would happen if you shot and killed a species of concern. Humans could be more carefree about shooting guns towards a bear, rather than using pepper spray, which could lead to an increase with injured bears that could become more dangerous to another human that it might encounter next. With today's global changes - drier climate means less available overall forage (not just Whitemark pine nuts) for the Grizzly Bear. This in turn will lead to more seasonal human/bear conflict and more removal of bears from the Greater Yellowstone Ecosystem. All of these reasons stated - leads to the simple fact that Grizzly Bears can not rebound once their habitat is fragmented, human conflict increases and food sources overall, are changing. Even though reaching a larger population of bears in the ecosystem is a sign of success and cause for delisting, we must look at the bigger picture and understand that Grizzly Bears are a scientifically proven species that has a low mortality rate and negatively affected by changes in its habitat. This very serious decision of delisting is coincided with the fact that we are reviewing opening sections of the Gallatin Mountains	FWS-R6-ES-2016-0042-5606	

Nothing appears to me more ill conceived that this de-listing which would put a blanket of death over the bear. It would make more sense to allow a hunt or two in particular areas that could be well-studied to evaluate the consequences. When other species have been delisted - to the exception of the wolf, another sad case - the protected species have been allowed to flourish and benefit from the protections long term. Only if and when we would have enough grizzly bears that would exceed the carrying capacity of certain areas would partial de-listing make sense. Large predators like the grizzly make good sense for ecosystems. Science is clear about this. And large predators like the grizzly prevent other damages to vegetation and ecosystems by keeping tabs on other species.	Factor B	As a botanist and a long time observer of healthy ecosystems I would like to comment against the de-listing of the grizzly bear. Main concerns of mine are, first of all, the hunting spree that this de-listing will unleash. The bear is already under severe threats because of the dwindling food resources, and reduced habitat. Increased logging, vegetation clearing, new and out of control insect pests associated with climate change and climate change itself have already placed it under fire. We should be working desperately to hang on to these iconic species that, were they to disappear would leave us incredibly diminished and not planning their demise. Another huge concern is the invasion of wilderness lands by hunters set on finding these bears. Very little much is known about the genetics or reduced fitness since listing. Little is known about the necessary density for successful long term recovery. Nothing appears to me more ill conceived that this de-listing which would put a blanket of death over the bear. It would make more sense to allow a hunt or two in particular areas that could be well-studied to evaluate the consequences. When other species have been delisted - to the exception of the wolf, another sad case - the protected species have been allowed to flourish and benefit from the protections long term. Only if and when we would have enough grizzly bears that would exceed the carrying capacity of certain areas would partial de-listing make sense. Large predators like the grizzly make good sense for ecosystems. Science is clear about this. And large predators like the grizzly prevent other damages to vegetation and ecosystems by keeping tabs on other species. I urge you not to allow the de-listing. We need our top beautiful grizzly bear to continue to recover protected by the ESA. Thank you very much for allowing me to comment.	FWS-R6-ES-2016-0042-5637	
State wildlife management agencies bend over backwards for "sport" hunters interested in killing wildlife, who view carnivores as competitors. Hunting accounts for 70-80% of all deaths of adult carnivores in the West. The public trust doctrine is often invoked by state wildlife agencies, but much abused in actual practice in a system that marginalizes and excludes stakeholders who value large carnivores intrinsically or for contributions to ecosystem health. Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals.	Factor B	I submit comments as a biologist and wildlife conservationist. Given the severity of threats facing Yellowstone's grizzly bears, I strongly urge you to NOT delist the population, renew sport hunting, and/or lessen habitat protections. The reasons to not delist follow. - Yellowstone's grizzly bear population is NOT recovered: It is completely isolated from other grizzly bear populations and very far from the 2000+ animals considered necessary for long-term viability; it's also only 2% of the 100,000 grizzly bears that once roamed the U.S. (in a range 100 times larger!). This magnificent animal's imperilment comes from too many people collectively causing permanent habitat degradation and fragmentation (such as increasing human infrastructure, energy development, problematic livestock husbandry practices, climate change, poor state management, persecution, and questionable methods of monitoring the grizzly's status). - Yellowstone's grizzly bears have lost critically important forage that previously had positive effects on their reproductive success. Since the early 2000s much of their food resources are depleted due to recently introduced non-native lake trout, a white pine fungal disease, a climate-driven outbreak of bark beetles, and a loss of army cutworm moth that are severely threatened by warming. There is no doubt that food resources of Yellowstone's grizzly bears have declined and put the population at grave risk, and more is on its way. - Grizzly bears have one of the lowest reproductive rates of any land mammal, and most cubs die before adulthood. The species also has difficulty colonizing new habitats, mainly because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates and can more easily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover! - State wildlife management agencies bend over backwards for "sport" hunters interested in killing wildlife, who view carnivores as competitors. Hunting accounts for 70-80% of all deaths of adult carnivores in the West. The public trust doctrine is often invoked by state wildlife agencies, but much abused in actual practice in a system that marginalizes and excludes stakeholders who value large carnivores intrinsically or for contributions to ecosystem health. Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals. - Counting grizzlies in Yellowstone's wilderness is difficult, and the indirect indicators used by USFWS are unreliable and generate false results that increase the likelihood that the USFWS will inaccurately conclude that the population has grown when in	FWS-R6-ES-2016-0042-5647	

These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country.	Factor B	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	
When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting: just like FWS is allowing to happen with wolves. The writing is on the wall. Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. This approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. The three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. Summary: The numbers of bears are not viable within GYE, GYE is an island for genetic diversity, the 3 states have horrible management of predators (has seen with wolves). I am AGAINST the delisting of the grizzly bear .	Factor B	Thank you for allowing public comment on this Proposed issue: The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Plus, the GYE is an isolated "island" where species diversity is limited because corridor for new genetic are shut down because of human inter mention (i.e. road, ranches, etc) GYE region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. FWS will stay involved with protecting the grizzly population after delisting. In the form of a leaked memo, the 3 states said that they will open up trophy hunting seasons for the bears. I believe that opening such seasons is a prime motivation for the states in pushing for de-listing. If you look at what each state is doing to manage wolves, it is clear that they will only allow the minimum numbers of individuals to survive, nothing more. Relying on state agencies, that have shown a deep hatred towards any predator shall NOT be allowed or given a chance to manage a endangered species. FWS claim that they will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future, "...the grizzly	FWS-R6-ES-2016-0042-1922	

Trigger Text						Code(s)	Full Comment Text	Form Letter/Document ID	Annotation Notes
Human-caused mortality of grizzly bears has been on the rise	802					Factor C	First, I am Wildlife Biologist, former state (Maine and Everglades) and federal. The following is written by Center for Biological Diversity. I have read it and agree wholeheartedly. I will go further by saying that the CBD has become the most effective wildlife conservation entity in America. You are the lead agency responsible for effecting the Endangered Species Act of 1973, and you will be held responsible. - - I know it is not easy and with the Republican interests attacking the ESA more aggressively than ever, it is becoming more difficult. But the right decisions must still be made, regardless of how difficult. - - Following the CBD's words. - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
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Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities.	802					Factor C	Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities. Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 -- and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears. - - The plan presents a potentially tremendous setback. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - - Yellowstone's bears have also long been isolated from other bear populations, forcing the government to keep them on permanent life support by proposing to truck in bears to avoid health issues caused by inbreeding. This fact further highlights the need for recovering grizzlies in more places. - - I am asking the Service to maintain protections for Yellowstone grizzly bears. If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
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Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result	802					Factor C	I am writing to urge you to maintain federal ESA listing for grizzly bears in the Greater Yellowstone Ecosystem (GYE) -- a high-profile population that we as a nation have invested in since 1975. The FWS estimates a GYE grizzly population of about 700 animals, but this is the census size (N). The science of conservation genetics (in which I have some expertise) tell us that the most important number is not N, but rather the "effective population size" (Ne) - basically the number of individuals that successfully reproduce each generation. Depending on the sex ratio and age structure of sexually mature individuals, the number of breeding adults will be LOWER to FAR LOWER than the census size, and in terms of genetic health and long-term viability of a population, THIS IS WHAT COUNTS. (We have learned this the hard way with the Florida Cougar!). Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. - - Despite positive demographic trends since ESA listing of the GYE grizzlies, this population remains severely isolated, which will jeopardize the long-term viability of this population until some connectivity can be established with other populations. Without some assurance that surrounding states can protect bears that attempt to disperse, should ESA restrictions be lifted, this listing should be maintained. Artificially moving GYE bears to other populations (Northern Rockies) and vice-versa may be necessary in the short term, but this amounts to "ecologically baby-sitting" and is not a long term strategy. Corridors must be developed and then maintained long enough to document successful dispersal and reproduction by bears into and out of the GYE, and then delisting would be justified. I hope you will reconsider the delisting proposal and keep the GYE bears protected until they can become part of a larger meta-population group. - - Sincerely,	CBD	
The bears are under pressure which several of their favorite food sources also being under pressure from climate change. In addition, some trees are dying from beetles that are expanding their range also due to climate change. As a result, a two-step food challenge is under way that will impact how much fat the bears can put on prior to hibernation. All these 'drops in a bucket' still threaten to add up to trouble for bears already suffering from habitat loss, human competition, roads, cars and trucks and from intentionally being shot if they wander out of the park in search of food	802					Factor C	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - The bears are under pressure which several of their favorite food sources also being under pressure from climate change. In addition, some trees are dying from beetles that are expanding their range also due to climate change. As a result, a two-step food challenge is under way that will impact how much fat the bears can put on prior to hibernation. All these 'drops in a bucket' still threaten to add up to trouble for bears already suffering from habitat loss, human competition, roads, cars and trucks and from intentionally being shot if they wander out of the park in search of food. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
Aren't humans amazing? They kill wildlife -- birds, deer, all kinds of cats, coyotes, beavers, groundhogs, mice and foxes by the million in order to protect their domestic animals and their feed.	802					Factor C	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing. Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope--they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in West--they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Aren't humans amazing? They kill wildlife -- birds, deer, all kinds of cats, coyotes, beavers, groundhogs, mice and foxes by the million in order to protect their domestic animals and their feed. Then they kill domestic animals by the billion and eat them. This in turn kills people by the million, because eating all those animals leads to degenerative -- and fatal -- health conditions like heart disease, stroke, kidney disease, and cancer. So then humans spend billions of dollars torturing and killing millions more animals to look for cures for these diseases. Elsewhere, millions of other human beings are being killed by hunger and malnutrition because food they could eat is being used to fatten domestic animals. Meanwhile, few people recognize the absurdity of humans, who kill so easily and violently, and	Endangered Species Coalition	

Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem.	805	806				Factor C	The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope&ldquo they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Thank you. Sincerely,	Endangered Species Coalition	
Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. This should be standard policy in national parks and forests.	805	806				Factor C	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been an amazing Endangered Species Act success story. However, after reading it today, I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope. They should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears therein. Secondly, please create a delay in the onset of any grizzly bear hunting for several years, post-delisting, to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Especially there, we should definitely treat them as our neighbors, not merely as game animals. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. This should be standard policy in national parks and forests. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in West. I know they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	
GRIZZLY BEARS ARE AN INTEGRAL PART IN ECOSYSTEMS. THEY ARE INTELLIGENT ANIMALS, WHO, WHEN GIVEN THE CHANCE, PREFER TO BE AWAY FROM HUMANS. WE MUST LEARN TO LIVE NEXT TO THEM, AND NOT HUNT THEM AT ALL .						Factor C	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. GRIZZLY BEARS ARE AN INTEGRAL PART IN ECOSYSTEMS. THEY ARE INTELLIGENT ANIMALS, WHO, WHEN GIVEN THE CHANCE, PREFER TO BE AWAY FROM HUMANS. WE MUST LEARN TO LIVE NEXT TO THEM, AND NOT HUNT THEM AT ALL. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. Create connections between bears, and coordinate	GYC	

Maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans	802					Factor C	Please accept my comments on the proposed delisting rule. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. The country's grizzly bears are almost all habituated to humans, with most willing to co-exist and not harm us. They normally do not see people as food or as harmful. Hunting them is taking unfair advantage and needlessly killing creatures that we can live in harmony with. When a bear becomes a danger to people or animals, then it can be removed from the population. Include a campaign to change people's attitudes first. Protect core habitat. There needs to be a corridor from Yellowstone to the Yukon (the Y to Y project). Please support that so that the grizzly population can become self sustaining, with or without people, with or without special protections, as part of a natural ecosystem. They need to be able to travel to find food and other non-related bears. - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. -Maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. Maintaining a stable population will depend on the grizzly's food supply in a human-free habitat, which is in great fluctuation now. Commit to reducing conflicts. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. A campaign and bear-proof garbage containers to start. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other agencies involved. Many volunteers and local groups are ready, willing, and able to help. Please change the proposed plan for the better. Show that we have learned how to manage wildlife better over the past 100 years, when we didn't do so well. Take the words 'extermination', 'killies', 'removal'	GVC	
2) Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen.	802					Factor C	It is obvious that the grizzly bear delisting proposal is totally unscientific! It is done in a sloppy way, and is far too important to go forward when basic data is not available or not in relevant form. 1) state grizzly bear management plans need to be updated. 2) National forests need to amend their plans to protect the places where bears live. 3) Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Also, delisting means that grizzlies will be hunted and wiped out in Idaho, Montana, and Wyoming. That is completely counter to what we, the American Public want on the public lands we own. We completely oppose grizzly bear hunting - the bears are majestic, awe-inspiring symbols of the wild, not trophies. And from a tourism perspective, bears are worth more alive than dead. Taken together, the states' Bear Management Plans are not coordinated and not updated. 1) Wyoming's Plan violates federal law in proposing to assume authority on private land in-holdings within park boundaries. 2) Montana's plan doesn't commit to allowing separate bear populations to connect with each other. 3) Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Where is the funding for all this? State bear management plans for maintaining a healthy grizzly bear population need to show how the updated plans will be paid for!! To summarize the important points -- 1) Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. 2) Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. 3) Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest	GVC	

We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen.	805					Factor C	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribes,	GVC	
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There are laws in place to handle bears that interfere with ranchers. There is no need, nor are there enough bears, to permit the lifting of their protection.						Factor C	I care! There are laws in place to handle bears that interfere with ranchers. There is no need, nor are there enough bears, to permit the lifting of their protection. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	

People and bears can coexist. We should not let bears slide back towards extinction because of misplaced political hostility towards these magnificent and beloved creatures. The end result of this proposal will be fewer bears limited to less land and with access to fewer resources necessary for survival.						Factor C	I am writing to urge you to postpone delisting of the Yellowstone grizzly bear population. The proposal to remove Yellowstone grizzly bears from the endangered species list fails to preserve the progress made toward bear recovery. In fact, it will reverse it. The Greater Yellowstone grizzly bear is one of the United States' most iconic species. Held sacred by native communities for thousands of years in the west, the majestic grizzly has become a treasured symbol of our wild heritage. Visitors spend millions of dollars in the region every year, a vital part of many local economies, in the hopes of spotting a magnificent grizzly. The loss of the grizzly would be a loss for the entire region, and a disservice to the wildlife professionals, dedicated conservationists and wildlife advocates who have fought to save them. While grizzlies have made a comeback, their recovery is still a delicate and uncertain effort. Grizzly bears occupy less than 2% of their historic range in the lower 48 and reproduce very slowly, at a rate of only 1-2 cubs every few years. In the Yellowstone region, the growth of the population has stalled since the early 2000s, and there was a 6% decline last year. The proposed rule leaves Greater Yellowstone grizzlies in the crosshairs, as states have made clear their plans to reduce the population, including through trophy hunts. Management of grizzly bears outside of the national parks would be left completely up to the states, which have historically been hostile to bears and other large carnivores. The current proposal would allow states to exceed maximum bear deaths for years before any review, allowing for potentially irreversible damage, and would allow complete eradication of bears in some areas. The loss of female grizzlies to trophy hunters who will not be able to tell the difference between a male and female bear could cause a steep, quick decline before emergency action can be taken. Additionally, the Yellowstone grizzly population remains isolated; further limiting their range and numbers could prevent them from ever connecting to other grizzly populations. People and bears can coexist. We should not let bears slide back towards extinction because of misplaced political hostility towards these magnificent and beloved creatures. The end result of this proposal will be fewer bears limited to less land and with access to fewer resources necessary for survival. For too long, human beings have assumed animals are non-sentient, unintelligent and, therefore, ours to disrespect and exploit as we will. Today, often new research is published that denies humankind's previously arrogant assumptions about other	WELC	
Threats of hunting cannot be understated and illegal killings are likely to increase as well.						Factor C	I believe that grizzly bear populations are still too low to remove them from the ESA. Threats of hunting cannot be understated and illegal killings are likely to increase as well. I do not believe the genetic diversity of existing populations can be preserved without the ESA. I believe that delisting will put the long term viability of this species at grave risk. Considering the rash of proposed ESA delistings in the last few years that have been based on flawed and weak claims not justified by the scientific record, I am extremely skeptical that delisting the grizzly is justified.	WELC	
Human behaviour is already responsible for significant Grizzly Bear mortality-----either directly via illegal hunting or via traffic deaths or indirectly due to their ever shrinking habitat.						Factor C	Please do not support the proposal to delist the Grizzly Bear. Human behaviour is already responsible for significant Grizzly Bear mortality-----either directly via illegal hunting or via traffic deaths or indirectly due to their ever shrinking habitat. Please keep in mind if it is money that is driving this decision, that these iconic animals of our West are worth far more alive ----with specific regard to the tourist industry.	WELC	
Delisting the grizzly should be a crime . They have a hard enough time surviving . Poaching is already a problem obviously with the death of yellow stones Scar Face Aka 211						Factor C	Delisting the grizzly should be a crime . They have a hard enough time surviving . Poaching is already a problem obviously with the death of yellow stones Scar Face Aka 211	WELC	
It is unclear to me that there is scientific evidence showing a balance of predators in the Greater Yellowstone since wolves were only re-introduced relatively recently. There is a complex relationship between wolves and bears and allowing this hunting at this time is a premature action.						Factor C	It is unclear to me that there is scientific evidence showing a balance of predators in the Greater Yellowstone since wolves were only re-introduced relatively recently. There is a complex relationship between wolves and bears and allowing this hunting at this time is a premature action.	WELC	
Knowing many people who live and recreate in the Yellowstone ecosystem I am shocked at how many tell me about frequent encounters with these bears. I am convinced the reason that the bears so commonly show little or no fear of humans is that management policies have prohibited people from engaging in activities which discourage bears from interaction with humans, including defense of life and property in all but the most dire of circumstances. Bears are very capable of learning from their experiences and I believe their behavior will change in a positive way resulting in less conflict if the proposed rule is adapted, this will be good for the bears in the long term, if sows teach their young to avoid humans rather than being indifferent to them, or worse yet seeking them out, more cubs will survive.						Factor C	I fully support removing the greater Yellowstone ecosystem population of grizzly bears from the list for both practical reasons of coexisting with bears and from a biological standpoint. Without going in to regurgitating data to support my statement I will just say I know that the professional biologists from USFWS would not make such a proposal if there were not sufficient evidence to warrant doing so. I also know that the states involved are fully capable of managing the bears without risk of taking a step backward in terms of maintaining a viable population in the Yellowstone ecosystem or achieving recovery in other ecosystems. As far as concerns about the bears becoming genetically isolated first of all I would point out that a slight reduction of bears (if there even is) within the Yellowstone ecosystem is not going to have any affect. I would think genetic diversity within the Yellowstone ecosystem relies on transient animals from other ecosystems arriving in the Yellowstone ecosystem, keeping in mind that these transient animals will still be fully protected until their arrival I believe the delisting would have almost no affect in this regard. Having lived in close proximity to grizzlies from other ecosystems all my life I find it abundantly evident that they are recovering and dispersing and have no doubts genetic diversity is not in any danger from the proposed rule, if anything perhaps a slight reduction in the Yellowstone population may be beneficial in this regard as it would make room for transient animals to establish territories and eventually interbreed with the existing population. Knowing many people who live and recreate in the Yellowstone ecosystem I am shocked at how many tell me about frequent encounters with these bears. I am convinced the reason that the bears so commonly show little or no fear of humans is that management policies have prohibited people from engaging in activities which discourage bears from interaction with humans, including defense of life and property in all but the most dire of circumstances. Bears are very capable of learning from their experiences and I believe their behavior will change in a positive way resulting in less conflict if the proposed rule is adapted, this will be good for the bears in the long term, if sows teach their young to avoid humans rather than being indifferent to them, or worse yet seeking them out, more cubs will survive. While on the subject of cub survival I would also like to point out that if regulated hunting was established in any portion of the ecosystem it also has the potential of benefiting overall cub survival rates as well by reducing the number of mature bears	FWS-R6-ES-2016-0042-0075	

Population growth has stagnated since the early 2000s and has even been in decline in recent years. Most recently in fact, the Yellowstone grizzly population declined by 43 bears in 2015 alone, representing a massive 6% population decline in a single year. The USFWS has argued that the population growth has stagnated because the population has reached carrying capacity. In reality, what happened is the bears major food sources are in a state of disaster and more bears are roaming more widely in search of different foods and getting killed by humans in the process.						Factor C	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	
Many of the most important food sources for Yellowstone grizzlies have suffered catastrophic declines in recent years. The nuts of the whitebark pine tree, for instance have long been regarded as the single most important food source for grizzlies, providing a much needed caloric boost going into hibernation, especially for females with cubs. During years of good whitebark cone production, bears stay in the high country during the fall and are much less likely to come into conflict with people. In the last two decades, the whitebark pine stands in the ecosystem have been decimated by blister rust and a pine beetle epidemic (driven by climate change) which has killed most of the mature whitebark pine trees in the ecosystem. Another important food source, the cutthroat trout of Yellowstone lake and its tributaries, has also experienced massive declines due to predation from non-native lake trout. There are further questions about another important food source, the army cutworm moths, which migrate to the ecosystem's highest mountains during the summer from agricultural lands on the great plains where they are threatened by heavy pesticide use.						Factor C	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	

Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. A						Factor C	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears / 600 bears in Wyoming.	FWS-R6-ES-2016-0042-0320	
Bears are facing an uncertain future. Last year alone 43 bears were killed in conflicts, most of which were food related deaths.						Factor C	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears / 600 bears in Wyoming.	FWS-R6-ES-2016-0042-0320	

Killing to remove a bear from incidents caused by humans will most likely to continue because of human desires to encroach on bear territory. Bears are never the problem.						Factor C	I am writing in opposition to Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife because sufficient consideration has not been given to the providing of corridors for Grizzly Bears in order for the genetic health of the species. While there has been some mention of importing boars into the GYE for breeding purposes, this is not the correct policy. At present the Grizzly Bear population if the GYE is cut off from traveling for any purpose of finding suitable habitat for breeding from any other population. If a Grizzly bear were to leave either Yellowstone National Park or Grand Teton National Park for any habitat or breeding needs in order to maintain a viable genetic pool they could or would most likely be killed. And you have not taken sufficient information into consideration regarding our changing climate. Unless you proved safe passage for Grizzly Bears in order to reach viable habitat--which includes food sources necessary to their survival, you should not be opening up Grizzly bears to trophy hunting. There has never been proven the necessity for the killing of Grizzly bears for sport. Killing to remove a bear from incidents caused by humans will most likely to continue because of human desires to encroach on bear territory. Bears are never the problem. Humans are. Until you provide safe passage for Grizzly bears from one gene pool area to another you should not delist them. More than one agency (as I am almost certain you are aware) has opposed delisting based on science. Unless you wish for so few bears that their population is not viable in YNP or GTNP and the GYE you should refrain from putting the Grizzly bear in the cross hairs of a trophy hunter's rifle. You should be demonstrating that you understand what you will be causing by delisting Grizzly bears. No hunter's life depends on a dead Grizzly bear. Grizzly bears depend now on humans for their lives. No human male or female has proven the need to chop off a head and paws and skin a bear to keep his family warm.	FWS-R6-ES-2016-0042-0381	
GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected.						Factor C	I do not support the delisting of Grizzly Bears in GYE. THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected.	FWS-R6-ES-2016-0042-5651	
The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, even resistant to managing a species of high importance to the non-hunting public and/or the federal government (i.e. - Gray wolves). In addition, even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management.						Factor C	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without	FWS-R6-ES-2016-0042-0463	

Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures.						Factor C	WHY? IS MY QUESTION! Why in the world would you try to eradicate the Grizzly Bear population again? It is so unfortunate that Fish and Wildlife service doesn't seem to exist to protect the wildlife but to destroy it. You always come up with phony reasons to open fire on anything that moves. I get the feeling that you are a bunch of hunters anxious to pull the trigger legally. Just to refresh your memory: The grizzly bear once roamed free throughout the Western states, including 52 of California's 58 counties. Abundant in the Central Valley and North Bay in the 1800s, California grizzlies were also seen feasting on decaying whale carcasses along the shores of Monterey Bay. The last grizzly in California was shot by hunters in the 1920s, although it remains the familiar icon on our state flag. In state after state, ranchers and hunters wiped out local populations, until they were isolated in but a few small ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the greater Yellowstone population was estimated at 300 BEARS. Due to coordinated efforts by federal and state resources agencies mandated by the ESA, cooperative research, monitoring, habitat protections and regulatory mechanisms, including a strict hunting ban, their numbers have grown over the past 30 years to slightly more than 600 BEARS today, according to U.S. Fish and Wildlife's bear recovery coordinator, Chris Servheen. This is a success story that must be acknowledged and celebrated. I do not have to give you the details about why Grizzlies should remain protected, you know them as well as I do. But just in case: While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone	FWS-R6-ES-2016-0042-5079	
Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source."						Factor C	I am a veterinarian, a biologist and a concerned citizen and for the reasons stated below, it is my firm contention that grizzly bears should not be delisted in the Greater Yellowstone Ecosystem. Actual numbers of grizzly bears are merely estimates as are the numbers required to support a sustainable populations for one of the slowest-reproducing mammals in North America with female grizzlies giving birth only every three years, if conditions are right. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399 would be threatened by the delisting. FWS could well see more than 40 years of recovery efforts squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America.. By the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range and grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yaak region." Therefore, the grizzly bear cannot be delisted in just the GYE. The management of isolated populations of free-ranging canines like grizzly bears and wolves is flawed. The Greater	FWS-R6-ES-2016-0042-5116	

5. It would seem that Yellowstone Park must have wildlife to support the financial aspect of how this park is maintained. If the Bear population were to continue to grow unchecked it will become inevitable that bears will kill other Grizzly Bears, black bears, and anything else that is a food resource. Does it serve the bear to allow bears to fight each other for sustenance?						Factor C	While the Grizzly Bear is an icon of the Yellowstone Eco System I suggest these observations: 1. Yellowstone Park is overpopulated with people. 2. The concentration of people on the limited road access has driven these icons further away from mass crowds gawking at wildlife. 3. The number of bears outside of the park has reached a potential crisis point. 4. Every predator (defined as an animal that will kill anything to be fed) needs a predator. The sad truth is the human is the only predator of the Grizzly. It is our responsibility that these bears are controlled. This does not mean that they should never kill a domesticated animal but they should be regulated. 5. It would seem that Yellowstone Park must have wildlife to support the financial aspect of how this park is maintained. If the Bear population were to continue to grow unchecked it will become inevitable that bears will kill other Grizzly Bears, black bears, and anything else that is a food resource. Does it serve the bear to allow bears to fight each other for sustenance? My suggestion is to evaluate how the Park manages the tourists. They are the top of the food chain. Then create new zones for tourists within the Park. After all it was created "for the people" and today it is managed not for the people. Millions come in the summers and it is highly unlikely they will see a Grizzly Bear, let alone any wildlife other than Buffalo which are about the same as Angus cows grazing Paradise Valley. It is really disappointing to see how poorly Yellowstone Park is managed. It is embarrassing to see how the visitors who come to interact with wildlife are directed to a highway and accommodated with shabby campgrounds, and poor housing. It has become a theme park without a theme.	FWS-R6-ES-2016-0042-5131	
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With forest fires a new threat in many areas, hunting and/or poaching, and natural factors can threaten the species right back onto the endangered list.						Factor C	We need to take the presence of these animals more seriously. With forest fires a new threat in many areas, hunting and/or poaching, and natural factors can threaten the species right back onto the endangered list. We don't need to bow to the pressures of trophy hunters; establish a steady population that doesn't become stuck with a single genetic strain before we go forward with any consideration of delisting.	FWS-R6-ES-2016-0042-5134	

We also disagree with trophy hunting grizzly bears.						Factor C	To the U.S. Fish and Wildlife Service: I am writing for the board of directors of the North Fork Preservation Association to comment on the proposal to remove Grizzly Bears in the Greater Yellowstone Ecosystem from the Federal List of endangered and threatened wildlife. Our community on the North Fork of the Flathead River in Northwest Montana, sitting just below the U.S./Canadian border next to Glacier National Park is one of the most ecologically diverse regions in North America. We also have the highest population of Grizzly Bears in the lower 48 states. Surrounded by public land and wildlife habitat, we have learned to live peacefully in the Grizzly country. We value these bears and have enjoyed watching their numbers grow over the last few decades. The conservation efforts that have been deployed to encourage the Grizzly Bears recovery have been a great success. However, these efforts should be continued until Grizzly populations are connected over the entire landscape between Yellowstone and the Yukon. Isolated populations do not do well over the long run. Grizzly Bears need to be allowed to roam freely through all areas with suitable habitat. The Yellowstone grizzly bear population is an isolated population. There is very little evidence that Grizzly Bears from Yellowstone travel to other Grizzly Bear populations to the north. Without this connectivity, genetic diversity cannot remain strong in the Yellowstone population. For this reason, we feel that it is too early to delist Grizzly Bears. We also disagree with trophy hunting grizzly bears. It has taken many decades and millions of our tax dollars to change the trend toward extinction and hunting these iconic creatures seems contrary to everything that we have achieved. In addition, the status of Grizzly Bears in the public mind has risen. Many visitors come to Montana and Wyoming hoping to see a Grizzly Bear. These bears are the heritage of all of the people in the U.S., not just those of us who live in Montana, Wyoming, or Idaho. Just from an economic viewpoint these Bears generate more income for Montana, Wyoming, and Idaho from visitors than will ever be realized from 10-50 annual Trophy Tags. There are many more people who want to see a grizzly bear than shoot one. There also needs to be adequate and continual funding for Bear conservation in place, including bear management personnel to deal with bear-people conflicts, before delisting happens. The loss of federal money for conservation efforts is a major concern regarding delisting. For these reasons, we oppose the delisting of Grizzly Bears at this time.	FWS-R6-ES-2016-0042-5128	Against trophy hunting.
In the 40 years grizzlies were protected under the Endangered Species Act, the population rose from 136 to an estimated 720 individuals in the GYE. While this should be celebrated, it should not mean that safeguards for grizzly bears are removed and sport hunts are commended. This past year, the Interagency Grizzly Bear Committee study team reported 59 known and probable grizzly bear mortalities, 55 of which were human caused. How can our GYE grizzly bear population sustain this in addition to added mortalities as a result of state level hunts that would occur upon delisting?						Factor C	See Attached Attachments Sheehy Pike Lisa	FWS-R6-ES-2016-0042-0522	
There is already a lot of human caused mortality outside the PCA, especially in the Upper Green River and Wind River areas. This probably will become worse since the State will have primary management control in these areas.						Factor C	1) The Primary Conservation Area... (PCA) does not include all of Grand Teton National Park and areas of the Northern Wind Rivers and Upper Green River where grizzlies have long been established. The PCA should be expanded and updated to include these and all areas where grizzlies are currently found. 2) Areas outside the PCA are referred to the Demographic Management Area (DMA). The DMA will be mostly managed by state agencies. Fortunately a good chunk of grizzly habitat falls within tribal lands (in WY) not subject to heavy handed state mismanagement of predators. 3) The entirety of the Wyoming Range, Caribou Range (Idaho), and the Targhee National Forest west of Jackson, WY should be included in the DMA. Grizzly populations currently in the Wyoming Range and other areas that fall outside of the DMA, are subject to extreme management actions and killing by hunters. No incentive to protect bears in suitable habitat outside the DMA. 4) Grizzlies located outside the PCA will be "allowed to expand into biologically suitable and socially acceptable areas". How does a state, hostile to predators, identify what is socially acceptable. A blank check for heavy handed management. Again, areas in the Upper Green, around Teton Park, and the northern Wind River Range with established grizzly populations most likely will see dramatic decreases in numbers. 5) Maintain only 500 grizzlies in the Greater Yellowstone Ecosystem (GYE). With estimates over 700, there is no motivation for the states to maintain grizzly numbers. 6) There is already a lot of human caused mortality outside the PCA, especially in the Upper Green River and Wind River areas. This probably will become worse since the State will have primary management control in these areas. 7) There are still healthy stands of Whitebark Pine outside the PCA in the Northern and Southern Wind Rivers, vital food for grizzlies. These areas will be primarily managed by the states. 8) The Wyoming management of grizzlies in the DMA as stated in their management plan, "significant consideration will be given to humans". We can only assume grizzlies will pay with their lives more often at the hands of state employees. Socially Accepted = Intolerance. 9) Wyoming Plan and handling of nuisance bears; "Grizzlies displaying natural aggression may be removed from the population." Natural aggression is defined as a grizzly defending itself, cubs, or food source. In the DMA, seems like grizzlies will be killed when they simply defend themselves by our intrusions. 10) A grizzly getting into chicken coops (without electric fences) or other means to guard their	FWS-R6-ES-2016-0042-0533	

Climate changes, temperature increases, loss of white bark pine and other critical habitat components are totally unpredictable and are happening exponentially faster than predicted or considered. The apex predators are unable to adapt to those changes and will all be lost within a very short period of time. In the mean time we need to do everything humanly possible to provide them a bridge that helps them make the necessary adjustments, if that will even be possible. Humans need to stay out of areas that the grizzly needs for survival. If a bear-human conflict should occur I want to see nonlethal means used, prior to lethal removal.						Factor C	Please do not remove (delist) the grizzly bear from the protections stated in the Endangered Species Act. Even though it may appear that the grizzly has met the standard for the delisting rule, which opens the door for legal hunting, that is not the appropriate means of population control. The long term effects of the proposed delist control measures are tenuous at best. Climate changes, temperature increases, loss of white bark pine and other critical habitat components are totally unpredictable and are happening exponentially faster than predicted or considered. The apex predators are unable to adapt to those changes and will all be lost within a very short period of time. In the mean time we need to do everything humanly possible to provide them a bridge that helps them make the necessary adjustments, if that will even be possible. Humans need to stay out of areas that the grizzly needs for survival. If a bear-human conflict should occur I want to see nonlethal means used, prior to lethal removal. Travelers from all over the world visit the Yellowstone region in hopes of seeing and photographing the apex predators. That brings a lot of revenue into the local economies surrounding the Yellowstone region. It brings a lot of good will with it as well. Grizzly bears are not just a treasure of the state of Montana and the United States, they are a treasure of this planet and all of the people and children of future generations, and we need to start thinking in the bigger sense using an expanded perspective that we are the stewards of this planet and all the species who inhabit it. Please do the right thing and do not delist the grizzly, and, do not allow hunting of it for at least (5) five years post-delisting. Thank you for considering my comments and concerns.	FWS-R6-ES-2016-0042-0614	
In my opinion the delisting plan at the federal and state level needs to move forward finding a way to preserve the habitat and generate and preserve tolerance for the grizzly as both go hand in hand. Conflict reduction, human safety and education like the Bearwise program need to be top priorities.						Factor C	See attached file(s) Attachments Delisting Grizzly Comments 4-12-16	FWS-R6-ES-2016-0042-0673	
6--The inability to forecast human caused bear mortality, that is only going to increase with development and population growth.						Factor C	As a lifelong resident of the Greater Yellowstone Ecosystem, and one who has worked directly with the Inter Agency Recovery Team over a span of many years, I strongly oppose the delisting of the Grizzly bear. I join those who are concerned about: 1--The voracious desire, most notably by surrounding states of Wyoming and Montana, to capitalize financially on trophy hunting. 2--The under-studied repercussions of climate change and the impact on the bear's food supply. 3--Shrinking habitat, that is even now far too limited. 4--The unreasonable reliance of FWS on unreliable bear numbers. 5--The absence of corridors to permit grizzly migration. 6--The inability to forecast human caused bear mortality, that is only going to increase with development and population growth. The Yellowstone Grizzly is a national treasure. Removal from endangered/threatened status is trading that treasure for fool's gold. While it may provide a boastful feather in the cap for FWS, it will prove to be one of the most ill-conceived proposals ever advanced by FWS.	FWS-R6-ES-2016-0042-0672	
The lack of food sources is what cause the very few and far between encounters with ranchers livestock. The adjoining states have already said and have it in their plans to allow killing of any grizzlies who pose a threat to their livestock.						Factor C	I strongly OPPOSE the delisting of the GYE grizzlies. The grizzly is facing losses of some of their key food sources such as the white bark pine. This has been studied and the concerns of loss of these foods has been supported by the Ninth Circuit Court of Appeals, Federal District Judge Molloy. The cutthroat trout are also diminishing due to the introduction of non native species causing 2 of the grizzlies main food sources to scarce. With these food supplies short they must look elsewhere for new foods to replace these. With no protections outside the park they will not have the habitat needed to establish new food sources. The lack of food sources is what cause the very few and far between encounters with ranchers livestock. The adjoining states have already said and have it in their plans to allow killing of any grizzlies who pose a threat to their livestock. The reproduction rate of the grizzly is slow and without the necessary food sources to make it through hibernation there will be fewer births. If you consider this in conjunction with the amount of bears each state is going to allowed to be hunted, the number of bears that will inevitably be killed because due to ranchers seeing them as a threat to their livestock, the current population of bears will not stand the reduction without grave consequences. The citizens of the united states have paid for the protection of these bears. Your office has been charged with the duty of safe guarding these bears and delisting them without more thought and planning for the delisting will certainly put them back in an endangered state. The areas which border the GYE is becoming more heavily populated. With the encroachment of development the bears have very little space in which to travel from one population to another for breeding. If there are no safe guards for the bears to migrate to other areas the population will be trapped, this again brings them to the point of being endangered. There is no reason for hunting a bear other than sport and the money the states have proposed to charge for the hunting of this prized animal will in no way cover the cost the tax payers have already paid to protect that bear. It just doesn't make sense. The ranches are compensated by the numerous willing organizations for the loss of any animal killed by a bear. So it is not like the grizzlies are out there destroying herds of cattle. In fact as per your own studies the losses of ranchers has been minimal, and the ranchers do not loss money. At the very least the Primary Conservation area should be increased to include bear corridors, and am ample area around the entire GYE for the bears. Encounters with bears for people are rare, and most of these	FWS-R6-ES-2016-0042-0739	

As the human population is only increasing and will continue to increase into the future, the loss of habitat coupled with increased human conflicts and associated mortalities will only increase.						Factor C	I oppose delisting of the grizzly bear in the GYA, as I anticipate the bear would suffer immediate setbacks. As the human population is only increasing and will continue to increase into the future, the loss of habitat coupled with increased human conflicts and associated mortalities will only increase. The population is minimal at present, particularly when considering genetics and females. The likelihood for corridors to link the GYA bears with bears in other ecosystems is remote and will continue to decline. Increased mortalities will normally result in a greater number of lost females that would no longer contribute offspring. Any of the scientists involved with the IGBST know there is uncertainty in the outcome of delisting the grizzly bear. Why take the chance of screwing something up that has taken so long to establish? I urge USFWS to withdraw from their continued efforts to delist the grizzly bear.	FWS-R6-ES-2016-0042-0744	
The reproduction rate of the grizzly is slow and without the necessary food sources to make it through hibernation there will be fewer births. If you consider this in conjunction with the amount of bears each state is going to allowed to be hunted, the number of bears that will inevitably be killed because due to ranchers seeing them as a threat to their livestock, the current population of bears will not stand the reduction without grave consequences.						Factor C	I strongly OPPOSE the delisting of the GYE grizzlies. The grizzly is facing losses of some of their key food sources such as the white bark pine. This has been studied and the concerns of loss of these foods has been supported by the Ninth Circuit Court of Appeals, Federal District Judge Molloy. The cutthroat trout are also diminishing due to the introduction of non native species causing 2 of the grizzlies main food sources to scarce. With these food supplies short they must look elsewhere for new foods to replace these. With no protections outside the park they will not have the habitat needed to establish new food sources. The lack of food sources is what cause the very few and far between encounters with ranchers livestock. The adjoining states have already said and have it in their plans to allow killing of any grizzlies who pose a threat to their livestock. The reproduction rate of the grizzly is slow and without the necessary food sources to make it through hibernation there will be fewer births. If you consider this in conjunction with the amount of bears each state is going to allowed to be hunted, the number of bears that will inevitably be killed because due to ranchers seeing them as a threat to their livestock, the current population of bears will not stand the reduction without grave consequences. The citizens of the united states have paid for the protection of these bears. Your office has been charged with the duty of safe guarding these bears and delisting them without more thought and planning for the delisting will certainly put them back in an endangered state. The areas which border the GYE is becoming more heavily populated. With the encroachment of development the bears have very little space in which to travel from one population to another for breeding. If there are no safe guards for the bears to migrate to other areas the population will be trapped, this again brings them to the point of being endangered. There is no reason for hunting a bear other than sport and the money the states have proposed to charge for the hunting of this prized animal will in no way cover the cost the tax payers have already paid to protect that bear. It just doesn't make sense. The ranches are compensated by the numerous willing organizations for the loss of any animal killed by a bear. So it is not like the grizzlies are out there destroying herds of cattle. In fact as per your own studies the losses of ranchers has been minimal, and the ranchers do not loss money. At the very least the Primary Conservation area should be increased to include bear corridors, and am ample area around the entire GYE for the bears. Encounters with bears for people are rare, and most of these	FWS-R6-ES-2016-0042-0739	
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Encounters with bears for people are rare, and most of those have proven it was not the bears fault, but the people's; regardless those bears have been killed. If people are going to go into bear country and not be prepared it is their fault and the entire population of bears should not have to pay the price for human stupidity.						Factor C	I strongly OPPOSE the delisting of the GYE grizzlies. The grizzly is facing losses of some of their key food sources such as the white bark pine. This has been studied and the concerns of loss of these foods has been supported by the Ninth Circuit Court of Appeals, Federal District Judge Molloy. The cutthroat trout are also diminishing due to the introduction of non native species causing 2 of the grizzlies main food sources to scarce. With these food supplies short they must look elsewhere for new foods to replace these. With no protections outside the park they will not have the habitat needed to establish new food sources. The lack of food sources is what cause the very few and far between encounters with ranchers livestock. The adjoining states have already said and have it in their plans to allow killing of any grizzlies who pose a threat to their livestock. The reproduction rate of the grizzly is slow and without the necessary food sources to make it through hibernation there will be fewer births. If you consider this in conjunction with the amount of bears each state is going to allowed to be hunted, the number of bears that will inevitably be killed because due to ranchers seeing them as a threat to their livestock, the current population of bears will not stand the reduction without grave consequences. The citizens of the united states have paid for the protection of these bears. Your office has been charged with the duty of safe guarding these bears and delisting them without more thought and planning for the delisting will certainly put them back in an endangered state. The areas which border the GYE is becoming more heavily populated. With the encroachment of development the bears have very little space in which to travel from one population to another for breeding. If there are no safe guards for the bears to migrate to other areas the population will be trapped, this again brings them to the point of being endangered. There is no reason for hunting a bear other than sport and the money the states have proposed to charge for the hunting of this prized animal will in no way cover the cost the tax payers have already paid to protect that bear. It just doesn;t make sense. The ranches are compensated by the numerous willing organizations for the loss of any animal killed by a bear. So it is not like the grizzlies are out there destroying herds of cattle. In fact as per your own studies the losses of ranchers has been minimal, and the ranchers do not loss money. At the very least the Primary Conservation area should be increased to include bear corridors, and am ample area around the entire GYE for the bears. Encounters with bears for people are rare, and most of those	FWS-R6-ES-2016-0042-0739	
The states of Wyoming and Idaho allow for baiting of bears. They are saying it will not be allowed for the grizzly but it is not in their plan and when someone baits a black bear and a grizzly shows up that someone will shoot it and claim they thought it was a black bear. The current grizzly population cannot withstand these additional killings.						Factor C	I strongly OPPOSE the delisting of the GYE grizzlies. The grizzly is facing losses of some of their key food sources such as the white bark pine. This has been studied and the concerns of loss of these foods has been supported by the Ninth Circuit Court of Appeals, Federal District Judge Molloy. The cutthroat trout are also diminishing due to the introduction of non native species causing 2 of the grizzlies main food sources to scarce. With these food supplies short they must look elsewhere for new foods to replace these. With no protections outside the park they will not have the habitat needed to establish new food sources. The lack of food sources is what cause the very few and far between encounters with ranchers livestock. The adjoining states have already said and have it in their plans to allow killing of any grizzlies who pose a threat to their livestock. The reproduction rate of the grizzly is slow and without the necessary food sources to make it through hibernation there will be fewer births. If you consider this in conjunction with the amount of bears each state is going to allowed to be hunted, the number of bears that will inevitably be killed because due to ranchers seeing them as a threat to their livestock, the current population of bears will not stand the reduction without grave consequences. The citizens of the united states have paid for the protection of these bears. Your office has been charged with the duty of safe guarding these bears and delisting them without more thought and planning for the delisting will certainly put them back in an endangered state. The areas which border the GYE is becoming more heavily populated. With the encroachment of development the bears have very little space in which to travel from one population to another for breeding. If there are no safe guards for the bears to migrate to other areas the population will be trapped, this again brings them to the point of being endangered. There is no reason for hunting a bear other than sport and the money the states have proposed to charge for the hunting of this prized animal will in no way cover the cost the tax payers have already paid to protect that bear. It just doesn;t make sense. The ranches are compensated by the numerous willing organizations for the loss of any animal killed by a bear. So it is not like the grizzlies are out there destroying herds of cattle. In fact as per your own studies the losses of ranchers has been minimal, and the ranchers do not loss money. At the very least the Primary Conservation area should be increased to include bear corridors, and am ample area around the entire GYE for the bears. Encounters with bears for people are rare, and most of those	FWS-R6-ES-2016-0042-0739	

The unmistakable message is that the only measure of value of these magnificent animals is as a head on the wall or a rug on the floor. Of the reported 59 grizzlies killed in 2015, more than half were killed in interactions with hunters who mistook grizzlies for black bears or shot them just because they imagined themselves threatened. There has been virtually no penalty or fine for illegally killing a grizzly, even though serious penalties exist on the books. Even blatant poaching is dismissed with barely a swat on the wrist.						Factor C	The only certain outcome of delisting the Yellowstone grizzly bear is that it will result in trophy hunting of bears by the states of Wyoming, Montana, and Idaho. After spending a federal fortune each year since 1975 to bring the grizzly back from near extinction, we're now poised to abruptly begin killing them off for the bargain price of a hunting license. Why this fierce madness to kill our largest carnivore? I am a hunter who doesn't buy into the fatuous claims about the need to kill carnivores. Apex predators serve a complex and necessary role in ecological communities and in their own wild social communities. America's great bears today threaten our minds more than they do our bodies; by reminding us that upon occasions still possible today, we mighty humans were once just another flavor of meat. They challenge our notion of how we fit into the world and our dominion over it. And that's why we need them alive and roaming the land. A trophy hunt for grizzlies could begin, if we don't stop it, as early as next year. The danger is simple: In an isolated, island ecosystem like Yellowstone, once the number of dead bears greatly exceeds the number of cubs born, you're headed toward extinction. Here are the current stats: The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the, current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality. There is a very dark side to this lust for killing top carnivores. The first and easiest grizzlies to be killed will be the roadside bears of Yellowstone and Grand Teton national parks. These loved and most photographed bears have little fear of humans since wildlife is protected in national parks. Thousands of park visitors have thrilled over viewing grizzly bear families (mother bears with young are more frequent along roads). One famous mother grizzly, known as number 399, is now in hibernation but frequents roadways in Grand Teton. A Jackson Hole, Wyoming, outfitter has reportedly pledged that this is the first bear he would target: <i>"because he hates federal government, hates living environmentalists, and the Endangered Species"</i>	FWS-R6-ES-2016-0042-0779	
Trophy hunters would also kill female grizzlies, the reproductive engines of the ecosystem. Even if state game departments say, don't shoot bears with cubs at their side, a hunter need only claim he didn't see the little bears. Additionally, even experts can't unfailingly tell an adult female grizzly bear from a solitary male of equivalent size.						Factor C	The only certain outcome of delisting the Yellowstone grizzly bear is that it will result in trophy hunting of bears by the states of Wyoming, Montana, and Idaho. After spending a federal fortune each year since 1975 to bring the grizzly back from near extinction, we're now poised to abruptly begin killing them off for the bargain price of a hunting license. Why this fierce madness to kill our largest carnivore? I am a hunter who doesn't buy into the fatuous claims about the need to kill carnivores. Apex predators serve a complex and necessary role in ecological communities and in their own wild social communities. America's great bears today threaten our minds more than they do our bodies; by reminding us that upon occasions still possible today, we mighty humans were once just another flavor of meat. They challenge our notion of how we fit into the world and our dominion over it. And that's why we need them alive and roaming the land. A trophy hunt for grizzlies could begin, if we don't stop it, as early as next year. The danger is simple: In an isolated, island ecosystem like Yellowstone, once the number of dead bears greatly exceeds the number of cubs born, you're headed toward extinction. Here are the current stats: The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the, current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality. There is a very dark side to this lust for killing top carnivores. The first and easiest grizzlies to be killed will be the roadside bears of Yellowstone and Grand Teton national parks. These loved and most photographed bears have little fear of humans since wildlife is protected in national parks. Thousands of park visitors have thrilled over viewing grizzly bear families (mother bears with young are more frequent along roads). One famous mother grizzly, known as number 399, is now in hibernation but frequents roadways in Grand Teton. A Jackson Hole, Wyoming, outfitter has reportedly pledged that this is the first bear he would target: <i>"because he hates federal government, hates living environmentalists, and the Endangered Species"</i>	FWS-R6-ES-2016-0042-0779	
We do not know how the current population of grizzlies will respond to their recent increase in human caused mortality, reduction in white bark pine nuts, reduction in Yellowstone Cutthroat, and reduction in the elk population.						Factor C	I am against removing protection from grizzlies in the Yellowstone ecosystem by de-listing. We do not know how the current population of grizzlies will respond to their recent increase in human caused mortality, reduction in white bark pine nuts, reduction in Yellowstone Cutthroat, and reduction in the elk population. We know that if de-listed, Wyoming, Montana, and likely Idaho will enable trophy hunting of the grizzly. People taking out the dominate males from a stressed population will be bad for the species. The bears need at least five more years of protection to determine how the population will fare before we start hunting them. I am a Westerner, living in Idaho for over 36 years.	FWS-R6-ES-2016-0042-1083	

Call it an upgrade in condition, but please do not open the door to hunting, especially trophy hunting, which is a cruel and despicable waste of life. Bears that come too close to private property and human habitations should be darted and relocated, and killed only on the rare occasions that they come back and cause damage.						Factor C	Please do not delist Grizzly bears. It's unfortunate that in our society, there seem to be only two categories of management: "listed under the ESA" or "open season." I do not trust state fish and game agencies to manage these animals responsibly. They only serve hunters, trappers and outfitters, and do not care about conservation biology. We can see what a mess they have made of wolf management in all the states that have delisted wolves. I'm not saying that management is not required, but I am saying that state game agencies are political entities that have demonstrated no interest in these species, other than as targets for hunters. They even hold wildlife "derbies," which is illustrative of their mindset. We need a different kind of management - ecosystem management - and the FWS is the entity best able to carry this out. The ESA requires the government to recover not only species, but the "ecosystems upon which they depend," and until we have re-established those functioning ecosystems, individual species should remain listed, perhaps in a "threatened" status. Call it an upgrade in condition, but please do not open the door to hunting, especially trophy hunting, which is a cruel and despicable waste of life. Bears that come too close to private property and human habitations should be darted and relocated, and killed only on the rare occasions that they come back and cause damage. I would submit that the Greater Yellowstone Ecosystem needs more habitat protection, so that large animals (elk, wolves, bears, bison, etc.) can move freely without being killed by humans. The real answer is not to keep bears to a minimum "viable" population and call that "recovery," but to provide more habitat. I recognize the difficulty in that, but I urge you to work toward establishment of the great Yellowstone-to-Yukon corridor, which is the only lasting hope of survival for these great charismatic species. No good can come of hunting grizzly bears.	FWS-R6-ES-2016-0042-5335	
The number of human and grizzly encounters have constantly risen. Also the domestic animal grizzly bear conflicts have continually risen which is big concern to our livestock producers.						Factor C	It is time to delist the grizzly bear in Wyoming. As a member of the Wyoming legislature serving of the committee that oversees the WY Game and Fish I have been involved with the grizzly bear management. We have witnessed the growth in the population over the past ten years. I feel the good increase in both the number of bears and the expansion of their locations show they have reached the level where they can be managed and a population maintained by the WY Game and Fish. The Wyoming Game and Fish have shown they have the manpower and resources to monitor the grizzly bear population and manage them for the benefit of all concerned. I have also hunted elk and big horn sheep in the Yellowstone drainage for many years and seen the numbers of grizzly bears increase from maybe seeing a grizzly to how many do we see during the hunt. The number of human and grizzly encounters have constantly risen. Also the domestic animal grizzly bear conflicts have continually risen which is big concern to our livestock producers. Your following through with your plan to delist, for the many reasons people are bringing up and also your own finding do demonstrate it is time to delist this great animal. thanks for your consideration. Allen Jaggi Wyoming outdoorsman Wyoming Legislature House District # 19	FWS-R6-ES-2016-0042-1235	
Allowing the grizzly bear population to continue to grow out of control places the public visiting Yellowstone National Park at substantial risk of injury and death. The grizzly bear is a very dangerous bear that can viciously attack Yellowstone visitors with little or no provocation. I am sorry to say that most Yellowstone visitors are bear-stupid thinking that they can safely get a close up of a grizzly bear with their smartphone. Furthermore, I expect that almost all Yellowstone visitors don't have a can of bear spray with them when visiting the Park. I think that failure to delist the grizzly bear now will mean that several Yellowstone visitors will be mauled or killed by grizzly bears each year as the grizzly bear population continues to increase geometrically.						Factor C	I think that the grizzly bear should be delisted in the Greater Yellowstone Ecosystem and management of the grizzly bear population should be turned over to the States. It is abundantly clear that the grizzly bear population has recovered to the point that delisting is appropriate. i) The States (Wyoming Montana, Idaho, and any other relevant state) in the Greater Yellowstone Ecosystem are very well equipped to manage the grizzly bear population. Each State has been successfully managing the population of wildlife within its boundaries for over 20 years. The States' natural resources departments with the professional staff members including wildlife biologists who have the training and experience to manage the grizzly bear population within their respect boundaries. Therefore I think that the management of the grizzly bear population should be turned over to the States. ii) The failure to begin State management of the grizzly bear population at this time poses substantial public risk. Allowing the grizzly bear population to continue to grow out of control places the public visiting Yellowstone National Park at substantial risk of injury and death. The grizzly bear is a very dangerous bear that can viciously attack Yellowstone visitors with little or no provocation. I am sorry to say that most Yellowstone visitors are bear-stupid thinking that they can safely get a close up of a grizzly bear with their smartphone. Furthermore, I expect that almost all Yellowstone visitors don't have a can of bear spray with them when visiting the Park. I think that failure to delist the grizzly bear now will mean that several Yellowstone visitors will be mauled or killed by grizzly bears each year as the grizzly bear population continues to increase geometrically. iii) Grizzly bears don't have any natural predators that control their population growth. Therefore, the grizzly bear population within the Greater Yellowstone Ecosystem will increase geometrically if they are not delisted now. Almost every grizzly bear sow has 2 cubs each year, and since almost all of the cubs will survive each year, the grizzly bear population will increase essentially geometrically in the coming years. iv) Allowing the grizzly bear population to grow out of control will detrimentally impact the number of elk, deer, bison and other animals in the food chain in the Greater Yellowstone Ecosystem. Just as the wolf population has a detrimental impact on these other animals, too many grizzly bears in the Greater Yellowstone Ecosystem will exacerbate this depredation even further. Recently wolves killed over a dozen elk just for the fun of it as they could not possibly consume all of the elk they killed. I	FWS-R6-ES-2016-0042-1258	
Currently, the Grizzly bear (under review) resides in four states: Idaho, Montana, Washington and Wyoming. Within Yellowstone and Grand Teton national parks, the bears will continue to be managed by the National Park Service. However, as that only represents half of Grizzly bear territory, a large number of the bears are at risk. With delisting, the bears' habitat range will be modified into an unsafe territory. This will cause dispersal, higher levels of bear aggression, and more frequent human- bear encounters.						Factor C	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	

The main predator and reason for listing the Grizzly bear on the ESA is the human. Unfortunately, even with the ~~recovered~~ population, or rising numbers of bears, researchers in the Montana state Grizzly bear proposal agree that the grizzlies still have ~~low~~ reproductive rates and that grizzly populations are very susceptible to human impacts~~They continue to say that actual population numbers are almost impossible to detect, and they use population estimates instead. With these facts, how is it feasible to restart trophy sport hunting of the grizzlies? Especially if an increase in human-bear encounters has been shown to increase bear aggression toward people.~~						Factor C	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	
I DO NOT SUPPORT DELISTING the grizzly or the Yellowstone Draft Plan due to the lack of protection offered to the great Grizzly Bear. These bears need to travel to find mates. How can this species not only survive, but thrive, when their gene pool is so isolated? They need to be able to travel to find mates who offer gene diversity without the threat of hunters, habitat loss, or disgruntled ranchers. These bears should be able to expand their territory to sustain their species without human threat.						Factor C	I am a proud American and value what makes this country unique, including our land and wildlife. After hearing of the debate about Grizzly Bear delisting, not only was I disappointed, but angry. Angry because, once again, it seems those who are paid by American citizens to manage and protect our countries treasures are bowing to some wealthy political lobbyists. We have torn down forests, paved over habitat, wiped out entire species, and built our capitalist shrines throughout this nation. It is past time to reign in our greed and arrogance. It is time to take pride in this country's life. Delisting will only bring hunts... And hunts contributed to the grizzly numbers dropping to less than 200 in the 70s. I DO NOT SUPPORT DELISTING the grizzly or the Yellowstone Draft Plan due to the lack of protection offered to the great Grizzly Bear. These bears need to travel to find mates. How can this species not only survive, but thrive, when their gene pool is so isolated? They need to be able to travel to find mates who offer gene diversity without the threat of hunters, habitat loss, or disgruntled ranchers. These bears should be able to expand their territory to sustain their species without human threat. These ranchers need to man up... Stop blaming the bear and wolves for trying to survive on what little land we've left for them. Ranchers are the intruders. They need to take more precautions before taking out their rifles on my land. This is PUBLIC LAND PAID FOR BY TAXPAYERS and most of us want the wildlife to stay in tact. Also, the plan talks about waiting for THREE years of lowered bear population before action is taken. With what I know about the difficult and slow reproductive rates of these bears, I consider THREE years too long without a response by a management team. After all, it took grizzly bears 40 years to raise their numbers to only about 700. While the plan does not mention an intended grizzly hunt, I can only guess it's impending. I do not support a hunt at this time especially in or AROUND Yellowstone. And definitely not in any area that interrupts the bears' passage to find mates. And if you allow hunts, how will hunters differentiate between males and mothers with cubs that depend on her for survival? Or will they even care? Starving, motherless cubs is not acceptable. This plan is no plan without addressing these points. Please consider my words while remembering the dire state of the worlds wildlife. Be part of the solution. With deep concern, Ang Sutton	FWS-R6-ES-2016-0042-1373	
These ranchers need to man up... Stop blaming the bear and wolves for trying to survive on what little land we've left for them. Ranchers are the intruders. They need to take more precautions before taking out their rifles on my land. This is PUBLIC LAND PAID FOR BY TAXPAYERS and most of us want the wildlife to stay in tact.						Factor C	I am a proud American and value what makes this country unique, including our land and wildlife. After hearing of the debate about Grizzly Bear delisting, not only was I disappointed, but angry. Angry because, once again, it seems those who are paid by American citizens to manage and protect our countries treasures are bowing to some wealthy political lobbyists. We have torn down forests, paved over habitat, wiped out entire species, and built our capitalist shrines throughout this nation. It is past time to reign in our greed and arrogance. It is time to take pride in this country's life. Delisting will only bring hunts... And hunts contributed to the grizzly numbers dropping to less than 200 in the 70s. I DO NOT SUPPORT DELISTING the grizzly or the Yellowstone Draft Plan due to the lack of protection offered to the great Grizzly Bear. These bears need to travel to find mates. How can this species not only survive, but thrive, when their gene pool is so isolated? They need to be able to travel to find mates who offer gene diversity without the threat of hunters, habitat loss, or disgruntled ranchers. These bears should be able to expand their territory to sustain their species without human threat. These ranchers need to man up... Stop blaming the bear and wolves for trying to survive on what little land we've left for them. Ranchers are the intruders. They need to take more precautions before taking out their rifles on my land. This is PUBLIC LAND PAID FOR BY TAXPAYERS and most of us want the wildlife to stay in tact. Also, the plan talks about waiting for THREE years of lowered bear population before action is taken. With what I know about the difficult and slow reproductive rates of these bears, I consider THREE years too long without a response by a management team. After all, it took grizzly bears 40 years to raise their numbers to only about 700. While the plan does not mention an intended grizzly hunt, I can only guess it's impending. I do not support a hunt at this time especially in or AROUND Yellowstone. And definitely not in any area that interrupts the bears' passage to find mates. And if you allow hunts, how will hunters differentiate between males and mothers with cubs that depend on her for survival? Or will they even care? Starving, motherless cubs is not acceptable. This plan is no plan without addressing these points. Please consider my words while remembering the dire state of the worlds wildlife. Be part of the solution. With deep concern, Ang Sutton	FWS-R6-ES-2016-0042-1373	

Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population.						Factor C	There are many reasons I feel that this rule should not be passed, below are the most important ones to me. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. These states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. Every animal on this planet was put here by GOD and DESERVES to be here. Granted not everyone cares about this but remember animals have been here as long if not longer than humans. They are not destroying this planet humans ARE - BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. Many people are so obsessed with KILLING that they don't care about what they are doing to the future of this planet or what kind of world the future generations are going to be left with. - MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. I am tired of the MAJORITY desire of this country being thrown aside.	FWS-R6-ES-2016-0042-1415	
While the plan does not mention an intended grizzly hunt, I can only guess it's impending. I do not support a hunt at this time especially in or AROUND Yellowstone. And definitely not in any area that interrupts the bears' passage to find mates. And if you allow hunts, how will hunters differentiate between males and mothers with cubs that depend on her for survival? Or will they even care? Starving, motherless cubs is not acceptable. This plan is no plan without addressing these points.						Factor C	I am a proud American and value what makes this country unique, including our land and wildlife. After hearing of the debate about Grizzly Bear delisting, not only was I disappointed, but angry. Angry because, once again, it seems those who are paid by American citizens to manage and protect our countries treasures are bowing to some wealthy political lobbyists. We have torn down forests, paved over habitat, wiped out entire species, and built our capitalist shrines throughout this nation. It is past time to reign in our greed and arrogance. It is time to take pride in this country's life. Delisting will only bring hunts... And hunts contributed to the grizzly numbers dropping to less than 200 in the 70s. I DO NOT SUPPORT DELISTING the grizzly or the Yellowstone Draft Plan due to the lack of protection offered to the great Grizzly Bear. These bears need to travel to find mates. How can this species not only survive, but thrive, when their gene pool is so isolated? They need to be able to travel to find mates who offer gene diversity without the threat of hunters, habitat loss, or disgruntled ranchers. These bears should be able to expand their territory to sustain their species without human threat. These ranchers need to man up... Stop blaming the bear and wolves for trying to survive on what little land we've left for them. Ranchers are the intruders. They need to take more precautions before taking out their rifles on my land. This is PUBLIC LAND PAID FOR BY TAXPAYERS and most of us want the wildlife to stay in tact. Also, the plan talks about waiting for THREE years of lowered bear population before action is taken. With what I know about the difficult and slow reproductive rates of these bears, I consider THREE years too long without a response by a management team. After all, it took grizzly bears 40 years to raise their numbers to only about 700. While the plan does not mention an intended grizzly hunt, I can only guess it's impending. I do not support a hunt at this time especially in or AROUND Yellowstone. And definitely not in any area that interrupts the bears' passage to find mates. And if you allow hunts, how will hunters differentiate between males and mothers with cubs that depend on her for survival? Or will they even care? Starving, motherless cubs is not acceptable. This plan is no plan without addressing these points. Please consider my words while remembering the dire state of the world's wildlife. Be part of the solution. With deep concern, Ang Sutton	FWS-R6-ES-2016-0042-1373	

Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned.						Factor C	Grizzly bears in the Greater Yellowstone Ecosystem have benefited greatly from ESA protections but are not even close to fully recovered in the area, and are very vulnerable. It has taken 40 years of protections to get the population where it is. Losing ESA protections means they would be immediately hunted. Grizzly hunters, which would set population numbers in an immediate decline. The USFWS proposal to delist the grizzly not only puts a stop to this recovery, it will quickly QUICKLY reverse it. This would turn management of this iconic species over to the states and subject these animals to trophy hunting seasons in Montana, Idaho and Wyoming. Removing federal protections from this one small, isolated population and immediately hunting them will likely start an immediate decline back towards extinction. We do not recover species from the ESA, to delist and immediately begin hunting them. This is not the intention of the Endangered Species Act. The ESA is not a game farm plan. The purpose of the ESA is to protect and recover imperiled species and the ecosystems upon which they depend. It was designed to protect critically imperiled species from extinction as a "consequence of economic growth and development untempered by adequate concern and conservation." The U.S. Supreme Court found that "the plain intent of Congress in enacting" the ESA "was to halt and reverse the trend toward species extinction, whatever the cost. To delist species, several factors are considered: the threats are eliminated or controlled, population size and growth, and the stability of habitat quality and quantity. The threats are not eliminated nor controlled, but greater than ever. Habitat quality and quantity are currently unstable, and further unsustainable if delisted. The direct and indirect threats to the grizzly are enormous. The loss of key food sources due to climate change, slow reproductive rates, and the fact that the state plans to "manage" and "reduce" numbers through trophy hunts guarantee an unsustainable future for the species. The American public overwhelmingly wants grizzly bears protected for future generations, not killed by a few trophy hunters. Grizzly bears are a wildlife icon that have been a part of the American West and been integral to the Yellowstone region for centuries. Each year, visitors spend millions in the region, hoping to catch a glimpse of a grizzly, this beautiful and powerful symbol of our wild heritage. And as an apex predator, their presence is crucial to the health of wildlife in the Greater Yellowstone region. If the delisting goes through, the very state of Wyoming, Montana, and	FWS-R6-ES-2016-0042-1424	
Directly after removal from protections, in 2008, Grizzlies died in record numbers, there were virtually no penalties for killing them. Bear management had been turned over to fish and game agencies of Wyoming, Idaho and Montana who more than welcome the opportunity to kill a Grizzly bear whose life was made less valuable by delisting. Some 54 grizzly bears including 37 shot by humans were known to have died that year, the highest mortality ever recorded! Exceeding the extensive killings of 40 years ago when Yellowstone National Park closed down its garbage dumps leaving the bears to search for food sources in towns and campgrounds.						Factor C	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530	
Bear mortality is increasing due to poaching, sport hunting, train and vehicle collisions and more. Therefore grizzlies need to remain protected both within the park and outside the park, not only for the bear itself but also for the environment.						Factor C	See attached file(s) Attachments grizzly bears	FWS-R6-ES-2016-0042-1668	
The reduction of whitebark pine seeds could be problematic as well. Post hibernation, bears require all the nutrition possible to gain their fat reserves back. As documented these whitebark pine seeds be over consumed by the bear population. Adverse effects could be an increase in death for other wild animals or possible human deaths. There are thousands of visitors to Yellowstone every day, and there may be more human-bear interactions.						Factor C	The Greater Yellowstone area should remove the grizzly bear from the federal endangered species list. According to the data shown in graphs below it is perfectly reasonable for this species to no longer require federal attention and relinquish their management to the respective states. I believe we should use proper justification of data shown in this proposed rule to influence federal and state decisions, and not let the morals of hunting that many self-described conservationists influence decisions. The grizzly bears population has hit the species carrying capacity for that area according to figure 1. As hard as many find it to allow hunting of an animal, it is wise to allow the regulated ability for locals and visitors to minimally hunt this animal increasing the maximum benefits to costs for this resource. If the bear is not allowed to be hunted there is room for future increased danger from the predator since there could be more potentially harmful human encounters since the bears will venture further off national park grounds. Reducing the numbers of bears that leave the national park ground could keep unsafe encounters to a minimum. It's important to keep in mind the surrounding ecology that would be affected by the capped capacity to the bear population. As many other commenters continually emphasize the value of the bear population, they do not take into account the complexity of wildlife habitats. Other wildlife populations will be affected by more bears. More bison, elk and moose have become part of their diet. Does this mean that the conservationist commenters value the life of a bear more than the life of other animals that could be opportunistically eaten by the bears given the chance? The reduction of whitebark pine seeds could be problematic as well. Post hibernation, bears require all the nutrition possible to gain their fat reserves back. As documented these whitebark pine seeds be over consumed by the bear population. Adverse effects could be an increase in death for other wild animals or possible human deaths. There are thousands of visitors to Yellowstone every day, and there may be more human-bear interactions. As someone who values natural habitats and enjoys visiting our nation's largest national park it is our duty to now relinquish the responsibilities to manage these valued animals to their respective states. Let the coordination between fish and wildlife divisions keep the bear at a healthy population to continue to prosper, but not at such a high population that they can do other unnecessary harm to other parts of the forests nearby.	FWS-R6-ES-2016-0042-1740	

The concept of limited poaching is introduced especially if for self defense. However, bears are not harmful creatures and many methods can be implemented to prevent these creatures from attacking the population or the properties. The Habitat Based Recovery Criteria listed within the recovery planning are not backed with much scientific evidence; instead the bears are described as "opportunistic creatures"(USF&W)						Factor C	Keep Grizzly Bears on the Endangered and Threatened Species List As well as the Grizzly Bear population has recuperated within the past few years, these numbers alone cannot guarantee aggregate protection of the species. Although many factors were taken into consideration in the proposal, two main aspects of conservation biology were forgotten: 1) the ecosystem is a synchronized whole; protecting bears would protect other species as well, especially because bears are an umbrella species to their habitats and 2) all conservation methods, though pragmatic, have no definite outcome. Grizzly Bear conservation has been dynamic and many goals were reached including raising population numbers. However, just because the population has reached a certain set number does not mean they lack vulnerabilities. One such vulnerability is climate change. The issue of climate change is addressed in the proposal with the conclusion of having little impact on the bears. Grizzly Bears used to range from Northern Canada to Northern Mexico, a vast expanse of land known to many as the "Spine of the Continent." However, Grizzly bears are also creatures of the cold and with the rise in global temperature, their comfortable habitat range will continually be expurgated Northward. Climate change has also decline snowfall in certain areas; snowfall is important to Grizzlies as they inhabit dens where snow is unlikely to melt in warmer temperatures. As noted in the proposal, many Grizzly Bear biologists within this region do not believe climate change will affect the species. Though resilient and hardy creatures, by taking them off the Endangered and Threatened Species list, we are asking them to adapt to climate change as a whole species. As noted before, Grizzly Bears are known as a keystone and umbrella species of their systematic habitats. (Berger et al 2001) Just like the Grey Wolves in Yellowstone, even their presence affects many more species including both animal and plant life forms. Using the wolves as an example in Yellowstone, when the wolves were eliminated the whole ecosystem seemed to be dying alongside. Without wolves to control the Elk populations, the Elk overpopulated and ate or trampled many plant species. Without plant species, all the other mini-ecosystems such as the riverbanks were affected negatively as well. Though bear numbers are stable at the moment, they are faced with habitual vulnerabilities such as fragmentation and poaching. As the country develops, more and more land is urbanized and deforestation is rampant. Since the foundation of our country, 90% of this forest has been cleared.	FWS-R6-ES-2016-0042-1670	
However, it also has seemed to me that these encounters are unnaturally high, and the bears have seemed desperate. I have found carcasses where one bear has killed another, and been in situations where many bears flocked to one elk carcass. It seems that the bears are a detriment to each other, and its time for them to be professionally regulated to some degree.						Factor C	As an avid user of the Greater Yellowstone area and professional land manager of the Forest Service, I fully support delisting the Grizzly Bears of the Greater Yellowstone Ecosystem's distinct population segment. Nothing is so unique as traveling in remote, primeval backcountry inhabited by grizzly bears, and I do not feel that delisting will threaten this experience. Throughout the FWS's report and specifically on page 111 it is stated that the GYE grizzly population has stabilized in growth since 2002, signaling a reach of carrying capacity. In this scenario density-dependent factors influence population growth the most. This indicates the population is recovered and at sustainable levels, a testament to the success of the ESA. The ultimate test for success is removal of a species from the ESA, and it seems that the GYE DPS is ready for this action. I have traveled much in the Thorofare region of the GYE and have had many encounters with grizzlies. I revel in these experiences, and while frightening, it makes one realize his own insignificance in the face of raw wilderness. One is forced to be better prepared, more aware, and more observant. It is a true wilderness experience that is only found in a few special places. However, it also has seemed to me that these encounters are unnaturally high, and the bears have seemed desperate. I have found carcasses where one bear has killed another, and been in situations where many bears flocked to one elk carcass. It seems that the bears are a detriment to each other, and its time for them to be professionally regulated to some degree. The debate of delisting seems to center on the proposal of Wyoming, Montana, and Idaho to implement carefully regulated hunting seasons of grizzly bears. Many critics warn of dramatic declines of numbers caused by "anti-carnivore" state agencies allowing trophy hunting. However, upon reading of the report and Conservation Strategy one will see hunting will be highly regulated based upon population wide numbers and mortality. Females with young will not be hunted, and very specific percentages of population will be available for discretionary mortality. In short, the guidelines for regulated hunting are specific under the report, starting on page 111. Moreover, it is likely that removing some males from the population will result in less inter-killings and therefore higher rates of sub-adult survival. In reality state based management has resulted in robust populations of all game species throughout the country. Revenue generated will help with continued study and management of the grizzlies. There are no indications that hunting will cause grizzly populations to dramatically decline to zero.	FWS-R6-ES-2016-0042-1802	
I OPPOSE DELISTING!! Here is why and the science behind it: THE USFWS claims that the shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival.The reality: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source."						Factor C	I OPPOSE DELISTING!! Here is why and the science behind it: THE USFWS claims that the shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. The USFWS claims there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." More science to come.	FWS-R6-ES-2016-0042-1878	

The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone.						Factor C	I OPPOSE DELISTING!! Here is why and the science behind it: THE USFWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foods is not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. The USFWS claims there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." More science to come.	FWS-R6-ES-2016-0042-1878	
Poaching is bad enough but sanctioned hunting would open doors that should remain firmly shut and locked. People have hunted many species of wild animals to extinction with dire effects on the wildlife food chains, and many more years of study are necessary before anyone can claim the loss of grizzly bears through hunting or other killing could be of any positive benefit.						Factor C	I oppose vigorously the delisting of Grizzly Bears from the Federal List of Endangered and Threatened wildlife. In no way can you ever consider Grizzly Bears to be not endangered. There can be no justification for delisting them, no benefit to anybody except trophy hunters, certainly not a benefit to wildlife in America. Grizzly Bears reproduce and replace their population slowly, and we have almost hunted them to extinction before. Poaching is bad enough but sanctioned hunting would open doors that should remain firmly shut and locked. People have hunted many species of wild animals to extinction with dire effects on the wildlife food chains, and many more years of study are necessary before anyone can claim the loss of grizzly bears through hunting or other killing could be of any positive benefit. There is positive benefit to protecting them in that they are a part of our ecosystem, history and heritage, and their place in America serves purposes in the ecosystem and food chain that cannot be measured in black and white. In summary, I OPPOSE the proposed rule and urge Fish and Wildlife to continue protecting this majestic animal along with others that are vulnerable to trophy hunting to extinction.	FWS-R6-ES-2016-0042-2349	
While grizzly bears may not have fully recovered everywhere, in this area they have more than fully recovered to the point other wildlife species are suffering due to excessive predation. Many local ranchers are also suffering from the damage the overabundance of bears is having on their livestock.						Factor C	I am in favor of removing Grizzly Bears from the list of Federal Endangered and Threatened Wildlife for the Yellowstone area. While grizzly bears may not have fully recovered everywhere, in this area they have more than fully recovered to the point other wildlife species are suffering due to excessive predation. Many local ranchers are also suffering from the damage the overabundance of bears is having on their livestock. I think grizzly bears are a magnificent creature and I'm glad they have made such a successful recovery in the area. Having said that I believe it's high time we implement some sound management practices like we do for other wildlife species. Hunting can and should be a PART of those management practices. The fact that a bear like "Scarface" can live 25 years to the point he is emaciated and nearly half his peak weight is pretty telling to me. That he felt the need to wander out of the park in search of food where he was ultimately killed also speaks to my point that the bear population in this area has recovered to a point it is causing damage to other wildlife species. I say we call their recovery in this area a success and delist the Grizzly.	FWS-R6-ES-2016-0042-2470	
Delisting the grizzly will also re-open surrounding areas within the greater Yellowstone ecosystem to new development – golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions.						Factor C	There are many compelling reasons why removing ESA protections of the grizzly is premature at best and potentially devastating to the bears recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. Delisting the grizzly will also re-open surrounding areas within the greater Yellowstone ecosystem to new development – golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival.	FWS-R6-ES-2016-0042-2744	

Human/bear interactions will increase, and bears will die.						Factor C	quoting Larry Fahn, " . . . there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. end quote I look forward to your response,	FWS-R6-ES-2016-0042-2750	
In 2015, record number of Yellowstone area grizzly bears were killed despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years.						Factor C	Object to delisting the grizzly bear from the Endangered Species Act. Barring that, the delisting does not need to be accompanied by the legalization of trophy hunting for the following reasons: AS WE SAW WITH SCARFACE, BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. In 2015, record number of Yellowstone area grizzly bears were killed despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. Additionally, there are ranchers right outside of Yellowstone (in MT) who are practicing wildlife sustainable ranching. Rather than give ranchers a license to kill, can't we first ask that they try these methods? The economic impact of grizzlies being road friendly in Yellowstone is huge. Once they start being hunted, they will become less road friendly and there will be fewer visitors to Yellowstone. IF HUNTING IS ALLOWED, THERE MUST BE BUFFER ZONES around national parks and a no-hunt zone in between Yellowstone and Grand Teton National Park, minimally, and up through the Tom Miner Basin area in Montana. CLIMATE CHANGE NEEDS TO BE CONSIDERED. Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated at least one food source. USFWS needs to consider how climate change will impact bears' food sources and behavior. USFWS failed to do this with wolverines and had to have a court order USFWS to consider climate change in wolverine listing. Additionally, we can't say that we are being environmentally responsible and kill off apex predators. The environment does not stop with the flora but is equally impacted by the fauna, particularly apex predators. MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The outcry over the killing of Cecil the Lion by many Americans will be repeated here. We cannot object to the killing of Cecil and then less than a year later sanctify the right of hunters to do the exact same thing in the U.S. STATE CONFLICTS OF INTEREST. The states have not shown that they can work together to manage their apex predator populations, and several officials of the surrounding states have indicated that	FWS-R6-ES-2016-0042-2859	
Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die.						Factor C	While their numbers have risen to more than 600 individuals, the bears are geographically isolated, and threats to their habitat and food supplies are daunting. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Removing protections always increases poaching and illegal means of luring animals to the margins of the protected areas for easy, senseless kills. Can't our nation leave the remaining wildlife unmolested, and for the public to enjoy, instead of encouraging blood sports, a relic of barbaric practices?	FWS-R6-ES-2016-0042-2901	

Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Removing protections always increases poaching and illegal means of luring animals to the margins of the protected areas for easy, senseless kills.						Factor C	While their numbers have risen to more than 600 individuals, the bears are geographically isolated, and threats to their habitat and food supplies are daunting. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Removing protections always increases poaching and illegal means of luring animals to the margins of the protected areas for easy, senseless kills. Can't our nation leave the remaining wildlife unmolested, and for the public to enjoy, instead of encouraging blood sports, a relic of barbaric practices?	FWS-R6-ES-2016-0042-2901	
First, the bears in this region are finding it increasingly difficult to find decent food resources throughout the year, on account of the effects of climate change, including phenological effects in high-elevation ecosystems, and the alarming growth in the numbers of the mountain pine beetle. Secondly, the genetic diversity of these bears is not great, so the sustainability of the population as a whole is unusually insecure; in light of that, so far from their having to deal with being left with fewer protections, their population should be strengthened by finding increased protections for reliable migration corridors connecting their region to regions to the north where other grizzlies are thriving. Thirdly, the bears' human environment was never good: human neighbors mistrust them at best, or actively go about seeking their removal; hunters covet collecting their body-parts as trophies; and local and state governments lack the political will to protect them, if they're even aware that they need protecting, and are at all sympathetic to that cause.						Factor C	The proposal to remove the Yellowstone population of grizzly bears from status as endangered or threatened should not be recommended. The criteria that the agency have been using to make that recommendation are too narrow, so that the predicament of those bears is not fully appreciated. Three considerations seem to be outstanding. First, the bears in this region are finding it increasingly difficult to find decent food resources throughout the year, on account of the effects of climate change, including phenological effects in high-elevation ecosystems, and the alarming growth in the numbers of the mountain pine beetle. Secondly, the genetic diversity of these bears is not great, so the sustainability of the population as a whole is unusually insecure; in light of that, so far from their having to deal with being left with fewer protections, their population should be strengthened by finding increased protections for reliable migration corridors connecting their region to regions to the north where other grizzlies are thriving. Thirdly, the bears' human environment was never good: human neighbors mistrust them at best, or actively go about seeking their removal; hunters covet collecting their body-parts as trophies; and local and state governments lack the political will to protect them, if they're even aware that they need protecting, and are at all sympathetic to that cause. With regard to that third consideration more generally, it is not clear that the agency take full account of the human environment of wild animals when they assign them a regulatory survival status. It's very fair for us to think of the situation of another species of mistrusted predator in the midst of hostile human neighbors, the re-introduced "Mexican" gray wolves of southern Arizona and New Mexico, a situation that has been poorly regulated and maintained and as a result remains highly insecure, especially because of failures to appreciate the behavior of human beings. Those of us who hope for a strong and resilient population of grizzlies in the Yellowstone region, secure in their home and well-connected to other populations of their kind, dread the thought that they may be left in a predicament not unlike that of the Mexican wolves, with no human friends to help them secure their future, but rather having to rely on the tender mercies of neighbors who neither understand them nor sympathize with them nor even so much as like them.	FWS-R6-ES-2016-0042-2964	
This includes changes in land use as a result of the delisting including: hunting, change sin land uses, logging, increased accidental and poaching of bears, reduced penalties for illegal kills that could lead to greater bear deaths, reduced breeding due to bear removal, greater stress on the bears that reduces reproduction, killing of sows and rleated reduction in reproduction and cumulative effects of climate change and increased resource extraction as a result of a decision to deliast.						Factor C	Please, do not delist the Greater Yellowstone population of grizzlies from the Edangered Species list. The affects of this decision need to be analyzed for all likely forseeable direct, indirect and cumulative effects on the species. This includes changes in land use as a result of the delisting including: hunting, change sin land uses, logging, increased accidental and poaching of bears, reduced penalties for illegal kills that could lead to greater bear deaths, reduced breeding due to bear removal, greater stress on the bears that reduces reproduction, killing of sows and rleated reduction in reproduction and cumulative effects of climate change and increased resource extraction as a result of a decision to deliast. There needs to be a complete analysis of all effects as a result of the delisting. I urge you to no delist at this time, as there are many effects that need to evaluated and in the case of climate chage it is a likely forseeable effec taht will result in reduced habitat quality and quantity, changes in habitat spatial arrangement that could affect the speices and reduced habitat quality due to greater resource extraction in areas that are now critical habitat for bear recovery. I will talk to you in any format, you can call me at 509 6303594 ir wrute ne at 200 S. kent Place East Wenatchee, Wa. 98802. Sincerely Kevin Kane	FWS-R6-ES-2016-0042-3036	

When bears and humans start having conflicts in developed areas I think we have a problem. I'm not saying bears will never be around humans, but when they are causing problems and government agencies are constantly moving, trapping, or killing bears this should be a red flag. There is a grizzly bear recovery zone set aside just for them. The bears are now well past those boundaries and expanding quickly. There is no reason to say they have not recovered and no longer need protection especially when the population has exceeded the target 500 bear goal by almost double.						Factor C	I support delisting the grizzly bear. As a wildlife biology and management major, I understand the importance of carrying capacity in wildlife. It is important that we manage the bears rather than letting their numbers run loose so that the population doesn't increase too much. Therefore we should be able to determine a reasonable population of bears and hunt them to keep them there. The grizzlies are at the top of the food chain, besides humans, so they aren't going to be in danger from other animals. They are in danger from themselves because if there is too high of a population they will start depleting all of the resources. Hunting is not something that should be taken away from us, so we need to share the available prey with them. Having too many top predators would reduce our ability to hunt because there will be smaller populations of prey. To keep the prey, such as elk, at optimal population numbers you would reduce our right rather than reducing the amount of bears. I think this is wrong. Yes we should have predators, but we shouldn't allow them to over populate. Right now, my step father lives in Wapiti, Wyoming, which most people know is on the main route the the east entrance of Yellowstone. Wapiti is highly colonized by people, and grizzlies share that habitat too. In the past several years, grizzlies have become more and more of a problem with the people living here. There is numerous amounts of wilderness lands around Yellowstone that should allow the bears to live comfortably. When bears and humans start having conflicts in developed areas I think we have a problem. I'm not saying bears will never be around humans, but when they are causing problems and government agencies are constantly moving, trapping, or killing bears this should be a red flag. There is a grizzly bear recovery zone set aside just for them. The bears are now well past those boundaries and expanding quickly. There is no reason to say they have not recovered and no longer need protection especially when the population has exceeded the target 500 bear goal by almost double. I grew up hunting, fishing, and camping on horses in the wilderness of Shoshone National Forest, and I have been face to face with grizzly bears. Those who want to protect them should have to go into an elk camp in September in the Thorofare and stay there for the month. After that experience, then I will listen to what they have to say. Every outfitter knows the struggles of the grizzlies in their camps, around their horses, clients, and carcasses. Bear advocates want to group outfitters as bear haters, but if they lived in the outfitter's shoes for a year, they might think	FWS-R6-ES-2016-0042-3160	
Bear advocates want to group outfitters as bear haters, but if they lived in the outfitter's shoes for a year, they might think differently too. Not to say they are bear haters, it's just another problem to stack onto their extremely high daily load of duties. Simultaneously, every once in a while there is a habituated grizzly bear that causes a problem, charges, or endangers someone's life in the backcountry. These bears should not be given more than one chance, but with them protected it causes many problems with anyone who shoots one in self defense. When a person is in a life threatening situation, they shouldn't have to hope they will not get accused of shooting an endangered species purposefully and fear the consequences that come with it. If grizzlies were delisted, needing to shoot a bear would result in simpler actions.						Factor C	I support delisting the grizzly bear. As a wildlife biology and management major, I understand the importance of carrying capacity in wildlife. It is important that we manage the bears rather than letting their numbers run loose so that the population doesn't increase too much. Therefore we should be able to determine a reasonable population of bears and hunt them to keep them there. The grizzlies are at the top of the food chain, besides humans, so they aren't going to be in danger from other animals. They are in danger from themselves because if there is too high of a population they will start depleting all of the resources. Hunting is not something that should be taken away from us, so we need to share the available prey with them. Having too many top predators would reduce our ability to hunt because there will be smaller populations of prey. To keep the prey, such as elk, at optimal population numbers you would reduce our right rather than reducing the amount of bears. I think this is wrong. Yes we should have predators, but we shouldn't allow them to over populate. Right now, my step father lives in Wapiti, Wyoming, which most people know is on the main route the the east entrance of Yellowstone. Wapiti is highly colonized by people, and grizzlies share that habitat too. In the past several years, grizzlies have become more and more of a problem with the people living here. There is numerous amounts of wilderness lands around Yellowstone that should allow the bears to live comfortably. When bears and humans start having conflicts in developed areas I think we have a problem. I'm not saying bears will never be around humans, but when they are causing problems and government agencies are constantly moving, trapping, or killing bears this should be a red flag. There is a grizzly bear recovery zone set aside just for them. The bears are now well past those boundaries and expanding quickly. There is no reason to say they have not recovered and no longer need protection especially when the population has exceeded the target 500 bear goal by almost double. I grew up hunting, fishing, and camping on horses in the wilderness of Shoshone National Forest, and I have been face to face with grizzly bears. Those who want to protect them should have to go into an elk camp in September in the Thorofare and stay there for the month. After that experience, then I will listen to what they have to say. Every outfitter knows the struggles of the grizzlies in their camps, around their horses, clients, and carcasses. Bear advocates want to group outfitters as bear haters, but if they lived in the outfitter's shoes for a year, they might think	FWS-R6-ES-2016-0042-3160	

GRIZZLY BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. There is a poaching problem, a record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population of The Iconic Grizzly.						Factor C	I completely OPPOSE delisting Yellowstone Grizzlies. For lots of reasons but these are the main ones, - DECLINING FOOD SOURCES: Historically bears dependent on 4 food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - STATE MANAGEMENT JEOPARDIZES THE GRIZZLIES SURVIVAL. Many states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. - MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - GRIZZLY BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. There is a poaching problem, a record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population of The Iconic Grizzly.	FWS-R6-ES-2016-0042-3243	
But current plans to delist grizzlies fail to recognize continued threats to what remains a small, fragile population. Crucial food sources have been lost to climate change, putting the bears under stress. Fewer cubs are living to adulthood. Human-bear encounters are increasing as bears range further in search of food, placing the bears in lethal peril. Even with ESA protections, the grizzly population has been static for over a decade. Without those protections, experts project that grizzly numbers will fall.						Factor C	See Attached Attachments Regele Susan	FWS-R6-ES-2016-0042-3272	
We cannot let human behavior and stupidity jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary x nuisances. Å						Factor C	Do not remove protections from the Yellowstone grizzly bear! We cannot let human behavior and stupidity jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances.	FWS-R6-ES-2016-0042-3329	
Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures.						Factor C	The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, digging for grubs and hunting prey. Seeing a grizzly bear in the wild is usually an experience that remains with you for life. The Endangered Species Act has helped bring the grizzly bear back from the brink of extinction. The bears in the greater Yellowstone ecosystem need its help, and yours, to continue on their road to recovery. There are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bear, federal, state and local governments should be looking for ways to	FWS-R6-ES-2016-0042-3349	
Please do not delist the Grizzly Bears and hand over their lives to states which management which manages by hunting. The population has grown less than 19 bears a year: Do the math. A population of 150 bears were put under the ESA 41 years ago and we only have 750 bears which are already subject to being put down for cattle deaths and humans interactions. That is less than 20 bears a year. So many more will be killed if they are delisted.						Factor C	Please do not delist the Grizzly Bears and hand over their lives to states which management which manages by hunting. The population has grown less than 19 bears a year: Do the math. A population of 150 bears were put under the ESA 41 years ago and we only have 750 bears which are already subject to being put down for cattle deaths and humans interactions. That is less than 20 bears a year. So many more will be killed if they are delisted. I say again: Do the math, apply the science. Keep Grizzly Bears listed.	FWS-R6-ES-2016-0042-3415	

Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. Å						Factor C	We must immediately stop the U.S. Fish and Wildlife Service (USFWS) from removing the grizzly bear in the Greater Yellowstone Ecosystem Montana, Idaho and Wyoming from the Federal Lists of Endangered and Threatened Wildlife. They must not delist the Yellowstone grizzly bear.. Critics of the USFWS proposal say that lifting protections for the bear could endanger a growing population, and a lot of the US Public believe that also. The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to an estimated 700 or more today. But grizzly bears have all but disappeared from almost all of the continental United States, except for Yellowstone and Glacier National Park and a few other slivers of habitat, the New York Times reported May 3. After all I have read I wonder! if the delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that I sternly oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. We cannot let humans jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. I also read that the author of the report that led to the delisting proposal, Dr. Christopher Servheen, grizzly bear recovery coordinator, U.S. Fish and Wildlife Service, admits private land development is the greatest threat to the nation's grizzlies, as further development could cut off connectivity among populations and disrupt vital habitat. Please do what is right and scientifically backed and don't delist the grizzly bear because it would be the beginning of the end for them. Thank you for your time and consideration on this very important issue.	FWS-R6-ES-2016-0042-3441	
Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years, caused by ignorant planning by humans, by the way..						Factor C	I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters. Yellowstone was almost destroyed with this insane and uneducated war on wolves and now (do we learn nothing??) the same is happening with the Grizzly Bears. It is mind boggling. Please consider that: Everything in your power should be done to protect this amazing mammal. FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Declining food sources pose a threat to Grizzlies and this delisting will be devastating to the Grizzly's chance of survival.. Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Another natural curb in their number. Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains Grizzlies occupy only 1% of their historic range. AND PLEASE TAKE NOTE: Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years, caused by ignorant planning by humans, by the way.. Hoping for some forward thinking and moral courage here! Thank you Anne K	FWS-R6-ES-2016-0042-3905	

Grizzlies may be "generalists" when it comes to food supplies, but it is difficult to understand how you can dismiss the major dropoff in two of the GYE grizzly food sources, whitebark pine nuts and cutthroat trout, with a third major food source, cutworm moths, at high risk from the prospective drop in their availability with the introduction of GMO crops tailored to kill them in the fields where they spend most of their time. Only meat is left to the bears, along with minor food sources like forbs and grubs. And we all know the connection between meat carcasses and human interaction - whether with hunters, crossing roads or around ranchlands. It does not bode well for grizzlies. At a minimum, it seems that the diminishment of major food sources in the GYE should lead to a fuller consideration that the carrying capacity of the land has been reduced and the bears are ranging farther from their traditional territories in search of adequate diet replacements and this has not been fully evaluated in the Rule.						Factor C	Grizzlies may be "generalists" when it comes to food supplies, but it is difficult to understand how you can dismiss the major dropoff in two of the GYE grizzly food sources, whitebark pine nuts and cutthroat trout, with a third major food source, cutworm moths, at high risk from the prospective drop in their availability with the introduction of GMO crops tailored to kill them in the fields where they spend most of their time. Only meat is left to the bears, along with minor food sources like forbs and grubs. And we all know the connection between meat carcasses and human interaction - whether with hunters, crossing roads or around ranchlands. It does not bode well for grizzlies. At a minimum, it seems that the diminishment of major food sources in the GYE should lead to a fuller consideration that the carrying capacity of the land has been reduced and the bears are ranging farther from their traditional territories in search of adequate diet replacements and this has not been fully evaluated in the Rule. It also does not appear to be "best science" as required by law to dismiss predictions of habitat changes that will directly affect grizzly bears without a fuller exploration of this issue than is contained in the proposed Rule. I understand that taxpayer funded data that you use has not been made available to the greater scientific community or independent scientists for review before a decision is made final on an action that is still open to much disagreement. I live in the Paradise Valley north of YNP and listen and talk to scientists who are working on these issues and it does appear that, in fact, there is hard evidence available showing that the isolated grizzly bear population growth rate is flat, if not declining, for more than 10 years. For an animal in recovery with the slowest reproductive rate of any North American mammal, still today occupying only 2% of their historic habitat (and are you allowed under case law to delist isolated segments of a population listed as a single entity under the ESA? I do not think so!), and with a mortality rate of 10% in 2015, it appears to me that the Rule now open to comment is sorely lacking the kind of high level and THOROUGH analysis addressing these issues and more that is deserved by this iconic creature. Too much is at stake. Please consider re-opening your review and include a panel of independent, qualified scientists who are working separately from current grizzly research in the GYE.	FWS-R6-ES-2016-0042-4277	
During years of low productivity of high calorie foods for bears, bears will be more apt to move further in search of food. Whitebark pine nut seed availability can be a leading factor in calorie intake for grizzly bears in the fall. If bears move lower in elevation to search for food, human conflicts may very well increase in these years (Turnbull 2015). There should be an amendment for low productive years that would increase the quotas for harvest due to accidental mortalities of bears. The current population of grizzlies is well above the recovery requirement so fluctuations in harvest quotas would not have a large negative impact. In low productivity years, the total mortalities could be increased by 25 percent in order to lower natural deaths within the population and allow for harvest to occur. Grizzly bear health would be benefited within individuals and the population. Monitoring of grizzly bear food sources will need to continue to ensure the study of the population will remain ideal.						Factor C	The notion of delisting grizzly bears (<i>Ursus arctos horribilis</i>) from the Endangered Species List has been important to concerned Wyoming residents for quite some time now. I grew up in Cody, Wyoming where I have hunted, fished and travelled horseback through most of the Shoshone National Forest and Absaroka Wilderness. As a hunter and conservationist, I have personally witnessed part of the recovery of this species and believe that the population has recovered and this proposed rule should be made final. This docket was prepared in regards to the growing population of grizzly bears in the Greater Yellowstone Ecosystem (GYE). In compliance with the National Environmental Policy Act (NEPA), this statement is in the proposed rule for public comment (42 USC 4321-4370 1969). Livestock and human conflicts have been increasing every year (WGFD 2015). The planning within this document provides adequate data to prove that grizzlies have recovered and are at their carrying capacity for the Greater Yellowstone Ecosystem. With help from State and Tribal agencies and the Interagency Grizzly Bear Study Team (IGBST), the USFWS has shown that grizzlies can be delisted (42 USC 4321-4370 1969) and should be managed by State and Tribal governments. In accordance to the population ecology background, density-dependent and density-independent factors can regulate a population size (42 USC 4321-4370 1969). Intraspecific killing has been occurring as a density-dependent factor within the population; two bears were killed by other bears in 2014 (IGBST 2014). There has been an increase in home range-size as the species population grows, bears have to travel further to obtain food. The research accomplished by the IGBST has easily made the GYE grizzly bear population the most studied North American species (IGBST 2014). Grizzly bears will continue to be monitored and managed but with more authority from State and Tribal agencies. Concerns of Factor A The six recovery ecosystems of bear populations are an acceptable way to monitor the total population. However, with the movement of individual bears, it may be hard to identify total state populations at a given time (WGFD 2016). Yes, some of these bears are collared by state agencies but from experience, not every bear can and will be collared (Turnbull 2015). If the allowable number of total mortalities for independent females cannot exceed 7.6%, 15% for independent males and 7.6% for dependent young, each states harvest quota for mortality will have to continually change during the harvest season. Quotas should be established at the beginning of a hunting season and	FWS-R6-ES-2016-0042-4361	
Removing Grizzly bears in the Yellowstone area is a really, really bad idea. It has taken years to build up the population to the point that it may be self sustaining, even with all the threats that these important contributors to the ecological health of the Yellowstone system face, and will continue to face with the fact that the Yellowstone ecosystem is incomplete, having been established before there was an understanding of what constitutes an ecosystem. Just don't do it!						Factor C	Removing Grizzly bears in the Yellowstone area is a really, really bad idea. It has taken years to build up the population to the point that it may be self sustaining, even with all the threats that these important contributors to the ecological health of the Yellowstone system face, and will continue to face with the fact that the Yellowstone ecosystem is incomplete, having been established before there was an understanding of what constitutes an ecosystem. Just don't do it!	FWS-R6-ES-2016-0042-0153	
Would we expect that 700 beings of a race would allow for diversity for breeding? Absolutely not. This will lead to a virus wiping out the meager Grizzly population						Factor C	I live in Montana and enjoy the wild of my state. There simply isn't enough of a gene pool to secure the Grizzly population. Would we expect that 700 beings of a race would allow for diversity for breeding? Absolutely not. This will lead to a virus wiping out the meager Grizzly population. It makes sense to grow the population and allow them to go back to their original habitat through out the States. For instance, there are literally no bears in the Black Hills of South Dakota. They have all been hunted. The precedence set with the Grizzlies will affect how all bear and wildlife conservation will look going forward. We need to get this right. Let the population grow.	FWS-R6-ES-2016-0042-0009	

Delisting grizzly bears seems to be based on sound science. However, habitat loss, conflicts with humans, and climate change remain concerns for grizzly bear populations into the future. The state agencies dismiss these concerns by proposing hunting seasons immediately upon a delisting ruling and the states have not acknowledged that recovery of any species occurs along a gradient.						Factor C	The real issue in this situation is that the public does not trust state agencies to manage grizzly bear populations with regard to all stakeholders. With a reputation for bowing to the hunting and ranching communities, the state agencies of MT, WY, and ID have not proven that they can manage wildlife in any manner other than establishing trophy hunting seasons immediately upon delisting in order to satisfy a small proportion of the state's citizens. These plans often involve target population numbers based on federal recovery goals, which should be considered minimums, and in no state is the plan to increase grizzly population numbers or increase habitat quality and acreage or decrease habitat fragmentation. Including areas of continued recovery (e.g., increasing grizzly habitat and population numbers) should be required for each state management plan in order for the federal government to consider delisting. One only has to consider the delisting of the gray wolf in these states to realize the strange partnership between the state agencies and the hunting and ranching communities. Many stakeholders are involved and concerned with state wildlife management and currently state agencies do not seem to realize this in any way. Delisting grizzly bears seems to be based on sound science. However, habitat loss, conflicts with humans, and climate change remain concerns for grizzly bear populations into the future. The state agencies dismiss these concerns by proposing hunting seasons immediately upon a delisting ruling and the states have not acknowledged that recovery of any species occurs along a gradient. A conservative state management approach would consider future impacts to a long-lived species with slow reproduction and also consider the values of the non-hunting and ranching stakeholders. Unless state agencies can prove to the public that the opinions of all of their citizens are being considered, issues related to the Endangered Species Act, both listing and delisting will persist. The only way this can be mitigated for the grizzly bear is to deny delisting until the state management plans are written in a way that promotes grizzly populations while considering future human-caused changes to the ecosystem and also the opinions and values of all stakeholders weighted to their prevalence in their home state.	FWS-R6-ES-2016-0042-5015	
Additionally, management by the states is now needed as bears are becoming more and more bold as they have an UNNATURAL lack of fear/respect for humans.						Factor C	I support delisting grizzly bears in the GYE. Let the biologists do their job and take the emotional nonsense out of this quagmire. The scientists have said the populations are stable/recovered. Additionally, management by the states is now needed as bears are becoming more and more bold as they have an UNNATURAL lack of fear/respect for humans.	FWS-R6-ES-2016-0042-0145	
The griz have been protected for so long that they are not afraid of anything/anyone.						Factor C	We are avid outdoors people who are in the back woods/high country at least 3 or more times per week. We frequently encounter grizzlies, they are FAR from endangered!! It is long overdue that this species is delisted and let the state fish and game control the grizzly hunts and numbers. The griz have been protected for so long that they are not afraid of anything/anyone.	FWS-R6-ES-2016-0042-0166	
The final answer as to why the Yellowstone Grizzly should not be removed is clearly because the species is not recovered. Instead of delisting, with all the time, money, and effort spent to bring back the bear from extinction, more money and time needs to be spent educating the growing human population on living in bear territory. Currently, the #1 cause of bear mortality still stems from conflicts with people.						Factor C	To Secretary of the Interior Mrs. Sally Jewell, I am writing to you about the issue of the U.S. Fish and Game Department's decision to remove the Yellowstone Grizzly Bear aka Brown Bear off the Federal Endangered Species Protection list. This is a complex issue as are the consequences of this amazing animal losing their endangered protection. The final answer as to why the Yellowstone Grizzly should not be removed is clearly because the species is not recovered. Instead of delisting, with all the time, money, and effort spent to bring back the bear from extinction, more money and time needs to be spent educating the growing human population on living in bear territory. Currently, the #1 cause of bear mortality still stems from conflicts with people. A secondary unforeseen problem that has reared its ugly head in recent years is the misinformation campaign of certain US agencies as well as one sided mainstream media stories. For example, government agencies and U.S. newspaper articles have claimed that the Yellowstone Bear population has increased and even doubled since the last time the US Fish and Game tried to remove the bear in 2006. In dissent of this opinion, a recent annual report compiled by Dr. David Mattson from the Interagency Grizzly Bear Study Team concludes that the Yellowstone Grizzly population has not only not grown since 2002, it has actually declined since 2007. This effort to misinform the public is both disturbing and problematic because the American people are not getting the truth. Let it be known that I wish to only focus on a few important points in this letter as opposed to the many reasons as to why delisting the Yellowstone Bear is the wrong move at this time. Female bears if healthy only have litters about every 3 years and do not reproduce easily. The Yellowstone Bear population has been isolated for over 100 years and some evidence suggests that the population is suffering from the effects of inbreeding. The Brown Bear currently occupies about 1% of their historic range prior to Europeans settling the United States. While there is available habitat suitable for Brown Bears that could be used to connect the few remaining populations in the lower 48 states, the current plan calls for flying or driving male brown bears to Yellowstone in order to mate and improve their genetic diversity. Again, this is a wrong-headed move unless given no other choice to sustain a healthy population. Currently, ranchers and farmers are compensated for the loss of domesticated animals by Yellowstone Bears. While some ranchers are working out their differences peacefully with grizzly bears, others are not. For that reason	FWS-R6-ES-2016-0042-0008	

Grizzly bear and human conflicts will be reduced due to the bears will begin to see humans as a potential threat again. At this time, the bears have no threats, and are becoming accustomed as such.						Factor C	It is time to remove the Grizzly Bear from the Endangered Species List. The bear is successfully recovered, and should now be managed by the state agencies, which have successfully recovered many other species. Grizzly bear and human conflicts will be reduced due to the bears will begin to see humans as a potential threat again. At this time, the bears have no threats, and are becoming accustomed as such. This can also bring some revenue to the state agencies, which are currently only spending revenue dealing with the problem bears. I for one, am a fan of the bears, and look forward to viewing them. Allowing state management of the animal will allow the state to manage the bear for what is best for the bear. Currently, with this being under federal protection, the bear is being managed under assumptions at the national level, and not by those who care for the bears themselves. I fully support the delisting of this animal.	FWS-R6-ES-2016-0042-0192	
I have talked to many outfitters over the years about grizzly bears and hunting them. Each person who has had a lot of experience in an area with good grizzly bear populations has said that hunting these animals also helps to keep them wild. They find that they have less problems with the bears being bad in locations where they are hunted.						Factor C	It is time that we allow very limited permit hunting of these majestic animals. Their populations warrant it and I believe that the professional wildlife biologists and the folks that know and study these great animals know a heck of a lot more than the average person. They all feel that it is time to help control the populations of these animals. The states in conjunction with working with biologists should be the ones who set the numbers of animals that can or will be taken. Hunting would also be a very useful tool that could be used when a problem bear needs to be dealt with instead of paying biologists or others thousands of dollars to deal with a problem animal. If populations drop and don't hold steady at a sustainable level then hunting would stop in that area until they again were at good healthy levels. Each area where the bears would be hunted, and each state needs to closely monitor the populations and respond accordingly. I have talked to many outfitters over the years about grizzly bears and hunting them. Each person who has had a lot of experience in an area with good grizzly bear populations has said that hunting these animals also helps to keep them wild. They find that they have less problems with the bears being bad in locations where they are hunted. I completely support limited permit hunting and sportsman and women should be proud of the fact that our dollars and the work by groups such as Game & Fish Departments, Safari Club International, Rocky Mountain Elk Foundation, and the Boone & Crockett Club have worked hard to help keep Grizzly Bears for all of us to enjoy and see. It is sportsman's dollars and visions that is the largest contributor to the success of bringing these great bear populations back to where they are today.	FWS-R6-ES-2016-0042-0179	
Based on current grizzly populations and the extremely high incidence of conflict with humans in the Island Park area and elsewhere, it would be irresponsible to not start big game management of these animals. Controlled hunting has been shown to be the most effective way to manage wildlife populations and it would instill a natural fear of humans in these predators that is missing to some extent now.						Factor C	Based on current grizzly populations and the extremely high incidence of conflict with humans in the Island Park area and elsewhere, it would be irresponsible to not start big game management of these animals. Controlled hunting has been shown to be the most effective way to manage wildlife populations and it would instill a natural fear of humans in these predators that is missing to some extent now. I highly encourage delisting of the grizzly bear as soon as possible.	FWS-R6-ES-2016-0042-0221	
Delisting Grizzly Bears is counterproductive and wrong. The ESA is not meant to recover an animal only to turn around and be killed....and to say Grizzlies have recovered is not following science. The decision is based on small interest groups. Science needs to lead in matters of wildlife. I do not support this decision. I do not support wildlife losing their homes to ranchers. The NW terrain is not suitable for introducing a non native domestic species. Wildlife should not be paying with their lives for ranchers inability to choose proper suitable locations to do business. Grazing domestic animals in the wilderness alone and unattended with absolutely no skills on how to act or react like a wild animal is cruel. Location is the key to any business, picking predator territory is lazy and entitled. Especially knowing they will be compensated for livestock lost to these predators they dangle their livestock in front of..... Keep grizzlies listed, give us back our public lands and kick ranchers out.						Factor C	Delisting Grizzly Bears is counterproductive and wrong. The ESA is not meant to recover an animal only to turn around and be killed....and to say Grizzlies have recovered is not following science. The decision is based on small interest groups. Science needs to lead in matters of wildlife. I do not support this decision. I do not support wildlife losing their homes to ranchers. The NW terrain is not suitable for introducing a non native domestic species. Wildlife should not be paying with their lives for ranchers inability to choose proper suitable locations to do business. Grazing domestic animals in the wilderness alone and unattended with absolutely no skills on how to act or react like a wild animal is cruel. Location is the key to any business, picking predator territory is lazy and entitled. Especially knowing they will be compensated for livestock lost to these predators they dangle their livestock in front of..... Keep grizzlies listed, give us back our public lands and kick ranchers out.	FWS-R6-ES-2016-0042-0224	

Last year alone 43 bears were killed in conflicts, most of which were food related deaths.						Factor C	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the ecosystem is full or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being criticized and questioned. - Population could be	FWS-R6-ES-2016-0042-0286	
Predators are essential in the circle of life....you take them away and the ecosystem crumbles downward. Hunting predators is counterproductive and foolish. I						Factor C	I am against the delisting of grizzly bears. Grizzlies are the slowest reproducing mammal in the world. 40 years and millions of dollars were spent to recover them from a little over hundred to just over 700. That took 40 YEARS!! Why so quick to delist? What is the point of recovery if you turn around and kill without letting the effects of recovery sink in for 10 years or so? And with climate change happening, you haven't given them a fair chance. Predators are essential in the circle of life....you take them away and the ecosystem crumbles downward. Hunting predators is counterproductive and foolish. I am strongly against the delisting. This decision is wrong and does not listen follow what science says. Keep Grizzly Bears Listed!! Thank you	FWS-R6-ES-2016-0042-0336	
As soon as their Endangered Species protection is removed, I fear that these iconic bears will be hunted mercilessly for their coats, paws, a noble head to mount on a hunter's wall or the animal's entire carcass to be preserved/taxidermy and displayed at a hunting lodge for bragging rights. Meanwhile, in the forest, orphaned cubs will die of starvation or, not having finished learning the lessons of how to be a "good bear" in a national park from its mother--i.e., which animals are food (elk, deer, vermin, berries, etc) and which are threat (humans), will become a danger to people and, ultimately, themselves. Left to their own devices, Grizzly bears typically prefer to avoid dangerous encounters with any rival predator. If humans become their #1 enemy again, be sure that their natural prey will suffer, too: overpopulation, explosion of disease that the predators would have controlled, and compromise in the genetic strength of the herds. When the Grizzly is no longer around to felled the weaker members of the species, any animal will have a greater chance of breeding, not just the strongest and fittest members.						Factor C	Grizzly bears are an important species, and their species population has not rebounded so much that they can long survive being removed from the list of Endangered and Threatened Wildlife. Just a couple weeks ago, I submitted a comment to protest the slaughter of Yellowstone Bison. Apparently, the Forest Service thought it was necessary to cull the species population to prevent the spread of a bovine virus that could infect domestic cattle grazing nearby. If there was truly a "healthy" size/population of Grizzly bears in the park, that cull would not have been needed. These and other apex predators (such as wolves, cougars, etc.) naturally hunt weakened prey animals such as the sick/infected bison. The bears help to maintain a healthy population balance between predator and prey species. As soon as their Endangered Species protection is removed, I fear that these iconic bears will be hunted mercilessly for their coats, paws, a noble head to mount on a hunter's wall or the animal's entire carcass to be preserved/taxidermy and displayed at a hunting lodge for bragging rights. Meanwhile, in the forest, orphaned cubs will die of starvation or, not having finished learning the lessons of how to be a "good bear" in a national park from its mother--i.e., which animals are food (elk, deer, vermin, berries, etc) and which are threat (humans), will become a danger to people and, ultimately, themselves. Left to their own devices, Grizzly bears typically prefer to avoid dangerous encounters with any rival predator. If humans become their #1 enemy again, be sure that their natural prey will suffer, too: overpopulation, explosion of disease that the predators would have controlled, and compromise in the genetic strength of the herds. When the Grizzly is no longer around to felled the weaker members of the species, any animal will have a greater chance of breeding, not just the strongest and fittest members. Please, please re-think your proposal to remove the protected status of these bears.	FWS-R6-ES-2016-0042-0349	
As I hike throughout the summer months I am running into too many grizzlies. I take all possible precautions, but the number of bears has become a danger.						Factor C	As SOMEONE WHO ACTUALLY LIVES IN GRIZZLY COUNTRY I support delisting. As I hike throughout the summer months I am running into too many grizzlies. I take all possible precautions, but the number of bears has become a danger. Please listen to the folks who know from first hand experience, and who live out west. Thank you.	FWS-R6-ES-2016-0042-0432	

As an individual who is employed in the conservation and protection field, all too often I personally witness careless individuals recreating in grizzly habitat who leave food and other odorous items well within the reach of bears. This lack of care by these individuals will only serve to create additional habituated bears which will need to be destroyed, thus further decreasing the population. The US Government has spent millions of dollars to protect and grow this population of bears, and now seem to want to throw that investment away. This is an unwise use of tax dollars.						Factor C	I am writing today to express my concerns about the delisting of the Grizzly Bear (<i>Ursus arctos horribilis</i>) from the Endangered Species Act (ESA). While the species might have reached population numbers which warrant delisting, this species is far from being on the road to permanent recovery. The science points to many obstacles which will prevent this species from thriving once removed from the ESA. From human development and conflicts (loss of habitat), to declining numbers of White Bark Pine and cutthroat trout, the species has a number of challenges facing it. In 2015, close to 10% of the total population was euthanized due to conflicts with human. It does not take a PhD to understand that at this rate, in just 10 years, the species would be extinct. As an individual who is employed in the conservation and protection field, all too often I personally witness careless individuals recreating in grizzly habitat who leave food and other odorous items well within the reach of bears. This lack of care by these individuals will only serve to create additional habituated bears which will need to be destroyed, thus further decreasing the population. The US Government has spent millions of dollars to protect and grow this population of bears, and now seem to want to throw that investment away. This is an unwise use of tax dollars. A recent survey indicated that 81% of visitors to the Greater Yellowstone Ecosystem want to see a bear. This data indicates that people vacationing come to Wyoming, and spend thousands of dollars per visit, with the hopes of seeing a bear. With a declining population due to delisting, less people will be afforded the opportunity to see a bear. As the population numbers further decline, one would expect less tourists to visit, resulting in less tourism dollars funneling into an already cash strapped state. In 2015, many of us got to see first hand what happens when an animal, well known by the public, is taken by a hunter. Cecil the Lion was hunted for nothing more than a trophy, in a similar way in which Grizzly Bears would be hunted should they be delisted. The public outcry was tremendous, resulting in the hunter nearly losing his dental practice due to the negative publicity. One must question if any of our elected public officials, outfitters, or local businesses are prepared for the type of public outcry which will happen if certain bears are killed by hunters. One outfitter in Jackson has been quoted as saying he wants bear 399's head on his wall. If the world's most famous Grizzly is allowed to be killed, simply out of spite and for a trophy, the repercussions on Wyoming's tourism industry will be great. Lack of you to reconsider the	FWS-R6-ES-2016-0042-0451	
In fact, the bear seems to be in decline from stable growth, due to food source depletion and habitat deterioration, human interaction mortality, both accidental and illegal, and scarcity of cub success due to the above human and environmental interactions.						Factor C	I have reviewed information concerning the delisting of Yellowstone's grizzly bears, and have reached the conclusion that there is not proof that the population of bears has grown to stable numbers. In fact, the bear seems to be in decline from stable growth, due to food source depletion and habitat deterioration, human interaction mortality, both accidental and illegal, and scarcity of cub success due to the above human and environmental interactions. The USFWS own recovery plan does not demonstrate that the YEP of Grizzly bears is stable and has reached a point that release from the ESA is warranted. Release of the bears from protection would undoubtedly cause very high trophy hunting mortality in the surrounding states of Wyoming, Idaho, and Montana, as YEP bears forage in wider ranges, not knowing park protection boundaries. Please do not remove grizzly bears from the federal list of endangered species. I am not a young tree hugger, but a grandfather, life NRA member, and an environmental hunter. I want my great-grandchildren to be able to see grizzly's in the wild.	FWS-R6-ES-2016-0042-0460	
Despite "training" and rules against killing female bears with cubs, it still happens because the females may leave their cubs in a tree to go forage for themselves.						Factor C	I am against the delisting of the Grizzlies. As a top tier predator, their presence is necessary to keeping their environment in check. While their numbers have been slowly increasing, they are not yet a stable population. Being, in effect, cut off from bears in other management and refuge areas by not having protected wildlife corridors between these places, you limit the genetic pool, which contribute to their decline. Instead of delisting, we need to not only protect the bears, but people who live in bear country need to learn to coexist with the bears and protected wildlife corridors need to be designated allowing bears to roam safely between the parks, refuges, and reserves. As for making profits from bears, photo safari's tend to make more money than trophy hunting because they can be taken almost all year round, and it doesn't end in death for the animals. Despite "training" and rules against killing female bears with cubs, it still happens because the females may leave their cubs in a tree to go forage for themselves. I have yet to get to visit the Yellowstone area, but I pray that when I do make it there, that the grizzly will be there and thriving.	FWS-R6-ES-2016-0042-0441	

1. Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population.					Factor C	1. Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population. 2. Grizzly bears are not recovered across their historic range. 3. Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399, would be threatened by the delisting. The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "the reality is that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yaak region." Therefore, the grizzly bear cannot be delisted in just the Great Yellowstone Area. Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting. 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. Finally, I agree with Tom Poor Bear who concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies. Livestock interests	FWS-R6-ES-2016-0042-5023	
The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been.					Factor C	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without	FWS-R6-ES-2016-0042-0463	
Disturbing images such as a viral video of cruel truck drivers chasing a Grizzly bear indicate that animal abusers are waiting to trap and bear bait these poor creatures. In no time their numbers will dwindle to nothing again.					Factor C	Grizzlies are key predators who aid in the critical 'trophic cascades' that encourage indigenous plant life and river health in the National Parks. These iconic mammals are still in danger with their numbers not being substantial; and the health of cubs who are not thriving and surviving, making their future uncertain. Disturbing images such as a viral video of cruel truck drivers chasing a Grizzly bear indicate that animal abusers are waiting to trap and bear bait these poor creatures. In no time their numbers will dwindle to nothing again. Bringing a species back from the verge of extinction takes time and delisting the Grizzly at this time, is too soon to give them a real chance to recover. DO NOT DELIST the Yellowstone Grizzly bears and doom them to the mercy of unscrupulous trophy hunters. Just like Cecil the Lino, these gorgeous and iconic bears deserve a chance to co-exist and find balance for their population in the future. Thank you!	FWS-R6-ES-2016-0042-0499	

2- DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes.						Factor C	Please consider the following as valid reasons NOT to remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. 1- EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. 2- DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. 3- GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected. 4- DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. 5- THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Please consider these issues closely before making a final decision. My hope is that the Grizzlies remain on the ESA for many years to come, as this is not the time to delist. But, if the final decision is to delist, I would certainly hope you would consider expanding the boundaries of protection for the Grizzlies around the GYE 20-50 miles. These Grizzlies do wander outside of the park boundaries in search of food and for hibernation, which would subject them to being hunted.	FWS-R6-ES-2016-0042-5055	
Yellowstone Grizzly bears are experiencing a high level of conflict with humans and delisting would mean that any hungry bear who steps outside Yellowstone National Park will be killed by waiting hunters. Bears do not recognize park boundaries and bears just need to eat.						Factor C	Please do not delist Grizzly Bears. Now is not the time to take away protections for this at-risk native species. In a time when climate change and habitat loss are challenging all wildlife to adapt and survive, the only reasonable and responsible action will be to rule that Grizzly Bears should not be delisted at this time. Grizzly bear food sources (including the whitebark pine) are collapsing and mortality rates are already increasing. Yellowstone Grizzly bears are experiencing a high level of conflict with humans and delisting would mean that any hungry bear who steps outside Yellowstone National Park will be killed by waiting hunters. Bears do not recognize park boundaries and bears just need to eat. The Greater Yellowstone Ecosystem is their home, and that includes the park and areas outside its boundaries. It is a fact that a prime motivation for the states of Idaho, Montana and Wyoming in pushing for delisting of Grizzly bears is trophy hunting and the perceived economic gain this 'sport' will bring. While the USFWS estimates there are more than 700 grizzlies in the Greater Yellowstone Ecosystem, no one really knows how many bears there are and this number could well be an over-estimation of true populations. Until it is known exactly how many grizzly bears exist in the Greater Yellowstone Ecosystem, it would be irresponsible to delist them and allow the states to open up their trophy hunt programs. Sport hunting is unnecessary for managing a stable bear population. At minimum, there should be a delay in the onset of hunting until Idaho, Montana and Wyoming have demonstrated their commitment to a responsible management plan and maintaining a stable population, particularly given the record high number (59) of bears killed in 2015. The leading cause of bear mortality is conflicts with humans. In remembrance of Scarface, the 25-year old Grizzly bear who was a park visitor favorite, and the first Grizzly bear I ever saw. Yet he was recently killed by a hunter outside park boundaries when he wandered, likely in search of food. A park icon gone, because he didn't read the park boundary signs and someone was waiting to kill him. This is what will happen to many more Grizzly bears if they are delisted now. Please do not delist Grizzly bears at this time. They must remain protected until Idaho, Montana and Wyoming have reasonable and science-based management plans in place, plans that do not consist of trophy hunting. Thank you for your consideration.	FWS-R6-ES-2016-0042-5074	

The leading cause of bear mortality is conflicts with humans.						Factor C	Please do not delist Grizzly Bears. Now is not the time to take away protections for this at-risk native species. In a time when climate change and habitat loss are challenging all wildlife to adapt and survive, the only reasonable and responsible action will be to rule that Grizzly Bears should not be delisted at this time. Grizzly bear food sources (including the whitebark pine) are collapsing and mortality rates are already increasing. Yellowstone Grizzly bears are experiencing a high level of conflict with humans and delisting would mean that any hungry bear who steps outside Yellowstone National Park will be killed by waiting hunters. Bears do not recognize park boundaries and bears just need to eat. The Greater Yellowstone Ecosystem is their home, and that includes the park and areas outside its boundaries. It is a fact that a prime motivation for the states of Idaho, Montana and Wyoming in pushing for delisting of Grizzly bears is trophy hunting and the perceived economic gain this 'sport' will bring. While the USFWS estimates there are more than 700 grizzlies in the Greater Yellowstone Ecosystem, no one really knows how many bears there are and this number could well be an over-estimation of true populations. Until it is known exactly how many grizzly bears exist in the Greater Yellowstone Ecosystem, it would be irresponsible to delist them and allow the states to open up their trophy hunt programs. Sport hunting is unnecessary for managing a stable bear population. At minimum, there should be a delay in the onset of hunting until Idaho, Montana and Wyoming have demonstrated their commitment to a responsible management plan and maintaining a stable population, particularly given the record high number (59) of bears killed in 2015. The leading cause of bear mortality is conflicts with humans. In remembrance of Scarface, the 25-year old Grizzly bear who was a park visitor favorite, and the first Grizzly bear I ever saw. Yet he was recently killed by a hunter outside park boundaries when he wandered, likely in search of food. A park icon gone, because he didn't read the park boundary signs and someone was waiting to kill him. This is what will happen to many more Grizzly bears if they are delisted now. Please do not delist Grizzly bears at this time. They must remain protected until Idaho, Montana and Wyoming have reasonable and science-based management plans in place, plans that do not consist of trophy hunting. Thank you for your consideration.	FWS-R6-ES-2016-0042-5074	
BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years.						Factor C	This is not even close to the time where Grizzly Bears should be delisted. Here are several reasons why I believe this is a wrong decision. 1- STATE MANAGEMENT SOURCES ARE HOSTILE AND JEOPARDIZE SPECIES SURVIVAL. These states, Wyoming, Montana and Idaho, have shown themselves to be incredibly hostile toward predators and are politically in bed with the ranchers and hunters. They fail to see the value of the Grizzly Bears just as they are as a tool to draw tourists into the Greater Yellowstone Eco System and believe they can make more money with \$50 to \$100.00 hunting licenses over millions and millions of tourists being drawn to the area to hopefully see a Grizzly. . Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. 2-- BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. 3- MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. Please consider these issues closely before making a final decision. My hope is that the Grizzlies remain on the ESA for many years to come, as this is not the time to delist. But, if the final decision is to delist, I would certainly hope you would consider expanding the boundaries of protection for the Grizzlies around the GYE 20-50 miles. These Grizzlies do wander outside of the park boundaries in search of food and for hibernation, which would subject them to being hunted. Thank you for your attention to this very important matter.	FWS-R6-ES-2016-0042-5097	

During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably are dead. This totals over 90 bears, or more than 12% of the population.						Factor C	We are adamantly against delisting the Greater Yellowstone Grizzly Bears from the Endangered and an Threatened Wildlife Species Act. An example as to why delisting of protected wildlife can be detrimental to a species has occurred with State management of the wolf population in Wyoming, Montana, and Idaho. Contest killings in both Montana and Idaho have occurred, which reflect the hatred that people have for "predator" species, and have been ignored by the States' FWS. The only certain outcome of delisting the Yellowstone grizzly bears is that it will result in trophy hunting. With delisting, the federal government will turn over grizzly management decisions outside of the park's boundaries to three states that will show no restraint in killing grizzlies. (Peacock, 2016) The Service has fiercely maintained that even if problems arise [under state management], it will not relist the population. Despite some laudatory language about co-existence with grizzly bears, the state grizzly bear management plans lack any binding commitments to do anything other than hunt bears. (Willcox, 2016) The growth of the grizzly population has leveled off; the current population estimate is down six percent from 2014. Mortality from all causes, as reported by the government, was 59 grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the bears that will be shot in the trophy hunt and you could easily approach 200 dead grizzlies in a single year. Even a population of 700 grizzly bears would be doomed to extinction by such heavy mortality. (Peacock, 2016) Even though the states may be somewhat cautious during the first five years of federal oversight that follows delisting, there is every reason to believe that, over time, state management will reverse the gains made over the last 40 years of endangered species protections. This is especially likely given the crisis that Yellowstone grizzly bears are facing now. During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably are dead. This totals over 90 bears, or more than 12% of the population. The primary factor affecting grizzly bears at both the individual and population level is excessive human-caused mortality. Regulating human-caused mortality through habitat management is an effective approach, as evidenced by increasing grizzly bear populations in the lower 48 States where motorized access standards exist (e.g., GYE and Northern Continental Divide Ecosystem). This requires ongoing monitoring of the grizzly bear population to understand if it is sufficiently resilient to allow for a conservative level of human-caused mortality without causing population decline.	FWS-R6-ES-2016-0042-5103	
The primary factor affecting grizzly bears at both the individual and population level is excessive human-caused mortality. Regulating human-caused mortality through habitat management is an effective approach, as evidenced by increasing grizzly bear populations in the lower 48 States where motorized access standards exist (e.g., GYE and Northern Continental Divide Ecosystem). This requires ongoing monitoring of the grizzly bear population to understand if it is sufficiently resilient to allow for a conservative level of human-caused mortality without causing population decline.					802	Factor C	We are adamantly against delisting the Greater Yellowstone Grizzly bears from the Endangered and an Threatened Wildlife Species Act. An example as to why delisting of protected wildlife can be detrimental to a species has occurred with State management of the wolf population in Wyoming, Montana, and Idaho. Contest killings in both Montana and Idaho have occurred, which reflect the hatred that people have for "predator" species, and have been ignored by the States' FWS. The only certain outcome of delisting the Yellowstone grizzly bears is that it will result in trophy hunting. With delisting, the federal government will turn over grizzly management decisions outside of the park's boundaries to three states that will show no restraint in killing grizzlies. (Peacock, 2016) The Service has fiercely maintained that even if problems arise [under state management], it will not relist the population. Despite some laudatory language about co-existence with grizzly bears, the state grizzly bear management plans lack any binding commitments to do anything other than hunt bears. (Willcox, 2016) The growth of the grizzly population has leveled off; the current population estimate is down six percent from 2014. Mortality from all causes, as reported by the government, was 59 grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the bears that will be shot in the trophy hunt and you could easily approach 200 dead grizzlies in a single year. Even a population of 700 grizzly bears would be doomed to extinction by such heavy mortality. (Peacock, 2016) Even though the states may be somewhat cautious during the first five years of federal oversight that follows delisting, there is every reason to believe that, over time, state management will reverse the gains made over the last 40 years of endangered species protections. This is especially likely given the crisis that Yellowstone grizzly bears are facing now. During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably are dead. This totals over 90 bears, or more than 12% of the population. The primary factor affecting grizzly bears at both the individual and population level is excessive human-caused mortality. Regulating human-caused mortality through habitat management is an effective approach, as evidenced by increasing grizzly bear populations in the lower 48 States where motorized access standards exist (e.g., GYE and Northern Continental Divide Ecosystem). This requires ongoing monitoring of the grizzly bear population to understand if it is sufficiently resilient to allow for a conservative level of human-caused mortality without causing population decline.	FWS-R6-ES-2016-0042-5103	

Uncertainty about the increased pressures of expanding human populations on the Grizzly families as more and more people move west, encroaching on their territory. That increased human presence, gobbling up the land, is only pressuring the Grizzlies into closer human contact, year by year.						Factor C	I am writing to implore you to stop the proposed delisting of the Grizzly Bear in the Greater Yellowstone Ecosystem from the Federal List of Endangered and Threatened Wildlife. The reported facts and research, compiled by different researchers, is conflicting, to say the least, in regards to defining the current Grizzly Bear population as recovered. Facts will always be conflicting as scientists view their data through their lens of their inquiry. We all have a way we see the world and it profoundly influences the actions we take. Call it the uncertainty principle or the observer effect from quantum physics. Although people try to do their best, I believe it is not possible to be completely objective in how they interpret their research. That's why it's important to listen to other's perspectives and take into consideration what they, too, are observing. So what we are left with is always the intention and motivation of those interpreting the data. That's where the true wisdom comes in. Delisting is not feasible or desirable at this time for many reasons. Grave uncertainty being the main one. Uncertainty about the ongoing unpredictable effects of climate change and how that unfolding story will influence the food choices and survival of the Grizzly Bears. Uncertainty about the increased pressures of expanding human populations on the Grizzly families as more and more people move west, encroaching on their territory. That increased human presence, gobbling up the land, is only pressuring the Grizzlies into closer human contact, year by year. And lastly, the uncertainty of the unpredictable behavior of humans who seek to kill a Grizzly for sport or vengeance if Grizzly Bears are no longer protected under federal law. Threats have already been made by some to seek out and intentionally kill one of the most famous Grizzly Bear mothers, 399, in Grand Teton National Park. Yes, progress has been made, but the conditions on the ground have changed dramatically since the IGBC was set in motion almost three decades ago. It is important to base this decision to potentially delist on the ground-truthing of this present century, not in goals of past decades when this Committee was first given this honorable task of recovering the at-risk populations. It is important for you to at least consider that it may never be wise or safe to delist the Grizzly Bear. And that does not constitute failure. That represents wisdom. I thank you for your service in regards to the leadership that has been entrusted to you, by all of us, the Public trust, to safeguard the well-being of our Greater Yellowstone Grizzly Bear population. Please don't take hasty actions to delist them based on short	FWS-R6-ES-2016-0042-5132	
DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes.						Factor C	THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain listed. Thank you	FWS-R6-ES-2016-0042-5148	
I oppose delisting grizzly bears for the following reasons: Delisting will not improve tolerance for grizzly bears or reduce poaching of grizzlies:I will speak to my research on gray wolves because of its relevance to all large carnivores including grizzlies. My research shows that tolerance for wolves did not improve when culling of wolves was allowed as measured by repeated mail-back questionnaires (http://faculty.nelson.wisc.edu/treves/pubs/Treves_etal_2013.pdf) and measured in repeated focal groups (http://faculty.nelson.wisc.edu/treves/pubs/Browne-Nunez2015.pdf). Nor did tolerance improve when hunting and trapping of wolves was permitted (http://faculty.nelson.wisc.edu/treves/pubs/Hogberg_Treves_Shaw_Naughton-Treves_2015.pdf). In 2009, I reviewed evidence whether regulated hunting was a conservation strategy for large carnivores including grizzlies. I concluded there was not yet evidence that human attitudes would improve or that poaching would improve if carnivores were subject to public hunting and trapping (http://faculty.nelson.wisc.edu/treves/pubs/Treves_Hunting_to_conserve_carnivores.pdf). Recent review casts doubt on the idea that killing improves tolerance for any predator (http://faculty.nelson.wisc.edu/treves/pubs/Treves_Bruskotter_2014.pdf). Indeed today our paper has appeared online (G. Chapron, A. Treves, equal co-authors, 2016. Blood does not buy goodwill: allowing culling increases poaching of a large carnivore. Proceedings of the Royal Society B http://dx.doi.org/10.1098/rspb.2015.2939). Our work shows that liberalizing wolf-killing increased poaching of wolves. The same is likely to happen with grizzly bear delisting.	803					Factor C	I am an associate professor of environmental studies and founder and director of the Carnivore Coexistence Lab at the University of Wisconsin-Madison. I have published >100 scientific papers on predator and prey ecology, carnivore management, and human dimensions of conservation. My team is the only team in the world to have published longitudinal studies of tolerance for a large carnivore by resampling the same individuals over time as policy changes. I oppose delisting grizzly bears for the following reasons: Delisting will not improve tolerance for grizzly bears or reduce poaching of grizzlies: I will speak to my research on gray wolves because of its relevance to all large carnivores including grizzlies. My research shows that tolerance for wolves did not improve when culling of wolves was allowed as measured by repeated mail-back questionnaires (http://faculty.nelson.wisc.edu/treves/pubs/Treves_etal_2013.pdf) and measured in repeated focal groups (http://faculty.nelson.wisc.edu/treves/pubs/Browne-Nunez2015.pdf). Nor did tolerance improve when hunting and trapping of wolves was permitted (http://faculty.nelson.wisc.edu/treves/pubs/Hogberg_Treves_Shaw_Naughton-Treves_2015.pdf). In 2009, I reviewed evidence whether regulated hunting was a conservation strategy for large carnivores including grizzlies. I concluded there was not yet evidence that human attitudes would improve or that poaching would improve if carnivores were subject to public hunting and trapping (http://faculty.nelson.wisc.edu/treves/pubs/Treves_Hunting_to_conserve_carnivores.pdf). Recent review casts doubt on the idea that killing improves tolerance for any predator (http://faculty.nelson.wisc.edu/treves/pubs/Treves_Bruskotter_2014.pdf). Indeed today our paper has appeared online (G. Chapron, A. Treves, equal co-authors, 2016. Blood does not buy goodwill: allowing culling increases poaching of a large carnivore. Proceedings of the Royal Society B http://dx.doi.org/10.1098/rspb.2015.2939). Our work shows that liberalizing wolf-killing increased poaching of wolves. The same is likely to happen with grizzly bear delisting. Delisting grizzly bears will not lead states to protect livestock better: Finally, traditional methods for managing bears in circumstances of livestock predation have not been effective in preventing further livestock losses (A. Treves, M. Krofel, J. McManus, Predator control need not be a shot in the dark. Front. Ecol. Environ., (in press). Delisting grizzly bears may open the U.S. Fish & Wildlife Service to lawsuits I'm also alerting you of the risk that you are faced to have abdicated	FWS-R6-ES-2016-0042-5166	

Also very familiar with the on-going development in and around Yellowstone, which shows no signs of slowing, let alone reversing the trend of putting ever more humans into the remnants of grizzly habitat and the predictable unfortunate outcome of bear-human interactions, which almost always end in grizzly mortality.						Factor C	I want to go on record as strongly OPPOSING de-listing for GYA grizzly bears from Endangered Species Act protections. As a 46-year resident of Montana I am very familiar with the Greater Yellowstone Area, its fish and wildlife. Also very familiar with the on-going development in and around Yellowstone, which shows no signs of slowing, let alone reversing the trend of putting ever more humans into the remnants of grizzly habitat and the predictable unfortunate outcome of bear-human interactions, which almost always end in grizzly mortality. I have personally backpacked into and camped out in every wilderness area in Montana, including into the Bob Marshall's famous Chinese Wall, all through Glacier as well as significant time in Yellowstone's backcountry. Truth is, I've seen exactly ONE grizzly bear during all those decades in the wild -- and that was in Glacier National Park. We do not hike with bear bells or other noise-makers on, so I'm quite sure we didn't "spook" any bears away on the hundreds of miles of trails hiked. I also skied across the entire length of both the Anaconda-Pintlar Wilderness (1983) and the Tobacco Root range (1997) and, despite it being early spring when the bears should have been coming out of hibernation, saw not one bear. Consequently, I'm finding it a little hard to believe we now have a "recovered" grizzly population in the Greater Yellowstone area -- or Montana, for that matter. The grizzlies in the Cabinet-Yaak area have been struggling for decades, despite "recovery" attempts and are primarily impacted by habitat loss due to logging and development, with the primary problem being human-caused mortality. It's worth considering the Cabinet-Yaak example because there is currently political pressure to increase logging throughout Montana, including in the GYA (Hebgen Lake area, specifically). Moreover, climate change has already severely impacted traditional food sources for GYA bears with the massive die off of white bark pines. Add to that the illegal introduction of lake trout into Y-stone Lake and the subsequent reduction in historic cutthroat trout spawning runs and the future food supplies for grizzlies in the GYA will probably lead to even more conflicts since both cattle and sheep graze public and private lands in the GYA -- and the Forest Service shows no signs of significantly reducing livestock grazing to protect grizzlies. Likewise, climate change is driving wildfires due to lower snowpack, shorter, warmer winters, earlier springs, drought, and much higher summer temperatures. While the wildfires do not "destroy" forests as some claim, they certainly do affect grizzly habitat. Given the incredibly small	FWS-R6-ES-2016-0042-5223	
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Likewise, climate change is driving wildfires due to lower snowpack, shorter, warmer winters, earlier springs, drought, and much higher summer temperatures. While the wildfires do not "destroy" forests as some claim, they certainly do affect grizzly habitat. Given the incredibly small "secure zones" for grizzlies, losing the forest cover in those areas to wildfire forces grizzlies into other areas and, again, more conflict with humans and livestock.						Factor C	I want to go on record as strongly OPPOSING delisting for GYA grizzly bears from Endangered Species Act protections. As a 46-year resident of Montana I am very familiar with the Greater Yellowstone Area, its fish and wildlife. Also very familiar with the on-going development in and around Yellowstone, which shows no signs of slowing, let alone reversing the trend of putting ever more humans into the remnants of grizzly habitat and the predictable unfortunate outcome of bear-human interactions, which almost always end in grizzly mortality. I have personally backpacked into and camped out in every wilderness area in Montana, including into the Bob Marshall's famous Chinese Wall, all through Glacier as well as significant time in Yellowstone's backcountry. Truth is, I've seen exactly ONE grizzly bear during all those decades in the wild -- and that was in Glacier National Park. We do not hike with bear bells or other noise-makers on, so I'm quite sure we didn't "spook" any bears away on the hundreds of miles of trails hiked. I also skied across the entire length of both the Anaconda-Pintlar Wilderness (1983) and the Tobacco Root range (1997) and, despite it being early spring when the bears should have been coming out of hibernation, saw not one bear. Consequently, I'm finding it a little hard to believe we now have a "recovered" grizzly population in the Greater Yellowstone area -- or Montana, for that matter. The grizzlies in the Cabinet-Yaak area have been struggling for decades, despite "recovery" attempts and are primarily impacted by habitat loss due to logging and development, with the primary problem being human-caused mortality. It's worth considering the Cabinet-Yaak example because there is currently political pressure to increase logging throughout Montana, including in the GYA (Hebgen Lake area, specifically). Moreover, climate change has already severely impacted traditional food sources for GYA bears with the massive die off of white bark pines. Add to that the illegal introduction of lake trout into Y-stone Lake and the subsequent reduction in historic cutthroat trout spawning runs and the future food supplies for grizzlies in the GYA will probably lead to even more conflicts since both cattle and sheep graze public and private lands in the GYA -- and the Forest Service shows no signs of significantly reducing livestock grazing to protect grizzlies. Likewise, climate change is driving wildfires due to lower snowpack, shorter, warmer winters, earlier springs, drought, and much higher summer temperatures. While the wildfires do not "destroy" forests as some claim, they certainly do affect grizzly habitat. Given the incredibly small	FWS-R6-ES-2016-0042-5223	
Continuing and strengthening programs that proactively minimize conflicts between bears and people thereby improving social tolerance and public acceptance for the bears throughout their range;						Factor C	Thank you for the opportunity to comment on potential Yellowstone Grizzly de-listing. Prairie Hills Audubon Society wants to be assured that the states and federal land management agencies, including the U.S. Forest Service, will manage bears and their habitat in a way that ensures a healthy and expanding grizzly bear population into the future. Prairie Hills Audubon Society is seriously concerned that the U.S. Fish and Wildlife Service (FWS) does not have all the required information and assurances finalized to make an informed decision. Specifically, the Endangered Species Act requires that, before delisting can occur, among other things, there are adequate regulatory mechanisms in place to ensure that the grizzly bear does not slip back towards extinction. These regulatory mechanisms are the responsibility of the states of Wyoming, Montana and Idaho and the appropriate federal land management agencies. However, the necessary management plans that provide these commitments have not been finalized and provided to us by the FWS for review with the proposal. Wyoming has yet to finalize a revised grizzly bear state management plan, and the recently completed draft is not consistent with statements made in the delisting proposal. It is unclear if, let alone when, Idaho or Montana will update their management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the adequate regulatory mechanisms that are required. With development increasing in the Northern Rockies region, public lands are critical for providing essential secure habitat for grizzly bears into the future. The agencies in charge of our public lands have an obligation to ensure that an iconic species like the grizzly bear can continue to thrive. However, the U.S. Forest Service has not revealed when it will amend the management plans of the six national forests surrounding Yellowstone to provide for adequate habitat protections for grizzly bears post-delisting or when this process would be available for public review. Prairie Hills Audubon Society encourages the FWS to continue to work with the state grizzly bear management agencies, tribal agencies and state and federal land management agencies that will be responsible for grizzly bears post delisting on: - Ensuring that robust protections remain in place for the Yellowstone grizzly bear core population including strict limits on mortality and strong habitat protections within the ~~Prism~~ <u>Core</u> ~~Concentration Area (DCA)~~ <u>the area identified to comprise the most protection for grizzly</u>	FWS-R6-ES-2016-0042-5311	
Isolation and the number of conflicts with hunters and livestock has not improved, but has deteriorated						Factor C	See attached file(s). In the attached file, I have comments on the following docket number: Number FWS-R6-ES-2016-0042. Attachments Comments on Delisting Grizzly Bears.20160331	FWS-R6-ES-2016-0042-0540	

Dr. Michael Gibeau has done a lot of research on the correlation between increased number of roads and bear mortality. Based on this information, bears are greatly affected by the amount of human interaction and can definitely stress them out. I believe that the best way to conserve the bears is to conserve their habitat and try to decrease the human interaction (for example by building fewer roads through their homes).						Factor C	The United States Fish and Wildlife Service proposes to remove the Greater Yellowstone Ecosystem (GYE) Grizzly Bears from the Endangered and Threatened Wildlife list. Also, the affected states promise to continue to ensure the grizzly bear population remains. I think that delisting the Grizzly Bears would only work if there were policies that were strictly enforced to ensure the continuation of the grizzly bear population. The major worry is that human caused mortality will quickly exceed the grizzly bear reproduction. Grizzly bear reproduction is a slow process and about half the cubs do not survive. Based on the fact that they are slow reproducers I believe the bears should stay on the endangered list for at least 5-10 more years and then maybe slowly introduce different policies that may allow regulated hunting again. According to an article in the national geographic that addresses this issue, it is believed that if the very states that failed to ensure the populations of grizzly bears gain control again, the population will quickly dwindle. Also, it is believed that this means the laws implanted will not be enforced well by these states. According to the article, the bears are worth a billion annually alive than dead, so it is better to keep the hunting levels down. Another problem endangering the grizzly bears is habitat and food. According to Yellowstone, there has been a 15-20 percent loss of their genetic variability. This could cause "inbreeding and worsen problems stemming from food loss, habitat loss and conflicts with people. A lot of these problems have to do with increased interaction between bears and humans. Dr. Michael Gibeau has done a lot of research on the correlation between increased number of roads and bear mortality. Based on this information, bears are greatly affected by the amount of human interaction and can definitely stress them out. I believe that the best way to conserve the bears is to conserve their habitat and try to decrease the human interaction (for example by building fewer roads through their homes). In conclusion I think that the bears should not be delisted, at least not right now. When thinking about laws as a nation we must remember there will always be people who break the law. Therefore delisting them can cause people to break the rules more and more, as the laws become increasingly lenient.	FWS-R6-ES-2016-0042-0569	
Housing, retailing, and energy development in Yellowstone's surrounding counties have been accelerating in the past decade. Additionally, the bears' major food sources - such as white bark pine nuts, cutthroat trout, and ungulate meat - are becoming threatened. The Grizzlies' are taking measures to compensate for this reduction in food, but it proves to be difficult with less livable area. Food shortage leads for Grizzlies to become hungrier and more desperate for food. Bear advocate Louisa Wilcox said, "when bears traverse the landscape looking for food, they bump into people at high rates, and when they bump into people, they tend to die at high rates." The bears' long-term could be in jeopardy because of less habitat and less food. Although the GYE Grizzlies' numbers are up now, delisting them could completely undo the progress of the past 40 years. The habitat encroachment and increased human activities around the Grizzlies' territory is also a cause for not delisting the animal. Counties surrounding National Parks are shown to have high rates of growth and Yellowstone is no exception. According to Yellowstone Park, "20 counties surrounding the Greater Yellowstone jumped a whopping 14 percent in population in the last decade." An increase in the human population will call for more roads, more houses, more materials gathered. All of these factors will leave less habitat space for bears, while increasing the likelihood of human and bear interactions, which, unfortunately, more often than not leads to a dead bear. Bears are also very opportunistic and will eat whatever food it can get its paws on. The problem with this is that once bears get into contact with food from humans, whether it is waste, bird feed or gardens, they will often return for more. Again, increasing the contact between humans and bears.						Factor C	The Greater Yellowstone Ecosystem (GYE) Grizzly Bear is an intelligent and emotional creature that is crucial to Yellowstone's and its surrounding areas' ecosystems. The population numbers alone show that the bear has more than tripled its numbers from the time the GYE Grizzly Bear was added to the Endangered Species List in 1975, growing from less than 200 to close to 800. This population increase is a huge improvement and cause for acknowledgement; however, the numbers alone do not tell the full story. Housing, retailing, and energy development in Yellowstone's surrounding counties have been accelerating in the past decade. Additionally, the bears' major food sources - such as white bark pine nuts, cutthroat trout, and ungulate meat - are becoming threatened. The Grizzlies' are taking measures to compensate for this reduction in food, but it proves to be difficult with less livable area. Food shortage leads for Grizzlies to become hungrier and more desperate for food. Bear advocate Louisa Wilcox said, "when bears traverse the landscape looking for food, they bump into people at high rates, and when they bump into people, they tend to die at high rates." The bears' long-term could be in jeopardy because of less habitat and less food. Although the GYE Grizzlies' numbers are up now, delisting them could completely undo the progress of the past 40 years. The habitat encroachment and increased human activities around the Grizzlies' territory is also a cause for not delisting the animal. Counties surrounding National Parks are shown to have high rates of growth and Yellowstone is no exception. According to Yellowstone Park, "20 counties surrounding the Greater Yellowstone jumped a whopping 14 percent in population in the last decade." An increase in the human population will call for more roads, more houses, more materials gathered. All of these factors will leave less habitat space for bears, while increasing the likelihood of human and bear interactions, which, unfortunately, more often than not leads to a dead bear. Bears are also very opportunistic and will eat whatever food it can get its paws on. The problem with this is that once bears get into contact with food from humans, whether it is waste, bird feed or gardens, they will often return for more. Again, increasing the contact between humans and bears. I oppose the proposed rule to delist the Greater Yellowstone Ecosystem Grizzly Bear because it will inevitably lead to the re-addition of the bear to the Endangered Species List. http://news.nationalgeographic.com/2015/10/15-001-grizzly-bears-animal-science-conservation	FWS-R6-ES-2016-0042-0571	

As a result of declining food sources, the bears have switched to more meat which increasingly puts them in conflict with ranchers and other humans. These conflicts often lead to the offending bear's removal from the ecosystem and resulted in a record number of bears removed last year.						Factor C	I strongly oppose the delisting of the Greater Yellowstone Ecosystem grizzly bear. First, these bears are under threat from a changing climate. They have four primary food sources. Two of these - whitebark pine seeds and cutthroat trout - have been decimated in recent years by climate change. The third food source - moths - is unreliable due to expanded pesticide use. Despite this, the USFWS has stated that climate change has not and likely will not have any impact on GYE grizzlies. This makes no sense and, in light of the wolverine decision, must be reconsidered. As a result of declining food sources, the bears have switched to more meat which increasingly puts them in conflict with ranchers and other humans. These conflicts often lead to the offending bear's removal from the ecosystem and resulted in a record number of bears removed last year. Further, GYE grizzlies are genetically isolated from bears in the north and there are no plans allowing for connectivity, which is critical for long term survival of the species. Grizzlies occupy a tiny fraction of their historic range so it is difficult to consider them "recovered." Finally, all three states involved - Wyoming, Montana and Idaho - have indicated that they will allow a trophy hunting season of these bears once delisted. Americans overwhelmingly disapprove of trophy hunting and, because there is no buffer or even no hunt zone between Yellowstone and Grand Tetons national parks, it is likely that famous roadside bears who are tolerant of people would be the first killed. This would create a firestorm of public outrage and damage the thriving tourism economy of the region. For these reasons, I oppose delisting and urge the USFWS to reexamine the plan to delist to consider the impact of climate change.	FWS-R6-ES-2016-0042-0660	
In Park County WY and Carbon county MT we are seeing devastating livestock losses from grizzly bears the are occurring on private deeded land in some instances several miles from the nearest forest service land. Over the course of the last decade these losses have grown exponentially to the point where we as food producers, and our local wildlife folks are being run ragged trying to minimize losses while not having clear options when the chips are down.						Factor C	I strongly support delisting the GYE grizzly bears. The bears have fully recovered and are expanding their ranges yearly to include new areas where severe conflicts occur. Our state game and fish managers are very capable of handling any conflicts that will arise while keeping a healthy, viable population that may thrive in non - conflict areas. In Park County WY and Carbon county MT we are seeing devastating livestock losses from grizzly bears the are occurring on private deeded land in some instances several miles from the nearest forest service land. Over the course of the last decade these losses have grown exponentially to the point where we as food producers, and our local wildlife folks are being run ragged trying to minimize losses while not having clear options when the chips are down. I appreciate the work you folks areally doing trying to do the right thing within the law and science , while trying to avoid the endless lawsuits that cost us ALL money. Thanks Brad Erickson	FWS-R6-ES-2016-0042-0655	
Conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat.						Factor C	The protections of the Endangered Species Act are critical to the continued recovery of GYE grizzly bears. Conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat.	FWS-R6-ES-2016-0042-0674	
Subsequently, bears are appearing more often in former habitat that is continually being subdivided. This human activity in prime habitat is continually putting bears in harms way. Many people in these areas do not properly handle their trash. This leads to more Human/ bear lethal incidents, this will continue to increase.						Factor C	Delisting an endangered species is a shortsighted goal. With ever increasing human population, climate change pressures on food sources and the subsequent changing of food sources, including the managed poisoning of invasive species in the Yellowstone lake tributaries has greatly changed food sourcing patterns. This pressure, along with the severe decline of the white bark pine high caloric food source, the 2 best resources are largely gone. This food pressure has force the bears to different areas and searching for different resources.. Subsequently, bears are appearing more often in former habitat that is continually being subdivided. This human activity in prime habitat is continually putting bears in harms way. Many people in these areas do not properly handle their trash. This leads to more Human/ bear lethal incidents, this will continue to increase. None of this helps the only lower 48 surviving populations to continue survive. With few producing sows, the last thing the bears need is delisting and the ensuing hunt. The grizzly is our heritage. There are not many even in the best of times. The data you see is skewed, simply by more intensive head counting by airplane and so forth. This would lead one to believe the numbers are increasing but in fact that is not known, it is only more efficient observation. With these methods a solid 20 years of the same head counting observations would provide a real data table of population numbers.	FWS-R6-ES-2016-0042-0791	
There are getting to be way to many Grizzly Bears in this area and they are traveling outside the National Park and killing the domestic animals on the surrounding ranches. The ranchers need to be able to protect their livestock from the bears!						Factor C	Please de-list the grizzly bears in the Greater Yellowstone Ecosystem area. There are getting to be way to many Grizzly Bears in this area and they are travelling outside the National Park and killing the domestic animals on the surrounding ranches. The ranchers need to be able to protect their livestock from the bears!	FWS-R6-ES-2016-0042-0817	
They are way past carrying capacity and will continue to wander outside of the park causing more serious conflicts with people and private interests. The bears are not more important than people and grizzly bears are not compatible with people in close proximity.						Factor C	It's far past time to delist the bears and allow state agencies to manage them along with the rest of the wildlife equation. They are way past carrying capacity and will continue to wander outside of the park causing more serious conflicts with people and private interests. The bears are not more important than people and grizzly bears are not compatible with people in close proximity. You have limited space in Yellowstone and predators need to be managed. You have already created an environmental disaster with uncontrolled wolf populations which has also impacted the food source for bears. Fix the bear problem now before more people die! I am deeply sorry that my grandchildren will never know the Yellowstone that I grew up with.	FWS-R6-ES-2016-0042-1015	

I submitted comments earlier in the process, but wish to do so again, as I have other issues to present. My family has grazed in the Upper Green River, on the Bridger-Teton National Forest, for well over 100 years. We have persisted in spite of the long trail, bureaucrats, and grizzly bears. At no time in the history of the Upper Green River Cattle Association, of which my family was a founding member 100 years ago this year, has depredation from large carnivores, especially grizzlies, been so pervasive. In 1993, our association saw its first grizzly kill in a generation, and in 2015 members of the association saw 80 head of livestock confirmed by Wyoming Game and Fish personnel as killed by grizzly bears. In 2015, this association lost more nearly 14% of its calf crop, or 290 calves, to natural causes and predation. This level of predation is unprecedented. We are excited to see that the grizzly bear may, once again, be delisted from the Endangered Species Act, and that management authority could return to the state of Wyoming. The Wyoming Game and Fish Department (WGFD) have been instrumental in supporting the recovery of this iconic species, and they have been great partners with our association through the thick and the thin of grizzly recovery. Without the compensation program initiated by the WGFD, most of us grazing cattle in the Upper Green would no longer be there, ending a 100 year tradition. Individual members of the WGFD have worked tirelessly, even 24/7, to resolve conflict issues when grizzlies kill livestock.					Factor C	I submitted comments earlier in the process, but wish to do so again, as I have other issues to present. My family has grazed in the Upper Green River, on the Bridger-Teton National Forest, for well over 100 years. We have persisted in spite of the long trail, bureaucrats, and grizzly bears. At no time in the history of the Upper Green River Cattle Association, of which my family was a founding member 100 years ago this year, has depredation from large carnivores, especially grizzlies, been so pervasive. In 1993, our association saw its first grizzly kill in a generation, and in 2015 members of the association saw 80 head of livestock confirmed by Wyoming Game and Fish personnel as killed by grizzly bears. In 2015, this association lost more nearly 14% of its calf crop, or 290 calves, to natural causes and predation. This level of predation is unprecedented. We are excited to see that the grizzly bear may, once again, be delisted from the Endangered Species Act, and that management authority could return to the state of Wyoming. The Wyoming Game and Fish Department (WGFD) have been instrumental in supporting the recovery of this iconic species, and they have been great partners with our association through the thick and the thin of grizzly recovery. Without the compensation program initiated by the WGFD, most of us grazing cattle in the Upper Green would no longer be there, ending a 100 year tradition. Individual members of the WGFD have worked tirelessly, even 24/7, to resolve conflict issues when grizzlies kill livestock.	FWS-R6-ES-2016-0042-1222	
In the past four years on the Upper Green River Cattle Allotment, confirmed depredations caused by grizzly bears have increased from 20 in 2010 to 80 in 2015. Since 1995, there have been over 500 head of cattle confirmed to have been killed by grizzly bears on this allotment. I fully support delisting of this species, as they have met every recovery goal ever established, and there have been several. Further, I support sport hunting of this species in areas like the Upper Green, where substantial conflict exists. I support management flexibility to address individual bears, not just numbers in a matrix. The Upper Green is in the Designated Monitoring Area (DMA), and the DMA was created to be an area both biologically suitable and socially acceptable for grizzly expansion. I have fought against the inclusion of the Upper Green in this grizzly management area, because the level of conflict that exists there is not socially acceptable to those of us making a living there. I ask that the Upper Green be removed from inclusion in the DMA. If the DMA is actually an area that is biologically important to grizzly bear recovery, then designate it such, but this area does not qualify as being socially acceptable for grizzly bears. The PCA was designated early on to be that area essential for grizzly bear recovery, and it has served that purpose well, as grizzlies have expanded great distances beyond the PCA. I am concerned that land use restrictions that have been put in place in the PCA, will be pushed throughout the DMA. I do not believe that is appropriate. How will the DMA boundary be amended in the future, as there is no process in place? If the states live up to their part of the bargain, and grizzlies continue to meet delisting requirements for the five year period that a conservation strategy is designed to exist for, can the DMA boundary be changed? USFWS should only retain management control for the five year period after the grizzly is delisted, then the states should have full management authority, unless the population demographics are not maintained. Why is there no physical description of the DMA is this proposed federal rule?					Factor C	I submitted comments earlier in the process, but wish to do so again, as I have other issues to present. My family has grazed in the Upper Green River, on the Bridger-Teton National Forest, for well over 100 years. We have persisted in spite of the long trail, bureaucrats, and grizzly bears. At no time in the history of the Upper Green River Cattle Association, of which my family was a founding member 100 years ago this year, has depredation from large carnivores, especially grizzlies, been so pervasive. In 1993, our association saw its first grizzly kill in a generation, and in 2015 members of the association saw 80 head of livestock confirmed by Wyoming Game and Fish personnel as killed by grizzly bears. In 2015, this association lost more nearly 14% of its calf crop, or 290 calves, to natural causes and predation. This level of predation is unprecedented. We are excited to see that the grizzly bear may, once again, be delisted from the Endangered Species Act, and that management authority could return to the state of Wyoming. The Wyoming Game and Fish Department (WGFD) have been instrumental in supporting the recovery of this iconic species, and they have been great partners with our association through the thick and the thin of grizzly recovery. Without the compensation program initiated by the WGFD, most of us grazing cattle in the Upper Green would no longer be there, ending a 100 year tradition. Individual members of the WGFD have worked tirelessly, even 24/7, to resolve conflict issues when grizzlies kill livestock. In the past four years on the Upper Green River Cattle Allotment, confirmed depredations caused by grizzly bears have increased from 20 in 2010 to 80 in 2015. Since 1995, there have been over 500 head of cattle confirmed to have been killed by grizzly bears on this allotment. I fully support delisting of this species, as they have met every recovery goal ever established, and there have been several. Further, I support sport hunting of this species in areas like the Upper Green, where substantial conflict exists. I support management flexibility to address individual bears, not just numbers in a matrix. The Upper Green is in the Designated Monitoring Area (DMA), and the DMA was created to be an area both biologically suitable and socially acceptable for grizzly expansion. I have fought against the inclusion of the Upper Green in this grizzly management area, because the level of conflict that exists there is not socially acceptable to those of us making a living there. I ask that the Upper Green be removed from inclusion in the DMA. If the DMA is actually an area that is biologically important to grizzly bear recovery, then designate it such, but this area does not	FWS-R6-ES-2016-0042-1222	

Climate change and it's impacts on grizzly bear habitat, behavior and food selection is perhaps the greatest threat to the Yellowstone grizzlies. These threats and potential impacts are not yet fully understood. With traditional and critical food sources such as whitebark pine nuts, cutthroat trout, army cutworm moths, wild berries, elk and bison already on the decline, grizzlies are already wondering farther and into new territory in search of other food. This puts them in increasing conflict with humans, which means increased mortality for bears. I do realize that grizzly bears are adaptable, opportunistic omnivores, but the impacts of them adapting to new food sources has not been adequately addressed and is not yet fully understood. That, combined with a growing human population and other associated threats to grizzly habitat, adds up to some serious and legitimate concerns about the future of Yellowstone grizzlies.						Factor C	While I greatly respect, appreciate and applaud your tremendous and successful efforts to help Yellowstone grizzly bear populations recover from the threat of extinction, there are too many legitimate concerns -- voiced by some very prominent grizzly bear biologists, managers and other experts -- to remove the Yellowstone grizzly population from the Endangered Species Act at this time. I urge you to err on the side of caution and ensure these concerns and threats regarding grizzlies are better understood and dealt with before you delist them. Climate change and it's impacts on grizzly bear habitat, behavior and food selection is perhaps the greatest threat to the Yellowstone grizzlies. These threats and potential impacts are not yet fully understood. With traditional and critical food sources such as whitebark pine nuts, cutthroat trout, army cutworm moths, wild berries, elk and bison already on the decline, grizzlies are already wondering farther and into new territory in search of other food. This puts them in increasing conflict with humans, which means increased mortality for bears. I do realize that grizzly bears are adaptable, opportunistic omnivores, but the impacts of them adapting to new food sources has not been adequately addressed and is not yet fully understood. That, combined with a growing human population and other associated threats to grizzly habitat, adds up to some serious and legitimate concerns about the future of Yellowstone grizzlies. There are also other, legitimate concerns about how state management of grizzly bears might impact the ability of grizzly bears to expand through critical linkage zones and eventually connect with other populations to help ensure the long-term genetic health and viability of the Yellowstone grizzly populations. Until we know more about the potential impacts of these serious threats to the Yellowstone grizzlies, I urge you to err on the side of caution and not delist the population at this time. We have come a long way in the recovery of grizzly bears in the Yellowstone ecosystem; let's ensure the long-term health, viability and survival of these bears is truly secure before acting too hastily. The bears deserve more time, caution and consideration. Thank you for your consideration, and thanks again for all you have done and continue to do to help grizzly bears recover.	FWS-R6-ES-2016-0042-5387	
maintaining a stable population, without arbitrary reductions in the number of bears and a strong commitment from Montana, Idaho, and Wyoming to reduce conflicts between people and bears.						Factor C	I am very wary of the proposal to delist the GYE population of grizzly bears from the federal list of endangered wildlife. If the delisting does indeed proceed forward, it should be done with great caution in favor of the grizzlies' continued chance of survival and thriving. I strongly support the following provisions in the delisting rule: -- protecting the bear's core habitat, with meaningful and enforceable habitat protections, including limits on development and roads. -- maintaining a stable population, without arbitrary reductions in the number of bears and a strong commitment from Montana, Idaho, and Wyoming to reduce conflicts between people and bears. -- a commitment to habitat connectivity for bear migrations and genetic diversity -- managing the GYE population as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. Grizzly bears are a magnificent creature and any ecosystem that has healthy populations of them is very fortunate on multiple levels. Where I live, in the North Cascades, the grizzlies are missing and we are working hard to get them back. Thank you for careful consideration of the above recommendations when moving forward in the GYE.	FWS-R6-ES-2016-0042-1250	
Given uncertainty in larger ecosystem functions due to climate change, real uncertainty about survival of critical plant species for the survival of grizzlies, continued fragmentation of habitat from development, significant and ongoing potential for unforeseen disease striking a small and fragmented species, (e.g. Whitnose bat syndrome) it is inappropriate to delist a long lived, slowly reproducing species which survives in a much diminished and fragmented habitat range.						Factor C	I am writing to object to the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered Species. Given uncertainty in larger ecosystem functions due to climate change, real uncertainty about survival of critical plant species for the survival of grizzlies, continued fragmentation of habitat from development, significant and ongoing potential for unforeseen disease striking a small and fragmented species, (e.g. Whitnose bat syndrome) it is inappropriate to delist a long lived, slowly reproducing species which survives in a much diminished and fragmented habitat range. It is particularly objectionable to delist a species we've invested so much in to maintain genetic diversity and while evaluating the reintroduction into the North Cascades with a primary outcome being the issuance of trophy hunting permits which provides no one essential resource to human survival. Retaining this species in healthy population numbers sufficient to withstand changing future conditions we cannot predict is our generational obligation. I urge the USFWS to not delist the Yellowstone Grizzly.	FWS-R6-ES-2016-0042-1271	

The 59 listed kills in 2015 is actually about half the actual kills.						Factor C	Do not delist the Grizzly bear for the following reasons. 1. FWS's mission is to protect wildlife, not delist. 2. The delisting will result in condemning the Grizzly to certain slaughter. 3. Climate change has decimated the pine nuts and wrecked havoc on the food sources despite what reports say. 4. Delisting is a death warrant for countless bears. 5. Obsolete methods of counting the bears are being used in jeopardy of good science. 6. This is a violation of ethics to destroy an iconic species that draws many dollars to the tri state area. Also, FWC has the obligation to protect, not sanction the killing of these magnificent creatures. They are a vital part of the West. 7. This apex predator plays a vital role. The reintroduction of the wolf in Yellowstone was a huge positive influence. 8. The 59 listed kills in 2015 is actually about half the actual kills. 9. Delisting will kill 200 bears out of the 700 in the first year. This is unacceptable and unsustainable. 10. FWC is losing credibility nationally for doing just this type of wildlife "management" which factors into "takes" that is only sugar coats the slaughter that results. 11. The ranching, hunting, grazing and other special interest groups are being overly patronized to via these unsound, lack of scientific decisions that destroy a species that many resources have gone into preserving & protecting. Do the right thing and don't even think about this ridiculous, tragic proposal that leave FWC with still another ill conceived decision that will forever taint your legacy. Thank you for the consideration. Show some vision and stand your ground.	FWS-R6-ES-2016-0042-1512	
BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. As stated above, grizzlies are already being slaughtered by hunters. The claim of self-defense has yet to be verified, even after 5 months of investigation. If the Grizzly bear is delisted, further conflict with humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years.						Factor C	My position on the proposed rule concerning the Removal of Grizzly Bears from the Greater Yellowstone Ecosystem from the Endangered and Threatened Wildlife list is as follows: - The proposed rule does nothing to address the lack of an adequate grizzly gene pool in the Yellowstone area. The existing grizzly population is to small and lacks access to other populations north of this ecosystem. There currently are no plans between Montana, Idaho or Wyoming to provide the means for grizzlies to reach other bear populations which would give them the opportunity to improve the biological diversity. - DECLINING FOOD SOURCES: It has been documented by Wildlife Management teams that grizzlies main food sources have been wiped out due to climate change (whitebark pine), invasive species (cutthroat trout) and use of pesticides in/and near the Yellowstone Ecosystem (moths). While some waterways are being restocked with cutthroat trout, this is only a part of the necessary diet for grizzly bears. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. Montana, Wyoming and Idaho have shown themselves to be incredibly hostile toward predators. Bears trying to disperse have become victims of trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. Such is likely to be the norm after delisting. Any bear that has it's den outside the Grand Teton Park, Yellowstone Park, or on national forest lands, there is a good chance that these bears will be killed by hunters. This happened in November 2015 in Montana at the northern edge of the Yellowstone Ecosystem when a hunter, claiming self defense without proof of any aggression shown by the bear, shot and killed with one bullet, Grizzly #211, also known as Scarface, an aged grizzly (26 plus years) who happened to be in poor health. To add insult to the poaching of #211, the State of Montana withheld media release of this incident until after the comment period for the Delisting Grizzlies proposal was passed. This is exactly the kind of thing that removing Grizzlies from the Endangered List will become the norm for Montana, Wyoming and Idaho, under the guise of protecting the bears. The only protections these states want is to line their state coffers by the trophy hunters. - MOST AMERICANS OPPOSE DELISTING. Fifty-five percent of Americans are opposed to delisting.	FWS-R6-ES-2016-0042-1550	
4. In addition to habitat loss, the backcountry is seeing increasing use as human populations rise in the area, meaning there is increased chance of human encounters, leading to more grizzly deaths.						Factor C	See attached file Attachments Comment on Grizzly Bear Delisting	FWS-R6-ES-2016-0042-1618	

Second, a record number of bears died last year even while protected. Many of these occurred due to some human conflict - hunters, livestock operations etc. Indeed, just this week, the wildlife loving community was shocked to learn that an elk hunter killed famous Bear 299 (Scarface) last November. Why this information was withheld for so long makes one wonder.						Factor C	Please do not remove Endangered Species Act protections from the grizzly bears of the Greater Yellowstone Ecosystem. These bears are at great risk from climate change, human conflict and a slow reproductive rate. First, temperatures in Yellowstone already 1.4F higher they were last century. Because of those rising temperatures, we have seen a massive decline (up to 95%) in whitebark pine seeds. This is one of four important food sources for the bears and particularly impacts mother bears. If this is what 1.4 degrees has done, what will happen as temperatures continue to rise. We simply don't know and therefore should proceed carefully. Second, a record number of bears died last year even while protected. Many of these occurred due to some human conflict - hunters, livestock operations etc. Indeed, just this week, the wildlife loving community was shocked to learn that an elk hunter killed famous Bear 299 (Scarface) last November. Why this information was withheld for so long makes one wonder. The more important point, though, is that these bears are being killed in record numbers EVEN WITH PROTECTIONS IN PLACE. Why on earth, with this escalated decline, would we remove protections at this time. Finally, grizzlies have one of the slowest reproductive rates in North America. A dramatic population decline could happen quite quickly if a few mother bears are killed. I agree with the majority of scientific experts on the grizzly delisting. "An Ohio State University master's student, Harmony Szarek, found in her thesis that nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act." Most experts do not think these bears should be delisted. Most Americans (55% according to United States Humane Society) agree. Listen to the scientific experts. Listen to the people. Don't Delist Grizzly Bears!	FWS-R6-ES-2016-0042-1644	
their isolation in Yellowstone deprives them of fresh genetic input, which leads to weakness and compromised health of future generations. Instead of removing these grizzlies from the Federal List of Endangered and Threatened Wildlife, there should be an all-out effort to permanently open up safe corridors so they can travel out of the park from Yellowstone through to central Idaho and on up to the Yukon, and back. Every effort should be made to establish this. I						Factor C	To FWS - regarding proposed rule to remove Yellowstone's grizzly bears from the Federal List of Endangered and Threatened Wildlife: Grizzlies are top predators, and are absolutely essential for keeping the Yellowstone ecological system intact. Scientists know that grizzlies are an "indicator species", and that their health and viability are crucial for a thriving ecosystem in Yellowstone. Grizzlies are already losing a major part of their food supply, the Whitebark pine nut, which puts them at serious risk for malnutrition and disease. Also, much of their feeding sources are in wide open areas, and delisting them will only serve to make them easy targets for game hunters and trophy shooters, putting them at serious risk for ultimate demise. In addition, their isolation in Yellowstone deprives them of fresh genetic input, which leads to weakness and compromised health of future generations. Instead of removing these grizzlies from the Federal List of Endangered and Threatened Wildlife, there should be an all-out effort to permanently open up safe corridors so they can travel out of the park from Yellowstone through to central Idaho and on up to the Yukon, and back. Every effort should be made to establish this. It is imperative that you DO NOT delist these bears.	FWS-R6-ES-2016-0042-1652	
A record number of Yellowstone area grizzly bears were already killed in 2015 despite Endangered Species Act protections. The grizzly population is already being removed for increased conflicts with ranchers and illegal hunting as they roam further out to look for food sources to compensate for their primary food sources being affected by climate change and other environmental impacts. As a result of these increased numbers of grizzly bear killings it is far too early to delist them without further study and discussion of other management plans.						Factor C	As a tax payer I would like to make my concerns known about any management plan to delist the Yellowstone Grizzlies. I am opposed for the following key reasons. 1. I have not seen any climate change impact study completed showing the impact on the current grizzly population. It has taken over 40 years to rebuild the grizzly population and they could be greatly impacted by climate change and their ability to survive if changes continue to negatively impact their food source such as it has with the Whitebark Pine. 2. Other food sources are declining as well due to other environmental reasons such as the Cutthroat Trout being lost due to invasive species taking over and moths are increasingly unreliable due to man's use of pesticides. These three primary food sources for grizzlies in decline mean that the current grizzly population will already be under stress to continue to survive without hunters being allowed to kill them as well. 3. Grizzly bears are already facing these hardships and coupled with being one of the slowest reproducing mammals we have in the United States it is a certainty that the killing of females would decimate the population within a very short period of time. Grizzlies have already lost 99% of their range. Yellowstone is one of the last of their territories in the continental United States and we must be cognizant of that fact if hunting is allowed and they cannot sustain reproduction. 4. While the vast majority Americans, 90% by a national poll, support the Endangered Species Act hunters have historically had the "ear" of state management and have been allowed to hunt species to near extinction, we must reverse this hostile management style in Yellowstone as many more people visiting this beautiful National Park want to see LIVE bears. Case in point bear 399 a female that thousands upon thousands of visitors from the US and around the world come back to see year after year with her cubs. The hunting clubs already have a target on her back and this does not bode well for Yellowstone tourism as well as the grizzly bear population as a whole. As well as wanting to preserve the endangered species act most Americans also oppose delisting the Yellowstone grizzlies. Only 26% of Americans actually want to delist the grizzly. The vast majority again want and expect the USFWS to do their job and continue to protect the wildlife under their care. 5. A record number of Yellowstone area grizzly bears were already killed in 2015 despite Endangered Species Act protections. The grizzly population is already being removed for increased conflicts with ranchers and illegal hunting as they roam further out to look for food	FWS-R6-ES-2016-0042-1750	

Such actions as mandating that ranchers remove their garbage and carcass dumps to county facilities, the use of bear-proof garbage cans in communities, camping areas, etc. within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for hunters and other public land users in grizzly habitat need to be implemented within the GYE before grizzlies are delisted.						Factor C	I am apposed to delisting grizzly bears in the Greater Yellowstone Ecosystem (GYE) for the following reasons: 1. The fact is that one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services numbers. But what we do know is that at least 60 grizzlies died last year, mostly at the hand of man, and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest, if not the lowest reproductive rate of any mammal in the GYE. The continuation of such mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work needs to be done in the GYE to prevent many of these grizzly deaths before this population can be safely delisted. Such actions as mandating that ranchers remove their garbage and carcass dumps to county facilities, the use of bear-proof garbage cans in communities, camping areas, etc. within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for hunters and other public land users in grizzly habitat need to be implemented within the GYE before grizzlies are delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations, endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate bears from other populations into the GYE to improve genetic diversity but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat in the GYE and prevent them from colonizing other lands in which they were originally found. This will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of this land is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead should be "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. 3. Historically important	FWS-R6-ES-2016-0042-1765	
Plus there have been too many of them killed off already and no one has paid a penalty for it. There is a lot of Shoot, Shovel and Shut up going on that we don't hear about that is going on. Where is our law enforcement. They are getting paid but not doing their job and if they are it's letting hunters shoot grizzlies in our national parks and in their ecosystem where it's illegal. Use the bear spray and not the rifle.						Factor C	I support keeping grizzlies on the Endangered Species Act. Their numbers are still low and and they should never be hunted for trophies and when money is involved. Nor should they be controlled by the governors of the states surrounding our national parks. Nor the cattle industry, NRA or any politicians especially from back east. With our climate change effecting our weather or a major fire through Yellowstone and its ecosystem could effect these grizzlies where it might be too late to bring them back from extinction. Plus there have been too many of them killed off already and no one has paid a penalty for it. There is a lot of Shoot, Shovel and Shut up going on that we don't hear about that is going on. Where is our law enforcement. They are getting paid but not doing their job and if they are it's letting hunters shoot grizzlies in our national parks and in their ecosystem where it's illegal. Use the bear spray and not the rifle. The national parks belong to the people that enjoy the scenery and wildlife and not for the hunters who want to kill, kill, kill. Do not delist the grizzly bears.	FWS-R6-ES-2016-0042-1830	
"Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Å						Factor C	I most adamantly oppose your agency's proposal to strip endangered species act protection from the Greater Yellowstone Ecosystem grizzly bear rebutting each of your claims for wanting to do so. You claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." You claim: The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. You claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater	FWS-R6-ES-2016-0042-1835	
It's beyond time to delist the grizzly bear. As a land owner near Gardiner, MT I have to deal with them on a regular basis. They have broken into sheds, harassed my horses, and threatened myself and my wife. I have seen as many as 14 different bears in one day. Please take them off the list so that we have more latitude in dealing with the problem bears.						Factor C	It's beyond time to delist the grizzly bear. As a land owner near Gardiner, MT I have to deal with them on a regular basis. They have broken into sheds, harassed my horses, and threatened myself and my wife. I have seen as many as 14 different bears in one day. Please take them off the list so that we have more latitude in dealing with the problem bears.	FWS-R6-ES-2016-0042-1849	

The delisting plan fails to address issues associated with high, ongoing human caused grizzly bear mortality. Most of the grizzly bears that die in the Greater Yellowstone Ecosystem die of human causes, and most are avoidable. While Yellowstone Park and some communities outside the park have gone to enormous measures to remove grizzly bear attractants, others have not. The problem of mortality of food-habituated bears will only get worse after delisting, when allowable mortality levels are raised, and resources for conflict resolution are reduced. Because problem grizzly bears are a human safety problem, it only makes sense to resolve the ongoing sanitation issues in the ecosystem before delisting.						Factor C	The proposal to delist Yellowstone Grizzly Bears is irresponsible and will result in the decimation of our Country's iconic symbol of the West. For the following reasons below the proposal to delist must be abandoned: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. 2. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout. 3. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. The population will decline after delisting, and cannot be sustained without life-support measures. 4. The delisting plan fails to address issues associated with high, ongoing human caused grizzly bear mortality. Most of the grizzly bears that die in the Greater Yellowstone Ecosystem die of human causes, and most are avoidable. While Yellowstone Park and some communities outside the park have gone to enormous measures to remove grizzly bear attractants, others have not. The problem of mortality of food-habituated bears will only get worse after delisting, when allowable mortality levels are raised, and resources for conflict resolution are reduced. Because problem grizzly bears are a human safety problem, it only makes sense to resolve the ongoing sanitation issues in the ecosystem before delisting. 5. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public. 6. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The	FWS-R6-ES-2016-0042-1912	
Look how many people have been killed in the last 5 years, by grizzly bears. Look at how many bears are relocated every year. They take them from one place to another. Then when they get in trouble there, they bring them back. They have no fear of humans.						Factor C	The grizzly bears need to be delisted. There are too many for what forest and food is available. Look how many people have been killed in the last 5 years, by grizzly bears. Look at how many bears are relocated every year. They take them from one place to another. Then when they get in trouble there, they bring them back. They have no fear of humans. There numbers have over exceeded there goal since they was listed. We live with the bears, and the Wyoming Game and Fish should have control over the grizzlyls to manage them like they should.	FWS-R6-ES-2016-0042-1931	
The Yellowstone grizzly population is an island population, and with that comes inbreeding and the potential for devastating genetic effects, and greater susceptibility to disease!						Factor C	See Attached Attachments Carson Millie	FWS-R6-ES-2016-0042-2459	
Each year some of Yellowstone grizzlies are killed by vehicular traffic. That fact alone should negate a hunting season! Even if the bear is delisted why does it need to be hunted?						Factor C	See Attached Attachments Carson Millie	FWS-R6-ES-2016-0042-2459	
In 2015, record number of Yellowstone area grizzly bears were killed despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. A - IF HUNTING IS ALLOWED, THERE SHOULD BE x BUFFER ZONES around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park;						Factor C	- AS WE SAW WITH SCARFACE, BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. In 2015, record number of Yellowstone area grizzly bears were killed despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and	FWS-R6-ES-2016-0042-2493	
Since the early to mid-2000s, two of the four key grizzly bear foods, cutthroat trout and the seeds of whitebark pine, have collapsed. Drought, climate warming and predation by a nonnative trout have nearly extirpated cutthroat trout in Yellowstone Lake. Whitebark pine have been functionally wiped out by the spread of a non-native fungal disease and by a highly lethal and unprecedented climate-driven outbreak of bark beetles.						Factor C	I OPPOSE the delisting of the Grizzly Bears. Why rush with a decision to delist, when all indicators are of a population that is vulnerable and positioned to decline even more than they already have?" - Dr. David Mattson Dr. Jane Goodall opposes delisting also. Yellowstone's grizzly bears have lost critically important foods. Since the early to mid-2000s, two of the four key grizzly bear foods, cutthroat trout and the seeds of whitebark pine, have collapsed. Drought, climate warming and predation by a nonnative trout have nearly extirpated cutthroat trout in Yellowstone Lake. Whitebark pine have been functionally wiped out by the spread of a non-native fungal disease and by a highly lethal and unprecedented climate-driven outbreak of bark beetles. Most elk populations have also declined some dramatically-- from highs reached during the 1990s and early 2000s. There is no doubt that food resources of Yellowstone's grizzly bears have declined and put the population at grave risk, with a prognosis of more of the same to come. State-level management of large carnivores is a problem. State wildlife management agencies in the West are locked down in an Iron Triangle that serves the minority special interests of those who want to kill deer, elk, moose, and bighorn sheep (i.e., ungulates). State agencies view large carnivores primarily as competitors for ungulates that could otherwise be on the market for sport hunting licenses, which are a major source of agency revenue. Sport hunting has been used during recent decades to drive down populations of mountain lions and wolves, and, accounts for roughly 70-80% of all deaths of adult carnivores in the region. Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals. Grizzly bears are vulnerable to the excesses of state-level wildlife management. Grizzly bears have one of the lowest reproductive rates of any terrestrial mammal. A typical female will only produce 2 cubs once every 3 years, with good odds that one of the cubs will die before it reaches adulthood. Grizzly bears also have difficulty colonizing new habitats, primarily because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates, and readily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state sponsored sport hunting, and much less able to recover from predictable hunting	FWS-R6-ES-2016-0042-2615	

the Yellowstone ecosystem lost 59 bears just last year due to human conflict. This loss is not sustainable given the grizzlies' exceedingly low reproductive rate. Rather than delisting, the agency should be cautious and determine whether this loss is a continuing trend and, if so, what its impact will be on the species' survival.						Factor C	Please reconsider the misguided and risky plan to delist Yellowstone area grizzly bears. Two out of three independent experts oppose removing grizzlies from the protections of the Endangered Species Act. These experts, instead, recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. According to these experts, of greatest concern to the populations' continued survival is habitat loss, habitat modification and human-caused grizzly mortality. Indeed, the Yellowstone ecosystem lost 59 bears just last year due to human conflict. This loss is not sustainable given the grizzlies' exceedingly low reproductive rate. Rather than delisting, the agency should be cautious and determine whether this loss is a continuing trend and, if so, what its impact will be on the species' survival. I agree with the majority of experts. The plan to delist grizzlies is not ready for prime time. If the agency insists on pushing this, it needs to significantly revise the proposed rule to address climate change, human-caused mortality, habitat fragmentation and more. It needs to add buffer zones and put a moratorium on hunting in place. Please listen to the experts - and not the local governors, livestock operations and hunters. Please keep grizzlies protected under the Endangered Species Act.	FWS-R6-ES-2016-0042-2791	
The plan to delist grizzlies is not ready for prime time. If the agency insists on pushing this, it needs to significantly revise the proposed rule to address climate change, human-caused mortality, habitat fragmentation and more. It needs to add buffer zones and put a moratorium on hunting in place.						Factor C	Please reconsider the misguided and risky plan to delist Yellowstone area grizzly bears. Two out of three independent experts oppose removing grizzlies from the protections of the Endangered Species Act. These experts, instead, recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. According to these experts, of greatest concern to the populations' continued survival is habitat loss, habitat modification and human-caused grizzly mortality. Indeed, the Yellowstone ecosystem lost 59 bears just last year due to human conflict. This loss is not sustainable given the grizzlies' exceedingly low reproductive rate. Rather than delisting, the agency should be cautious and determine whether this loss is a continuing trend and, if so, what its impact will be on the species' survival. I agree with the majority of experts. The plan to delist grizzlies is not ready for prime time. If the agency insists on pushing this, it needs to significantly revise the proposed rule to address climate change, human-caused mortality, habitat fragmentation and more. It needs to add buffer zones and put a moratorium on hunting in place. Please listen to the experts - and not the local governors, livestock operations and hunters. Please keep grizzlies protected under the Endangered Species Act.	FWS-R6-ES-2016-0042-2791	
1. Fact is, no one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services computer generated numbers. But, what we do emphatically know is that at least 60 grizzlies died last year and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest reproductive rate of any mammal in the GYE. The continuation of such high mortality rates will likely very soon result in a critically low GYE grizzly population.						Factor C	I live within the Greater Yellowstone Ecosystem (GYE) and am apposed to delisting grizzly bears in the GYE for the following reasons: 1. Fact is, no one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services computer generated numbers. But, what we do emphatically know is that at least 60 grizzlies died last year and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest reproductive rate of any mammal in the GYE. The continuation of such high mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work is needed in the GYE to prevent many of unnecessary grizzly deaths before this population can be safely delisted. Such actions as requiring ranchers to relocate their garbage and carcass dumps to secure county facilities, the use of bear-proof garbage cans in communities within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for public land users, and stiffer penalties for illegal killings need to be employed within the GYE prior to grizzlies being delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate grizzlies from other populations into the GYE to improve genetic diversity, but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat and prevent them from colonizing other lands in which they were originally found. This "discouragement" will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of the land grizzlies would be "discouraged" from is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. For the future	FWS-R6-ES-2016-0042-3124	

Groups including the Sierra Club, Defenders of Wildlife, the Humane Society, the Center for Biological Diversity and the Natural Resource Defense Council all released statements saying the delisting was "premature". They argue that the Yellowstone bear population isn't that stable. In specific they stated: "The Yellowstone grizzly bear population is isolated from other populations of bears. They've also been experiencing high levels of conflicts this year with people," said Sylvia Fallon with the National Resources Defense Council. "And their population has not grown and is likely declining. That's following the loss of white bark pine, which is a critically important food source for them." The conservation groups are urging the U.S. Fish and Wildlife Service to undertake more research instead of removing protection for the Yellowstone grizzlies.						Factor C	USFWS, please listen to the environmental groups that oppose the proposal to take the Yellowstone Grizzlies off the Endangered Species List. Groups including the Sierra Club, Defenders of Wildlife, the Humane Society, the Center for Biological Diversity and the Natural Resource Defense Council all released statements saying the delisting was "premature". They argue that the Yellowstone bear population isn't that stable. In specific they stated: "The Yellowstone grizzly bear population is isolated from other populations of bears. They've also been experiencing high levels of conflicts this year with people," said Sylvia Fallon with the National Resources Defense Council. "And their population has not grown and is likely declining. That's following the loss of white bark pine, which is a critically important food source for them." The conservation groups are urging the U.S. Fish and Wildlife Service to undertake more research instead of removing protection for the Yellowstone grizzlies. USFWS, please follow their recommendation and refrain from delisting the Yellowstone Grizzlies.	FWS-R6-ES-2016-0042-3251	
Conflicts between grizzlies and humans are mainly due to livestock predation and hunter encounters. Their continued protection would put the onus on us, requiring us to learn how to live with them instead of them bearing our faults. There are ranchers living among grizzlies that have had few or no conflicts with bears for years because they have learned how to alter their practices. We know how to reduce human/grizzly conflicts, but if delisted, the indiscriminate killing (eventual hunting) would do little to reduce these conflicts.						Factor C	The IGBC has worked tirelessly for the recovery of grizzlies for many years and their population has increased a modest amount since 1975 when they were initially listed and I commend their efforts. I ask the question, what is the purpose and need to delist the GYE grizzly. I worked for the BLM my entire career and I know the pressure to delist species so management activities can go forward. I know the states have put pressure to allow their agencies to take over management, but let's let science decide and leave the politics to the politicians. Here is the need to continue the protection of GYE grizzly bears: 1. Grizzlies reproduce at one of the slowest pace of any large mammal in the US, so any loss of adult females would significantly adversely affect their overall population. 2. Even though grizzlies eat a wide variety of foods, the majority rely on whitebark pine seeds while others rely on Yellowstone cutthroat trout which have both significantly declined in recent years. These losses result in grizzlies looking for alternate high protein and fat food sources which may be one of the reasons why human caused grizzly deaths are on the increase. 3. Visitors to Yellowstone and Grand Teton National Parks provide hundreds of millions of dollars to the local economy and one of the main reasons for their visitation is to see live grizzly bears. I realize the ESAs purpose is not to provide economic stimulus, however, there is little doubt if grizzly bear hunts are allowed, less opportunity for bear observations will occur. 4. By continuing the protection, the grizzly gene pool will be maintained or improved. Furthermore, as they continue to expand their home ranges, their natural migration into the Bitterroot Mountains and Northern Continental Divide would be enhanced, instead of the continual isolation of the GYE. 5. Conflicts between grizzlies and humans are mainly due to livestock predation and hunter encounters. Their continued protection would put the onus on us, requiring us to learn how to live with them instead of them bearing our faults. There are ranchers living among grizzlies that have had few or no conflicts with bears for years because they have learned how to alter their practices. We know how to reduce human/grizzly conflicts, but if delisted, the indiscriminate killing (eventual hunting) would do little to reduce these conflicts. Grizzlies have two main needs, to eat and breed. Their main food sources before winter fat up are significantly declining and any loss of adult bears and especially breeding females would adversely affect their population and continued recovery. One of the greatest moments of my life occurred while hiking in Glacier NP.	FWS-R6-ES-2016-0042-3293	
Two of their four major foods have all but been wiped out due to climate change, disease and invasive species. And they may be killed if they prey on livestock in their increasingly difficult search for food.						Factor C	Please don't do this again! We've de-listed the Wolves, the Buffalo, now this - all for a quick buck for tags and hunters coming in. Do you realize there is more money to be MADE by tourists wishing to see these "American" animals? What with climate change creating food source challenges, these animals are NOT ready to be taken off the Endangered Species list whatsoever. Two of their four major foods have all but been wiped out due to climate change, disease and invasive species. And they may be killed if they prey on livestock in their increasingly difficult search for food. Their survival is by no means that significantly improved as there are ONLY 700! That's less than the tiger, who is considered "Endangered" in the world. Please, these Grizzlies as well as the Wolves and Buffalo are National Treasures species not found ANYWHERE else but in the United States. Is there ANYTHING sacred and safe about our heritage that is NOT for SALE? Grizzlies are important to the eco balance of our wilderness area's and must be protected. Their numbers will diminish quickly, and assuredly if you let the hunters move in. Fires in Canada should show you plainly how delicate our situation is with respect to wildlife survival. Please, make our heritage not for sale. I want to see these animals alive not in a virtual reality, zoo, or an old movie. Their contribution our world is too important. Thank you!	FWS-R6-ES-2016-0042-3651	
Please focus instead on continued efforts to eliminate the human stupidity of failing to secure garbage and in other ways jeopardize these bears.						Factor C	Please do not remove the grizzly bear in the Greater Yellowstone Ecosystem Montana, Idaho and Wyoming from the Federal Lists of Endangered and Threatened Wildlife. Grizzly bears are almost nonexistent throughout the continental US, so the bears in the Greater Yellowstone Ecosystem are all the more essential. Please focus instead on continued efforts to eliminate the human stupidity of failing to secure garbage and in other ways jeopardize these bears. Thank you!	FWS-R6-ES-2016-0042-3774	

And finally, the gateway communities around Yellowstone National Park receive and estimated benefit of \$US500 Million, and tourism is an important ongoing factor to jobs in the area. Tourists come for the large apex predators such as bears and wolves and to reduce the opportunity of viewing a large mammal such as a Grizzly is foolhearty. As an annual international visitor and a writer who often promotes the park to literally hundreds of thousands of potential tourists each year, I cannot understand why government would even be thinking of delisting just on this basis alone.						Factor C	I wish to comment on the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I wish to strongly oppose such a removal for the following reasons: 1. Climate Change Impacts Climate change is a real, scientific and provable issue and the park and its inhabitants have already been affected. To dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." with no proper scientific evidence is laughable. The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule, which is highly questionable. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population. This leads into my second point. 2. Declining food resources There is no evidence in The Rule for true accounting on this point. Historically, there have been four critical foods for grizzlies in Yellowstone: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are "generalists with a broad range in diet", but what really is important for maintaining the population is availability of high quality food at the right time of the year within an INTACT ECOSYSTEM. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. These four points have not been taken into consideration. This is unscientific. 3. Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies as an indication that grizzlies have reached a static	FWS-R6-ES-2016-0042-3805	
Unprotected bears, wandering outside of the park in search of food only to find the end of a rifle may lead to a much larger reduction in population than the FWS is proposing with its 675 target, especially since humans can already kill grizzlies they perceive to be a threat to their life or property.						Factor C	I am against delisting the GYE grizzly bear. Climate change will continue to alter habitat and affect food sources, along with impacts to behavior, seasonal shifts, among other unknowns. Two important bear foods in the GYE, Whitebark pine and westslope cutthroat trout, continue to decline due to climate change and competition with invasives. Although bears are opportunistic eaters, the GYE is not very abundant or diverse in its food sources. Fewer natural food sources to choose from mean that grizzly bears will likely be forced out of the protected boundary in search of other food items that may get them into trouble, such as cattle and garbage. Unprotected bears, wandering outside of the park in search of food only to find the end of a rifle may lead to a much larger reduction in population than the FWS is proposing with its 675 target, especially since humans can already kill grizzlies they perceive to be a threat to their life or property. Now is not the time to remove GYE grizzly bears from protection, when climate change will only continue to raise temperatures and cause additional impacts yet to be identified. I am against delisting the GYE grizzly bear. The unknown impacts of climate change are far too great to not be adequately taken into account when proposing delisting. USFWS suggest that all bear foods are equal and can easily be interchanged, however, this is not the case. Whitebark pine nuts are high in protein and, when they were still in abundance, low in energy loss. Scientists have yet to find an alternative equivalent to the high protein, low caloric output in the GYE. Additionally, grizzly bears are among the slowest reproducing land mammals in North America and females undergo delayed implantation. If a female grizzly has mated but does not put on enough pounds over the summer months to sustain and bear the energetic costs of pregnancy during hibernation, the blastocyst will not implant in her uterus and she will not give birth. Thus without adequate food sources, it will be very difficult for female GYE grizzly to reproduce and sustain the population.	FWS-R6-ES-2016-0042-3861	
The proposed rule does not address the genetic isolation of the bears, the issues that are caused by declining food sources, and the fact that grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. This problem is exacerbated by the poaching of bears that occurs even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. This will lead them into most populated areas and make them more vulnerable to being killed. Therefore it is necessary for them to remain protected and allowed to exist in an area that keeps them safe and does not encourage them to seek food and shelter elsewhere.						Factor C	The proposed rule does not address the genetic isolation of the bears, the issues that are caused by declining food sources, and the fact that grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. This problem is exacerbated by the poaching of bears that occurs even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. This will lead them into most populated areas and make them more vulnerable to being killed. Therefore it is necessary for them to remain protected and allowed to exist in an area that keeps them safe and does not encourage them to seek food and shelter elsewhere.	FWS-R6-ES-2016-0042-3889	

Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations in particular and with humans in general can be expected as grizzlies are forced to range ever farther looking for food sources to replace those lost in recent years.						Factor C	Please do NOT remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife! 1) The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. 2) Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. 3) Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations in particular and with humans in general can be expected as grizzlies are forced to range ever farther looking for food sources to replace those lost in recent years. 4) GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, they are particularly vulnerable to excessive killing by humans. Last year 59 grizzlies were killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow-reproducing species. 5) TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states KNOWN for their hatred of and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and MOST Americans (55%) OPPOSE de-listing. Even more Americans (68%) OPPOSE the hunting of grizzly bears. Thank you, HJ	FWS-R6-ES-2016-0042-4240	
GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, they are particularly vulnerable to excessive killing by humans. Last year 59 grizzlies were killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow-reproducing						Factor C	Please do NOT remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife! 1) The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. 2) Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. 3) Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations in particular and with humans in general can be expected as grizzlies are forced to range ever farther looking for food sources to replace those lost in recent years. 4) GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, they are particularly vulnerable to excessive killing by humans. Last year 59 grizzlies were killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow-reproducing species. 5) TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states KNOWN for their hatred of and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and MOST Americans (55%) OPPOSE de-listing. Even more Americans (68%) OPPOSE the hunting of grizzly bears. Thank you, HJ	FWS-R6-ES-2016-0042-4240	
With the loss of whitebark pine, grizzlies have turned to a diet more focused on meat. This conversion to meat puts bears in greater conflict with humans - namely hunters and livestock operations. What happens when grizzlies conflict with humans? Grizzlies die. In fact, a record number of grizzly bears died in the Yellowstone ecosystem just last year. Moreover, 80% of adult grizzly deaths can be attributed to human causes.						Factor C	I oppose delisting of grizzly bears because (1) the population has not grown in recent decades, (2) death rates have actually increased, and (3) changes to food sources puts grizzly bears in greater conflict with humans. First, even the United States Fish & Wildlife Service concedes that the Yellowstone grizzly population has not grown since the early 2000s. Indeed, there are nearly as many bears in the ecosystem today as there were 15 years ago. It is true the bears are more visible but this is not due to a population increase. Rather, this is due to changing food sources which force grizzlies to range further in search of food. Even though they are omnivores, not all foods are created equal. We humans, as omnivores, know that a steak does not equal a salad. With the loss of whitebark pine, grizzlies have turned to a diet more focused on meat. This conversion to meat puts bears in greater conflict with humans - namely hunters and livestock operations. What happens when grizzlies conflict with humans? Grizzlies die. In fact, a record number of grizzly bears died in the Yellowstone ecosystem just last year. Moreover, 80% of adult grizzly deaths can be attributed to human causes. Grizzly bear deaths are actually increasing in the ecosystem. From 2002-2011, grizzly deaths increased at a rate of 9-11% a year. Therefore, the population is not necessarily stable. With a stagnant growth rate and increasing death rate, why would USFWS even be considering removing these bears from the Endangered Species List? Please listen to the science - the best available science - and keep Yellowstone area grizzly bears protected under the Endangered Species Act.	FWS-R6-ES-2016-0042-4244	
It is true that the grizzlies continued recovery may lead to more to more potentially dangerous human contact. These interactions, however, can be mitigated through education on bear behavior and contact avoidance programs. With the grave concerns on the loss of food sources already challenging the bear's recovery, adding hunting to the equation would be premature and place added pressure on the species and potentially threaten its future survival.						Factor C	See attached file(s) Attachments Alex Public Comment	FWS-R6-ES-2016-0042-4267	

Sport hunting of a threatened population is simply unacceptable. Given the historical backdrop of how these animals were wiped out through hunting and trapping, both for sport and in defense of stock the notion of reintroducing recreational hunting is unacceptable and entirely inconsistent with the history of this population. As important, sport hunting of Yellowstone grizzlies, which is not a food source, is inconsistent with a modern, mature treatment of wildlife and we deserve better from federal and state governments. While this may be unpopular to say, sometimes it is the responsibility of the federal government to impose modern and humane standards of behavior on regional populations which are not in step with contemporary norms. This country's history is replete with examples that need no recitation here. Idaho, Montana and Wyoming legislatures and wildlife agencies have giddily embraced the prospect of sport hunting the GYE grizzly population. We cannot allow the same factors that required protection under the ESA to threaten the population again.					Factor C	I strongly OPPOSE the planned delisting of Yellowstone area grizzly bears under the terms of the proposed Rule for the following reasons: I. The conclusions set forth in the Rule are not supported by the facts relied on by the Service. The Rule asserts the GYE population of grizzlies is recovered, sustainable, and will not be adversely impacted by the anticipated mortality resulting from hunting and management. However, the numbers don't add up. When you add the acknowledged slow down in growth due to white bark pine, which has cut population growth by 96% (7% to .3% on the high end), then add the 20% expected mortality from hunting, you are effectively imposing a cull on the GYE grizzly population. A population which the Rule never suggests is excessive. The Rule only suggests the population is now at carrying capacity. Add to this the 25 grizzlies killed by wildlife managers last year alone and the Rule clearly sets up a dramatic and adverse reduction in population numbers. Further, despite the white bark pine issue being critical to the 9th Circuit's conclusion to prevent delisting, the Rule dismisses the impact of white bark pine with almost no substantive explanation. The Rule simply characterizes population slow down as carrying capacity without any meaningful explanation (or effort to refute) the correlation between population trend and availability of critical food sources. Further, the Rule acknowledges only one third of the population doesn't eat white bark pine; the other two thirds of the population do. The Service is required to treat the population as a whole, and the majority relies on white bark pine pine. It appears there is still a significant amount of uncertainty regarding the factors which prevented delisting the first time around and the Rule offers only a very superficial effort to dismiss the shortcomings this time. The conclusions therefore are not reasonable and not based on the best available science. As the Service (and the courts) are aware, the Service is mandated to proceed with institutionalized caution. It's neither legally nor morally sound to simply roll the dice with the future of a threatened species. II. State regulatory commitments clearly are not in place and are not explained. The Rule indicates over and over that viable state regulatory commitments must be in place before delisting can occur. However, the commitments are not detailed, not explained, and clearly are not binding. One of the public's biggest concerns appears to be the proposed hunting of grizzlies on the 12% of suitable habitat outside of each boundary. What portion of the population is on the 12% outside boundary?	FWS-R6-ES-2016-0042-4257	
Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. A					Factor C	#NAME?	FWS-R6-ES-2016-0042-4274	
As bears seek out yet more meat to compensate for the collapse of these foods, they are being killed at unsustainably high rates that threaten their survival.					Factor C	I write to express my opposition to delisting of Yellowstone grizzly bears, and support of the efforts of Tribes to preserve the iconic and sacred Great Bear. State and federal agencies have not addressed the mounting threats of human development, climate change, invasive species, and the subsequent loss or diminishment of key foods, including whitebark pine seeds, cutthroat trout, and elk. As bears seek out yet more meat to compensate for the collapse of these foods, they are being killed at unsustainably high rates that threaten their survival. I am concerned that delisting would give full management authority to the states of Idaho, Wyoming and Montana, which are notoriously hostile to large carnivores. State management guarantees a grizzly bear sport hunt, which is not justified in light of current excessive mortality rates. Further, if grizzly bears are delisted, the states plan to eliminate them in habitat that is critical to their long-term recovery. Despite significant reductions in the availability of human foods and attractants to grizzly bears, humans are still the number one cause of bear mortality. Instead of delisting, a move that would dry up funds and lower agency commitment to coexistence programs, the Department of Interior should redouble efforts to reduce human-bear conflicts. Delisting is also premature due to the long-term isolation of Yellowstone's grizzly bears. Relying on trucking in bears to deal with the problem of genetic isolation is risky and unwise, especially when it is still possible to naturally reconnect Yellowstone and Northern Continental Divide grizzly bear populations. Restoration of grizzly bears in the vast Selway Bitterroot recovery area would also boost connectivity between Northern Rockies ecosystems. Delisting and sport hunting would undermine prospects for connectivity and permanently isolate Yellowstone's grizzly bears. I support the efforts of a growing coalition of Tribes that is dedicated to protecting Yellowstone's bears and preventing delisting. I ask that you initiate formal consultation with all involved tribes, and promptly correct the disrespectful and dismissive behavior of your staff towards Indian people involved with the grizzly bear issue. The sovereignty of Tribes must be recognized and respected. Recovery of the Yellowstone grizzly bear population is achievable, but not if the hard-fought gains of the last 40 years are reversed by delisting. Please do not risk the future of Yellowstone's iconic grizzly bears. Thank you for your consideration	FWS-R6-ES-2016-0042-4399	

Despite significant reductions in the availability of human foods and attractants to grizzly bears, humans are still the number one cause of bear mortality. Instead of delisting, a move that would dry up funds and lower agency commitment to coexistence programs, the Department of Interior should redouble efforts to reduce human-bear conflicts.						Factor C	I write to express my opposition to delisting of Yellowstone grizzly bears, and support of the efforts of Tribes to preserve the iconic and sacred Great Bear. State and federal agencies have not addressed the mounting threats of human development, climate change, invasive species, and the subsequent loss or diminishment of key foods, including whitebark pine seeds, cutthroat trout, and elk. As bears seek out yet more meat to compensate for the collapse of these foods, they are being killed at unsustainably high rates that threaten their survival. I am concerned that delisting would give full management authority to the states of Idaho, Wyoming and Montana, which are notoriously hostile to large carnivores. State management guarantees a grizzly bear sport hunt, which is not justified in light of current excessive mortality rates. Further, if grizzly bears are delisted, the states plan to eliminate them in habitat that is critical to their long-term recovery. Despite significant reductions in the availability of human foods and attractants to grizzly bears, humans are still the number one cause of bear mortality. Instead of delisting, a move that would dry up funds and lower agency commitment to coexistence programs, the Department of Interior should redouble efforts to reduce human-bear conflicts. Delisting is also premature due to the long-term isolation of Yellowstone's grizzly bears. Relying on trucking in bears to deal with the problem of genetic isolation is risky and unwise, especially when it is still possible to naturally reconnect Yellowstone and Northern Continental Divide grizzly bear populations. Restoration of grizzly bears in the vast Selway Bitterroot recovery area would also boost connectivity between Northern Rockies ecosystems. Delisting and sport hunting would undermine prospects for connectivity and permanently isolate Yellowstone's grizzly bears. I support the efforts of a growing coalition of Tribes that is dedicated to protecting Yellowstone's bears and preventing delisting. I ask that you initiate formal consultation with all involved tribes, and promptly correct the disrespectful and dismissive behavior of your staff towards Indian people involved with the grizzly bear issue. The sovereignty of Tribes must be recognized and respected. Recovery of the Yellowstone grizzly bear population is achievable, but not if the hard-fought gains of the last 40 years are reversed by delisting. Please do not risk the future of Yellowstone's iconic grizzly bears. Thank you for your consideration	FWS-R6-ES-2016-0042-4399	
It widely reported that 80% of bear mortality rates are caused by humans. Their official and unofficial encroachment on "secure habitat" for bears, the need to put bears down due to lack of fear of humans, as the bears have become spectacles for those in cars, watching as the bears feed from garbage dumpsters, among other reasons bears and humans clash.						Factor C	Hello, Being clear that this initiative isn't related to the increase in size of the Grizzly population in Yellowstone Park, but rather the management of space to allow enough "secure habitat" to accommodate the growing, yet minuscule in the larger view of saving a species, would have garnered more respect. By the estimations in your proposal, the bear population in the lower 48 is approx. 1680 bears, spread out between the 6 areas including Yellowstone. Naturalists' do not consider the subject county nor the situation enough in number to sustain a healthy species. According to EParks, there are approx. 1,300 grizzly bears living in the wild today. In the 1800's, an estimated 50,000 grizzlies populated the lower 48 between the Great Plains and the Pacific Coast. The range of occupation now is 2% of its former natural habitat. (www.eparks.org) I apologize for the improper documentation, but I assure you all data is valid so far as is available on available websites. It widely reported that 80% of bear mortality rates are caused by humans. Their official and unofficial encroachment on "secure habitat" for bears, the need to put bears down due to lack of fear of humans, as the bears have become spectacles for those in cars, watching as the bears feed from garbage dumpsters, among other reasons bears and humans clash. Of the 5 suggested remaining sites that could sustain bears, Selkirk, the Northern Cascades, and the Cabinet-Yaak area, apparently have the space but lack the resources to inhabit grizzly bears, as those pops. have been lost. The Bitterroot Recovery Zone is a laughable suggestion, as they apparently are barren of bears though they sit just atop and to the west of Yellowstone. The Northern Continental Divide Ecosystem is evidently the only thriving (unprotected?) bear population, this may be due to being the only site large enough to absorb human interference. Losing protection, this still endangered species, the Yellowstone grizzly, hasn't a large enough population to survive, and without repeating the same strategies implemented in 1974, will become an American National Park without grizzly bears. This will most likely, as with toying with the Yellowstone wolf population, lead to the eventual extinction of a species so ingrained in North American history that it can't be understated. Should you outlive the fruition of the decreasing 2% of habitable land for this national symbol to exist, the history of these misguided intentions, taking another step closer to snuffing out of this species, will still be with us all. Something of America will have been lost, and all your words will not bring it back.	FWS-R6-ES-2016-0042-4554	

Livestock and human conflicts have been increasing every year (WGFD 2015). The planning within this document provides adequate data to prove that grizzlies have recovered and are at their carrying capacity for the Greater Yellowstone Ecosystem. With help from State and Tribal agencies and the Interagency Grizzly Bear Study Team (IGBST), the USFWS has shown that grizzlies can be delisted (42 USC 4321-4370 1969) and should be managed by State and Tribal governments.						Factor C	The notion of delisting grizzly bears (<i>Ursus arctos horribilis</i>) from the Endangered Species List has been important to concerned Wyoming residents for quite some time now. I grew up in Cody, Wyoming where I have hunted, fished and travelled horseback through most of the Shoshone National Forest and Absaroka Wilderness. As a hunter and conservationist, I have personally witnessed part of the recovery of this species and believe that the population has recovered and this proposed rule should be made final. This docket was prepared in regards to the growing population of grizzly bears in the Greater Yellowstone Ecosystem (GYE). In compliance with the National Environmental Policy Act (NEPA), this statement is in the proposed rule for public comment (42 USC 4321-4370 1969). Livestock and human conflicts have been increasing every year (WGFD 2015). The planning within this document provides adequate data to prove that grizzlies have recovered and are at their carrying capacity for the Greater Yellowstone Ecosystem. With help from State and Tribal agencies and the Interagency Grizzly Bear Study Team (IGBST), the USFWS has shown that grizzlies can be delisted (42 USC 4321-4370 1969) and should be managed by State and Tribal governments. In accordance to the population ecology background, density-dependent and density-independent factors can regulate a population size (42 USC 4321-4370 1969). Intraspecific killing has been occurring as a density-dependent factor within the population; two bears were killed by other bears in 2014 (IGBST 2014). There has been an increase in home range-size as the species population grows, bears have to travel further to obtain food. The research accomplished by the IGBST has easily made the GYE grizzly bear population the most studied North American species (IGBST 2014). Grizzly bears will continue to be monitored and managed but with more authority from State and Tribal agencies. Concerns of Factor A The six recovery ecosystems of bear populations are an acceptable way to monitor the total population. However, with the movement of individual bears, it may be hard to identify total state populations at a given time (WGFD 2016). Yes, some of these bears are collared by state agencies but from experience, not every bear can and will be collared (Turnbull 2015). If the allowable number of total mortalities for independent females cannot exceed 7.6%, 15% for independent males and 7.6% for dependent young, each states harvest quota for mortality will have to continually change during the harvest season. Quotas should be established at the beginning of a hunting season and	FWS-R6-ES-2016-0042-4361	
Once you've opened the Grizzly Bear to hunting, eventually if the time comes to revoke that decision, the amount of poachers will be greater than it is today.						Factor C	It is not in the best interest of the grizzly bear to be taken off the endangered species list for many reasons. 1) The population is not spread out far enough to ensure a healthy gene pool for future generations 2) The population has grown but not to a substantial amount 2.1) The hunting of Grizzly bears will become rapidly popular and the population will not be able to keep up with demand from the hunting season. The number of deaths will be greater than births. 2.2) As a result of a population not being able to keep up the bears will shortly be put back into a dangerous number 3) Once you've opened the Grizzly Bear to hunting, eventually if the time comes to revoke that decision, the amount of poachers will be greater than it is today.	FWS-R6-ES-2016-0042-4865	
Also, even though the population is slowly growing, less than a thousand bears is not many animals. Also, the states of Wyoming, Idaho and Montana are not protecting their wild ruminant populations very well, and most are declining because of failure of the breeding age females to have viable young that survive to adulthood. A very high prevalence of newborns have developmental malformations/birth defects. Any state that allows over 50% of some wild animal populations to be born with birth defects without doing something to find and mitigate the cause can't be trusted to protect predators, especially grizzlies and wolves.						Factor C	With less food sources for grizzlies, it is not a good idea to remove the Greater Yellowstone Ecosystem Population from the Federal List of Endangered and Threatened Wildlife. Also, even though the population is slowly growing, less than a thousand bears is not many animals. Also, the states of Wyoming, Idaho and Montana are not protecting their wild ruminant populations very well, and most are declining because of failure of the breeding age females to have viable young that survive to adulthood. A very high prevalence of newborns have developmental malformations/birth defects. Any state that allows over 50% of some wild animal populations to be born with birth defects without doing something to find and mitigate the cause can't be trusted to protect predators, especially grizzlies and wolves. They even claim the wolves and grizzlies kill so many ruminant young that it causes population declines in the wild ruminant populations rather than trying to do something about the real cause of the declining ruminant populations. This is being less than truthful. It is actually the birth defects that either kill the newborn ruminants outright or make them much more susceptible to being caught by predators that are causing the low recruitment rates. I have seen no mention of the birth defects and adverse health issues on the ruminant newborns in the discussions concerning delisting of the grizzly. Has the USFWS done anything to mitigate the birth defects? If there are fewer and fewer large grazing animals for the grizzlies to eat, as well as no white-bark pine nuts or trout, it will definitely adversely affect the grizzly population and its ability to grow. The state game departments have completely ignored studies concerning the birth defects on ruminants and have consistently ignored all reports of birth defects on birds, mammals and amphibians. The agriculture departments have ignored the birth defects and health issues on domestic livestock that kill thousands each year and again the wild predators often are blamed. Since so many animals, including wolves have similar birth defects, it is possible that grizzlies also do. You should make certain that the grizzly cubs are not being similarly affected before even considering delisting. Human newborns have the same or similar birth defects and these serious health issues are increasing each year, so there is no reason to just assume that grizzly cubs are not being affected. Grizzlies eat foliage, like ruminants and they eat fruit, tubulars and meat, just like humans. Have you addressed this issue at all before recommending delisting? I am adamantly opposed to	FWS-R6-ES-2016-0042-4869	

BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. This is the kind of thing that removing Grizzlies from the Endangered List will become the norm for Montana, Wyoming and Idaho, under the guise of protecting the bears.						Factor C	In memory of Scarface, who was killed by a hunter in November, and news of his death was withheld until after the comment period to State Fish and Wildlife, and as the deadline for commenting on this Docket, I would like to add to my previous statements. Issue No. 1 - Grizzlies in the Greater Yellowstone Ecosystem continue to face catastrophic losses to several of their key food sources, such as white bark pine and cutthroat trout. The service's recent research on white bark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy white bark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals. Issue No. 2 - Grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between white bark pine productivity and grizzly bear mortality. Now that white bark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers because of natural causes and human intervention is short-sighted and unnecessary. Issue No. 3 - The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. Issue No. 4 - The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the long term. Issue No. 5 - In Wyoming, where Governor Mead has already expressed his approval of Bear Trophy Hunting, the decision of the USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuges for the bears' food sources in the heart of the ecosystem.	FWS-R6-ES-2016-0042-4878	
Despite the claims from trophy hunters and other groups that the bear population needs to be cut due to increased interaction with humans, etc, there are better ways of handling population control.						Factor C	Please do not take the yellowstone grizzly off of the endangered species list. Despite the claims from trophy hunters and other groups that the bear population needs to be cut due to increased interaction with humans, etc, there are better ways of handling population control. Furthermore, the increase in population is still unstable, and far more data is needed before bear stability can be proven to the point of de-listing. These bears are one of the primary reasons folks still protect and care for Yellowstone national park. And places like Yellowstone are some of the few remaining places for these magnificent creatures. Please do not compromise the safety of the bear populations by de-listing them.	FWS-R6-ES-2016-0042-4881	
The Service fails to fully acknowledge the scale of climate change and its effect on habitat and food sources for the GYE grizzly. Alpine regions that the army cutworm moths depend upon are shrinking, nonnative trout are encroaching on cutthroat trout, and epidemics are decimating WBP. Grizzly bears rely heavily on these three food sources, but there is little evidence to suggest that the FWS took this into account when proposing delisting. FWS relies upon the bear's ability to adapt to changing food availability as evidence of population viability. Grizzly bears do adapt to variable food availability, but food sources are becoming scarce at a horrifyingly fast pace. Climate change's effects on these sources will only hasten reduction, leaving little time for adequate adaptation from bears.						Factor C	Please see attachment. Attachments FWS comment	FWS-R6-ES-2016-0042-4891	
Given recent decreases in their food sources, and more bears wandering further in search of sustenance, I can anticipate that many of the bears in the Yellowstone system will wander at times outside of the park's boundaries. I have concern that any sport hunting which might be allowed by states after delisting (and which are already rumored to be in the works) would not only threaten the grizzly population, but could also increase the potential for conflict/threat between grizzlies and non-consumptive wildlife users, such as hikers/backpackers. If a bear were to survive or witness an encounter with a sport hunter, I worry that that bear would be more prone to perceive other humans as a threat, and therefore put people at greater risk as well.						Factor C	I am writing to respectfully share my opposition to the proposal to delist grizzlies in the Greater Yellowstone Ecosystem. I submit my comments as someone who takes an annual back country trip to another grizzly habitat, Glacier National Park in Montana, and who over the years has developed a deep appreciation for grizzlies. I also have a deep appreciation for the fact that, while generally calm, when feeling that they/their young may be threatened, they can pose a life threatening danger to hikers/backpackers or others. Given recent decreases in their food sources, and more bears wandering further in search of sustenance, I can anticipate that many of the bears in the Yellowstone system will wander at times outside of the park's boundaries. I have concern that any sport hunting which might be allowed by states after delisting (and which are already rumored to be in the works) would not only threaten the grizzly population, but could also increase the potential for conflict/threat between grizzlies and non-consumptive wildlife users, such as hikers/backpackers. If a bear were to survive or witness an encounter with a sport hunter, I worry that that bear would be more prone to perceive other humans as a threat, and therefore put people at greater risk as well. I am also concerned given how slowly grizzly bears reproduce, and the inexact science with regards to counting their population. Last year in Florida's first black bear hunt, quotas were exceeded over the first weekend of the hunt. If quotas for a grizzly hunt were accidentally exceeded, the time to rebuild the population could be significant. And from my observation with the limited sport hunting allowed of wolves, both here in my home state of Minnesota, and out west, once sport hunting starts, the appetite for it increases- regardless of if animal population numbers "support" continued hunts or not. If the FWS allows for the hunting of grizzlies, I think we need to be prepared for there to be more pressure for grizzlies to be hunted, whether or not the science would support that as a possible alternative at any given time. I also want to note the recent meta-analysis of the impact of hunting keystone predators upon their ability to best perform their vital ecological functioning, and that the environmental detriment is not simply a function of the number of animals left on the landscape, but also of the ways their behaviors are influenced by being subject to hunts (Ripple, et.al., Bioscience, 2009). In closing, I would like to add one additional matter. The USFWS says that it wants to work with Native American groups on this proposal. Over fifty native american groups have already shared that	FWS-R6-ES-2016-0042-4930	

They kill only a tiny portion of regional livestock and in any event ranchers are well-compensated for any losses by existing compensation funds.						Factor C	Grizzly bears are a critical piece of the Greater Yellowstone ecosystem and economy. They are also of significant cultural importance. Grizzlies keep ungulate and other wild herbivore populations healthy and appropriately limited and circulate nutrients into the soil. They kill only a tiny portion of regional livestock and in any event ranchers are well-compensated for any losses by existing compensation funds. These bears are considered brothers to native populations and symbolize wilderness to tourists. A naturally regulated grizzly population helps drive tourism and the wider economy at Yellowstone, Grand Teton and the surrounding region. Their continued vigorous protection is well warranted.	FWS-R6-ES-2016-0042-5000	
It has been suggested that current management actions have led to an increase in numbers of grizzly bears in the Greater Yellowstone Ecosystem (GYE). But the published Proposed Rule Document (PRD) and supporting reports state that grizzly bears remain "a "conservation-reliant" species because of their low resiliency to excessive human caused mortality." Therefore, continuation of current management practices is required to help assure a healthy population of the species in the future						Factor C	Lynthia Guerra, May 2016 Comments regarding FWS Docket ID: FWS-R6-ES-2016-0042: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife It has been suggested that current management actions have led to an increase in numbers of grizzly bears in the Greater Yellowstone Ecosystem (GYE). But the published Proposed Rule Document (PRD) and supporting reports state that grizzly bears remain "a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality." Therefore, continuation of current management practices is required to help assure a healthy population of the species in the future It is stated that bear numbers have increased in the core recovery area, but the underlying assumptions to these statements may be inherently flawed rendering these numbers inaccurate. If the assumptions in the PRD and supporting reports do not hold true in the future, grizzly populations may be adversely impacted. The prudent approach now is to maintain their current listing status. Therefore, I oppose delisting of GYE grizzly bears under management conditions as described in the current FWS PRD and Conservation Strategy. Uncertainties about bear demographics and increasing human activity (including hunting) require a more conservative approach than outlined in the PRD. Established recovery strategies and criteria should be retained or even strengthened, with continuing effort to reduce human activity that either damages habitat or invites the greatest risk of human-bear conflict which leads to bear mortality. The PRD does not demonstrate adequately that the scientific modeling or the underling assumptions to population statistics are robust and will result in appropriate management measures to ensure the success of the GYE grizzly population. I am distressed that FWS expresses confidence in predicting how many "extra" female and male bears that each year will available for trophy hunting. Some of these annual predictions are very low numbers (less than 5). It is unfathomable that a natural resource agency would ever declare any number of bears less than 5 as "extra" and appropriate for trophy hunting. Given the uncertainty, there should be no "discretionary" bear mortality within the PCA. Current efforts to recover the population of the GYE bears need to continue. Maintenance or even growth of that population should be the primary goal. Grizzly bear populations are an important part of our nation's shared	FWS-R6-ES-2016-0042-5529	
The Service continues to work with the state and federal agencies involved, it must prioritize the following:- Continued and enhanced efforts to minimize conflicts between grizzly bears and people, thereby improving social tolerance and public acceptance for the bears throughout their range.						Factor C	~~Docket No. FWS-R6-ES-2016-0042, Re: Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. The historic comeback of the Yellowstone grizzly bear population is truly a remarkable achievement. But the current proposal threatens progress made to date. The Service is rushing to delist the grizzly bear before it knows how the Northern Rockies states and other federal agencies plan to manage it. It is unacceptable to proceed with delisting when the state and federal plans governing how this population will be managed are incomplete and therefore, unenforceable. Further, the Service's current proposal doesn't provide grizzlies with enough protections to ensure their long-term recovery. We can't afford to be careless with this species. There is no need to rush this process, but that's exactly what the Service appears to be doing. I call on the Service to put the proposed delisting rule on hold for the following reasons: 1) The Service needs to strengthen habitat protections and mortality limits in the proposed rule. 2) State and federal management plans detailing how this population will be managed are incomplete and must be updated to provide enforceable protections. 3) The Service must rectify inconsistencies that currently exist in the set of documents (the proposed rule, the recovery plan, and the conservation strategy) detailing how this population will be managed post-delisting. The Service continues to work with the state and federal agencies involved, it must prioritize the following: -Strong protections for the core population and habitat. -Restored connectivity with other grizzly bear populations by protecting bears in areas important to connectivity, allowing the population to continue to expand and securing habitat on public lands in between populations. -Continued and enhanced efforts to minimize conflicts between grizzly bears and people, thereby improving social tolerance and public acceptance for the bears throughout their range. -Adequate funding to support ongoing grizzly bear recovery. Idaho, Montana and Wyoming's state grizzly bear management plans must be revised to provide "adequate regulatory mechanisms" to conserve the species - a requirement of the Endangered Species Act. Wyoming has yet to finalize a revised grizzly bear state management plan, and the draft is not in line with important details of the Service's delisting proposal. Idaho and Montana have not yet set a public timeline for revision or allow for public review of revisions to their grizzly~~	FWS-R6-ES-2016-0042-5524	

Uncertainties about bear demographics and increasing human activity (including hunting) require a more conservative approach than outlined in the PRD. Established recovery strategies and criteria should be retained or even strengthened, with continuing effort to reduce human activity that either damages habitat or invites the greatest risk of human-bear conflict which leads to bear mortality. The PRD does not demonstrate adequately that the scientific modeling or the underlying assumptions to population statistics are robust and will result in appropriate management measures to ensure the success of the GYE grizzly population. I am distressed that FWS expresses confidence in predicting how many "extra" female and male bears that each year will be available for trophy hunting. Some of these annual predictions are very low numbers (less than 5). It is unfathomable that a natural resource agency would ever declare any number of bears less than 5 as "extra" and appropriate for trophy hunting. Given the uncertainty, there should be no "discretionary" bear mortality within the PCA.						Factor C	Lyntina Guerra, May 2016 Comments regarding FWS Docket ID: FWS-R6-ES-2016-0042: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. It has been suggested that current management actions have led to an increase in numbers of grizzly bears in the Greater Yellowstone Ecosystem (GYE). But the published Proposed Rule Document (PRD) and supporting reports state that grizzly bears remain "a conservation-reliant" species because of their low resiliency to excessive human-caused mortality." Therefore, continuation of current management practices is required to help assure a healthy population of the species in the future. It is stated that bear numbers have increased in the core recovery area, but the underlying assumptions to these statements may be inherently flawed rendering these numbers inaccurate. If the assumptions in the PRD and supporting reports do not hold true in the future, grizzly populations may be adversely impacted. The prudent approach now is to maintain their current listing status. Therefore, I oppose delisting of GYE grizzly bears under management conditions as described in the current FWS PRD and Conservation Strategy. Uncertainties about bear demographics and increasing human activity (including hunting) require a more conservative approach than outlined in the PRD. Established recovery strategies and criteria should be retained or even strengthened, with continuing effort to reduce human activity that either damages habitat or invites the greatest risk of human-bear conflict which leads to bear mortality. The PRD does not demonstrate adequately that the scientific modeling or the underlying assumptions to population statistics are robust and will result in appropriate management measures to ensure the success of the GYE grizzly population. I am distressed that FWS expresses confidence in predicting how many "extra" female and male bears that each year will be available for trophy hunting. Some of these annual predictions are very low numbers (less than 5). It is unfathomable that a natural resource agency would ever declare any number of bears less than 5 as "extra" and appropriate for trophy hunting. Given the uncertainty, there should be no "discretionary" bear mortality within the PCA. Current efforts to recover the population of the GYE bears need to continue. Maintenance or even growth of that population should be the primary goal. Grizzly bear populations are an important part of our nation's shared natural heritage. I urge you to reject delisting.	FWS-R6-ES-2016-0042-5529	
For me the most distressing fact is that the surrounding states are so eager to hold trophy hunting seasons...even when 60-90 bears died due to human causes last year. That may be as much as 10% of the population. Adding a trophy hunt on top of that would be unsustainable. I for one believe that some animals should be managed and protected for their own intrinsic worth...not merely to serve as a cash-generating trophy.						Factor C	I am writing to urge you to not remove Yellowstone's grizzly bears from the Endangered Species List. I live, recreate and work in the Greater Yellowstone Ecosystem...or in other words grizzly country. My daily experiences support the fact that the grizzly population has indeed greatly increased. But these experiences also highlight the fact that the grizzly faces an uncertain and precarious future. Many of their prime food sources are facing serious threats from climate change, other predators, loss of wilderness and encroachment by human development. And as the numbers of people surrounding and visiting a Yellowstone and Grand Teton National Parks swell, more and more encounters result in more and more dead beats. For me the most distressing fact is that the surrounding states are so eager to hold trophy hunting seasons...even when 60-90 bears died due to human causes last year. That may be as much as 10% of the population. Adding a trophy hunt on top of that would be unsustainable. I for one believe that some animals should be managed and protected for their own intrinsic worth...not merely to serve as a cash-generating trophy. However this non-hunting-centric view of conservation and wildlife management holds little to no sway with the states who you would entrust with the bears' future. Their philosophy, funding and worldview is driven by a small section of the nation...hunters. And this means they view the bears' very existence as based in serving as game. Chris Servheen is right that the recovery of the grizzly is a tremendous success. But let's not hand that success off until its future is known to be secure. Let's not hand that future over to the states until their wildlife departments move away from a foundation built upon harvesting our wildlife to one more in line with what the federal government has relied on to protect Grizzlies for the past four decades. Let's not gamble on the bears' future until we know how they will respond to a changing landscape, until we can support increased awareness about living with bears and until we can ensure that humanity doesn't ultimately crush the wild out of this precious ecosystem. Please continue to protect the grizzly!	FWS-R6-ES-2016-0042-5570	

Why can't the USFWS place more resources towards colonization by grizzlies into all suitable habitat within the GYE, primarily working on reducing human-bear conflicts in areas where bears have not existed for the past 50+ years? Again, I would delay delisting until a viable population is established in the Bitterroot- Selway ecosystem in west central Idaho either through natural immigration or translocation.						Factor C	I oppose the delisting of <i>Ursus arctos horribilis</i> in the GYE ecosystem by the USFWS for some of the following reasons: 1. Politics vs Science It appears as though current grizzly bear population estimates in the GYE are made with political expediency in mind. For example, Idaho Fish and Game claim the GYE grizzly population exceeds 1,000 bears while the USFWS claims about 760 bears currently reside in the GYE. This amounts to a 24% disparity between agencies. This, of course, does not meet scientific scrutiny. 2. I would like to see cross scientific methods used to establish the current population in the GYE in order to improve the accuracy of the count. Use a DNA rub study in conjunction with radio collaring, field observation and spatial habitat modeling and analysis as was done in the NCDE recently. I know that there were overtures made to the IGBST to conduct a DNA rub analysis in the GYE a few years back which was meant with vehement resistance. 3. Historically, the states of Wyoming, Montana and especially Idaho have done a very poor job in protecting this iconic species. Before the ESA was enacted and implemented in 1974, the grizzly bear population in the GYE was under 200 and certainly headed towards extirpation without the timely intervention and sound recovery plan of the USFWS. If delisting occurs, what's to prevent the states involved from botching the current success achieved by the federal agency. 4. Knowing that the grizzly has one of the lowest reproductive rates and a cub of the year mortality rate of 50%, there is very little room for error. 5. Why can't the USFWS place more resources towards colonization by grizzlies into all suitable habitat within the GYE, primarily working on reducing human-bear conflicts in areas where bears have not existed for the past 50+ years? Again, I would delay delisting until a viable population is established in the Bitterroot- Selway ecosystem in west central Idaho either through natural immigration or translocation.	FWS-R6-ES-2016-0042-5574	
Currently, ranchers and farmers are compensated for the loss of domesticated animals by Yellowstone Bears. While some ranchers are working out their differences peaceably with grizzly bears, others are not. For that reason, federal oversight is still necessary.						Factor C	To Secretary of the Interior Mr. Sally Jewell, I am writing to you about the issue of the U.S. Fish and Game Department's decision to remove the Yellowstone Grizzly Bear aka Brown Bear off the Federal Endangered Species Protection list. This is a complex issue as are the consequences of this amazing animal losing their endangered protection. The final answer as to why the Yellowstone Grizzly should not be removed is clearly because the species is not recovered. Instead of delisting, with all the time, money, and effort spent to bring back the bear from extinction, more money and time needs to be spent educating the growing human population on living in bear territory. Currently, the #1 cause of bear mortality still stems from conflicts with people. A secondary unforeseen problem that has reared its ugly head in recent years is the misinformation campaign of certain US agencies as well as one sided mainstream media stories. For example, government agencies and U.S. newspaper articles have claimed that the Yellowstone Bear population has increased and even doubled since the last time the US Fish and Game tried to remove the bear in 2006. In dissent of this opinion, a recent annual report compiled by Dr. David Mattson from the Interagency Grizzly Bear Study Team concludes that the Yellowstone Grizzly population has not only not grown since 2002, it has actually declined since 2007. This effort to misinform the public is both disturbing and problematic because the American people are not getting the truth. Let it be known that I wish to only focus on a few important points in this letter as opposed to the many reasons as to why delisting the Yellowstone Bear is the wrong move at this time. Female bears if healthy only have litters about every 3 years and do not reproduce easily. The Yellowstone Bear population has been isolated for over 100 years and some evidence suggests that the population is suffering from the effects of inbreeding. The Brown Bear currently occupies about 1% of their historic range prior to Europeans settling the United States. While there is available habitat suitable for Brown Bears that could be used to connect the few remaining populations in the lower 48 states, the current plan calls for flying or driving male brown bears to Yellowstone in order to mate and improve their genetic diversity. Again, this is a wrong-headed move unless given no other choice to sustain a healthy population. Currently, ranchers and farmers are compensated for the loss of domesticated animals by Yellowstone Bears. While some ranchers are working out their differences peaceably with grizzly bears, others are not. For that reason,	FWS-R6-ES-2016-0042-0008	

In the face of an unraveling ecosystem, bears have been turning to the dangerous practice of eating more meat. Unsustainable numbers of bears are being killed as result of conflicts with incautious big game hunters and ranchers. More needs to be done to reduce conflicts, not less.						Factor C	To Secretary of the Interior Ms. Sally Jewell, I am writing to you about the issue of the U.S. Fish and Game Department's decision to remove the Yellowstone Grizzly Bear aka Brown Bear off the Federal Endangered Species Protection list. This is a complex issue as are the consequences of this amazing animal losing their endangered protection. The final answer as to why the Yellowstone Grizzly should not be removed is clearly because the species is not recovered. Instead of delisting, with all the time, money, and effort spent to bring back the bear from extinction, more money and time needs to be spent educating the growing human population on living in bear territory. Currently, the #1 cause of bear mortality still stems from conflicts with people. A secondary unforeseen problem that has reared its ugly head in recent years is the misinformation campaign of certain US agencies as well as one sided mainstream media stories. For example, government agencies and U.S. newspaper articles have claimed that the Yellowstone Bear population has increased and even doubled since the last time the US Fish and Game tried to remove the bear in 2006. In dissent of this opinion, a recent annual report compiled by Dr. David Mattson from the Interagency Grizzly Bear Study Team concludes that the Yellowstone Grizzly population has not only not grown since 2002, it has actually declined since 2007. This effort to misinform the public is both disturbing and problematic because the American people are not getting the truth. Let it be known that I wish to only focus on a few important points in this letter as opposed to the many reasons as to why delisting the Yellowstone Bear is the wrong move at this time. Female bears if healthy only have litters about every 3 years and do not reproduce easily. The Yellowstone Bear population has been isolated for over 100 years and some evidence suggests that the population is suffering from the effects of inbreeding. The Brown Bear currently occupies about 1% of their historic range prior to Europeans settling the United States. While there is available habitat suitable for Brown Bears that could be used to connect the few remaining populations in the lower 48 states, the current plan calls for flying or driving male brown bears to Yellowstone in order to mate and improve their genetic diversity. Again, this is a wrong-headed move unless given no other choice to sustain a healthy population. Currently, ranchers and farmers are compensated for the loss of domesticated animals by Yellowstone Bears. While some ranchers are working out their differences peacefully with grizzly bears, others are not. For that reason	FWS-R6-ES-2016-0042-0008	
The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies.						Factor C	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	

These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country.						Factor C	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	
Recent research has suggested that bears are compensating for the loss of those food sources by relying more heavily on meat. Much of this increase in meat comes in the form of livestock depredation and scavenging hunter-killed animals; two behaviors that often result in the death of the bear. Delisting the bear now will only increase the number of dead bears.						Factor C	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	

Trigger Text	Subcode 1	Subcode 2	Code(s)	Full Comment Text	Form Letter/Document ID
If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts			Factor D	Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities. Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 -- and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears. - - The plan presents a potentially tremendous setback. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - - Yellowstone's bears have also long been isolated from other bear populations, forcing the government to keep them on permanent life support by proposing to truck in bears to avoid health issues caused by inbreeding. This fact further highlights the need for recovering grizzlies in more places. - - I am asking the Service to maintain protections for Yellowstone grizzly bears. If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD
As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed.			Factor D	Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities. Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 -- and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears. - - The plan presents a potentially tremendous setback. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - - Yellowstone's bears have also long been isolated from other bear populations, forcing the government to keep them on permanent life support by proposing to truck in bears to avoid health issues caused by inbreeding. This fact further highlights the need for recovering grizzlies in more places. - - I am asking the Service to maintain protections for Yellowstone grizzly bears. If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD
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Without some assurance that surrounding states can protect bears that attempt to disperse, should ESA restrictions be lifted, this listing should be maintained	906		Factor D	I am writing to urge you to maintain federal ESA listing for grizzly bears in the Greater Yellowstone Ecosystem (GYE) -- a high-profile population that we as a nation have invested in since 1975. The FWS estimates a GYE grizzly population of about 700 animals, but this is the census size (N). The science of conservation genetics (in which I have some expertise) tell us that the most important number is not N, but rather the "effective population size" (Ne) - basically the number of individuals that successfully reproduce each generation. Depending on the sex ratio and age structure of sexually mature individuals, the number of breeding adults will be LOWER to FAR LOWER than the census size, and in terms of genetic health and long-term viability of a population, THIS IS WHAT COUNTS. (We have learned this the hard way with the Florida Cougar!). Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. - - Despite positive demographic trends since ESA listing of the GYE grizzlies, this population remains severely isolated, which will jeopardize the long-term viability of this population until some connectivity can be established with other populations. Without some assurance that surrounding states can protect bears that attempt to disperse, should ESA restrictions be lifted, this listing should be maintained. Artificially moving GYE bears to other populations (Northern Rockies) and vice-versa may be necessary in the short term, but this amounts to "ecologically baby-sitting" and is not a long term strategy. Corridors must be developed and then maintained long enough to document successful dispersal and reproduction by bears into and out of the GYE, and then delisting would be justified. I hope you will reconsider the delisting proposal and keep the GYE bears protected until they can become part of a larger meta-population group. - - Sincerely,	CBD
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There is absolutely no chance the states of Idaho, Montana and Wyoming can be trusted to properly manage these iconic and treasured animals -- see their disastrous plans for gray wolves for just a hint of what's to come -- and the federal government should not abdicate its responsibility to protect them for those of us living today and the generations to come.			Factor D	I want to register my opposition to the proposal to remove the grizzly bears of the Greater Yellowstone Ecosystem from the Endangered Species list. There is absolutely no chance the states of Idaho, Montana and Wyoming can be trusted to properly manage these iconic and treasured animals -- see their disastrous plans for gray wolves for just a hint of what's to come -- and the federal government should not abdicate its responsibility to protect them for those of us living today and the generations to come. - - Grizzlies need more of our help to survive and thrive in this environment -- and with climate change affecting everything on the planet -- this is very bad timing, indeed. Save the bears! - - Sincerely, - Christine Sanborn - Camarillo, CA (former Wyoming resident)	CBD

Delisting has been a complete disaster for wolves everywhere it has happened. Please don't send bears or any other species down that same path			Factor D	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been an Endangered Species Act success story so far, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€”they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Delisting has been a complete disaster for wolves everywhere it has happened. Please don't send bears or any other species down that same path. Grizzly bears are an iconic animal in Westâ€”they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition
know for a fact that in regard to the McKittrick Policy and no real prosecution of self-defense cases by USFWS and the three states WY, Montana and ID that the regulations presently in place to protect the Grizzly Bear are inadequate and there is in fact no team of prosecutors or forensic investigators state or federal with training, experience and laws in place to ensure Grizzly Bear Conservation.			Factor D	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€”they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in Westâ€”they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. I know for a fact that in regard to the McKittrick Policy and no real prosecution of self-defense cases by USFWS and the three states WY, Montana and ID that the regulations presently in place to protect the Grizzly Bear are inadequate and there is in fact no team of prosecutors or forensic investigators state or federal with training, experience and laws in place to ensure Grizzly Bear Conservation. At present a hunter has no legal deterrent to back up slowly, it is shoot first and figure out the story later. That is not conservation it is slaughter. I have read all IGBST mortality reports since 1988 have you. If so what have you learned. Incorporate that into your Plan. Thank you. Sincerely,	Endangered Species Coalition
First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and x in place			Factor D	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involve -----If delisted bears will unnecessarily die. Killing should not be recreation for people-other animals do it to survive but we are the only ones who kill for the entertainment of it. There is no reason to kill bears-it is not they who are overpopulated and like all other beings they have a role in nature. To kill bears is to upset the balance that nature strives to maintain even further. Leave the bears alone I ask of you. The do not deserve to die for the wants of people. we should be learning bout them and living with them instead of murdering them.--- The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC

As a visitor to Grizzly country for many years, I am saddened, bewildered, and angered by the fractured proposals for these animals. The Grizzly population has surely increased over the years, but it is still in need of protection. Their food sources have been severely cut back, and after talking to the many people I have contact with within Griz regions, I know that many hunters just can't wait to kill them. They are salivating to kill the Grizzly, and strict and enforceable regulations are not in place. The Grizzly populations are not able to withstand these mental attitudes. It seems as though government agencies set up to protect the Grizzly are doing just the opposite			Factor D	Please accept my comments on the proposed delisting rule. As a visitor to Grizzly country for many years, I am saddened, bewildered, and angered by the fractured proposals for these animals. The Grizzly population has surely increased over the years, but it is still in need of protection. Their food sources have been severely cut back, and after talking to the many people I have contact with within Griz regions, I know that many hunters just can't wait to kill them. They are salivating to kill the Grizzly, and strict and enforceable regulations are not in place. The Grizzly populations are not able to withstand these mental attitudes. It seems as though government agencies set up to protect the Grizzly are doing just the opposite. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC
Dear Service Please slow this down and consider the State's Plans Positions first! Those must be "in place" or wanton slaying of these great bears is a real possibility. Then....review this once it is assured that the bears are "safe". I am a hunter but these bears are NOT Trophy animals. They are simply too rare. Too easily hunted and killed. They have lost the fear of the human in too many cases. Given the lack of Funds for all your Work, in general, where will the dollars come from to Monitor and Police the States? Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better. Thanks for reading this.			Factor D		GYC
It is obvious that the grizzly bear delisting proposal is totally unscientific! It is done in a sloppy way, and is far too important to go forward when basic data is not available or not in relevant form. 1) state grizzly bear management plans need to be updated. 2) National forests need to amend their plans to protect the places where bears live. 3) Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Also, delisting means that grizzlies will be hunted and wiped out in Idaho, Montana, and Wyoming.			Factor D	It is obvious that the grizzly bear delisting proposal is totally unscientific! It is done in a sloppy way, and is far too important to go forward when basic data is not available or not in relevant form. 1) state grizzly bear management plans need to be updated. 2) National forests need to amend their plans to protect the places where bears live. 3) Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Also, delisting means that grizzlies will be hunted and wiped out in Idaho, Montana, and Wyoming. That is completely counter to what we, the American Public want on the public lands we own. We completely oppose grizzly bear hunting - the bears are majestic, awe-inspiring symbols of the wild, not trophies. And from a tourism perspective, bears are worth more alive than dead. Taken together, the states' Bear Management Plans are not coordinated and not updated. 1) Wyoming's Plan violates federal law in proposing to assume authority on private land in-holdings within park boundaries. 2) Montana's plan doesn't commit to allowing separate bear populations to connect with each other. 3) Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Where is the funding for all this? State bear management plans for maintaining a healthy grizzly bear population need to show how the updated plans will be paid for!! To summarize the important points -- 1) Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. 2) Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. 3) Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. Until the Park Service promises to fulfill these basic tools for healthy bear management, we and the American Public cannot support any delisting proposal, period!!	GYC

The states of Wyoming, Idaho and Montana must not be given control of grizzly bears' fate. They have shown their desire to put sportsmen's interests ahead of the interests of wildlife in their handling of the wolves in their states. Grizzlies have a very slow reproductive process which hinders their ability to come back from population losses such as would take place if federal protections are lifted. In addition, they have suffered a loss of one of their major food sources, white pine nuts, which further endangers them. The successful comeback of grizzly bears is not complete. Do not rush to delist them. Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. 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I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.			Factor D	The states of Wyoming, Idaho and Montana must not be given control of grizzly bears' fate. They have shown their desire to put sportsmen's interests ahead of the interests of wildlife in their handling of the wolves in their states. Grizzlies have a very slow reproductive process which hinders their ability to come back from population losses such as would take place if federal protections are lifted. In addition, they have suffered a loss of one of their major food sources, white pine nuts, which further endangers them. The successful comeback of grizzly bears is not complete. Do not rush to delist them. Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC
Wyoming wants to assume authority on private land in-holdings within park boundaries, in violation of federal law.			Factor D	I own properties and run businesses in Montana, Idaho and California. I see first-hand the bad behaviors of many in these states, related to wild animals especially predators. I am also an accomplished wildlife photographer, backpacker, tent campers, with experience "up close and personal" with grizzlies/brown bears in Alaska, with photos to show and stories to tell - truthful ones - of safe close encounters. I am happy to offer consulting experience on this, pro-bono. I have owned my home and run a business in Idaho for 20 years. I know first-hand the mentality of some of the ruthless, misinformed, greedy, and just plain ignorant in this state. There are many good folks there, too, but the bad guys continue to put out lots of mis-information about grizzlies and other large predators (e.g., wolves) to perpetuate irrational fear and resulting bad behaviors. Please consider my comments on the proposed delisting rule, about which I have significant concerns: First, the proposed rule should be put on hold. We need first to clearly and completely define all the interrelated elements and impacts - with key details - of such proposal, so we can know the whole Big picture, including all possible (and likely) impacts and intelligent ways to mitigate negative ones. The current proposal is flawed, apparently from a messy, uncoordinated effort - very unprofessional. Before the Service takes another step down its delisting road, it should make sure that ALL related pieces are ready and in place. State grizzly bear management plans need to be updated. Especially suspect are those in Wyoming, Idaho, and Montana. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on all our public lands managed by Bureau of Land Management and/or the National Park Service. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. It is murder to kill them for fun. Killing anything for fun is murder and just plain wrong. "Trophy hunting" is wrong, outdated, selfish, cruel, and based on ignorance or stupidity or both. It is quite different from responsible hunting for food; good hunters-for-food support sustainability of wildlife habitats and populations and generally do not seek to torture their prey. We should not support or applaud or teach our kids such selfish and cruel behavior as trophy hunting in the 21st century. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land in-holdings within park boundaries, in violation of federal law. THIS IS WRONG. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Our country has always had factions against national public lands, including national parks. Yet such parks have been one of our "best ideas" ever. They attract not only our citizens but people from all over the world - bringing \$ to planet earth resources continue to be irrationally and selfishly depleted by many (in unsustainable ways), there is increasing pressure by the greedy to attack, rape and pillage our parks and other public lands. We must remain steadfast in supporting such places on behalf of the MAJORITY of U.S. citizens and humans and for all future generations. We've seen the reaction to delisting the wolves in these states. The process was badly done and has led to terrible and cruel killings in Idaho. Some killers	GYC
I'd like the Service needs to make sure that Idaho, Montana and Wyoming's bear management plans are consistent with each other. Currently, Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law; Montana's plan doesn't commit to allowing separate bear populations to connect with each other; and Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population.			Factor D	It has come to my attention that the US Fish and Wildlife Service is trying to put in place a proposed rule to de-list Grizzly bears without first ensuring that state Grizzly bear management plans are updated, National forests amend their plans to protect where Grizzlies live, and the Bureau of Land Management has a plan for protecting Grizzly habitat on our public lands. The management term for such a plan would be "ass-backward". (Seriously! Look it up.) It would be much easier for me to understand the rationale for de-listing Grizzlies if I understood the FULL ramifications of that de-listing, rather than getting information piecemeal, as it's being put together. Please reconsider your approach to de-listing Grizzlies. If nothing else, the Service needs to declare a hunting moratorium BEFORE Grizzlies are de-listed. Three states (Idaho, Montana, and Wyoming) are planning to hunt bears once they're delisted. What is the purpose of hunting bears in this day and age? At the very very least, I'd like the Service needs to make sure that Idaho, Montana and Wyoming's bear management plans are consistent with each other. Currently, Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law; Montana's plan doesn't commit to allowing separate bear populations to connect with each other; and Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. I hope you change the proposed plan for the better.	GYC

Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved.			Factor D	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states – Idaho, Montana, and Wyoming – are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC
Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population.			Factor D	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states – Idaho, Montana, and Wyoming – are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC
There are laws in place to handle bears that interfere with ranchers. There is no need, nor are there enough bears, to permit the lifting of their protection.			Factor D	I care! There are laws in place to handle bears that interfere with ranchers. There is no need, nor are there enough bears, to permit the lifting of their protection. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition
The states surrounding Yellowstone (Montana, Wyoming and especially Idaho) have shown with wolves that they will kill all predators, allowing horribly cruel methods and ignoring scientific evidence (and in Idaho's case even illegally collaring wolves in a wilderness area!)			Factor D	A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Your de-listing proposal does not take into account the ongoing and very real effects of global warming - the grizzlies have lost most their pine-nuts, a major food source gone. Grizzly bears are far from recovered and need to maintain their ESA protections. The states surrounding Yellowstone (Montana, Wyoming and especially Idaho) have shown with wolves that they will kill all predators, allowing horribly cruel methods and ignoring scientific evidence (and in Idaho's case even illegally collaring wolves in a wilderness area!). Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition
Please do not leave the future of these magnificent creatures in the hands of individual states- they need to keep their Endangered Species Act protections			Factor D	Please do not leave the future of these magnificent creatures in the hands of individual states- they need to keep their Endangered Species Act protections! I am sick of seeing states wipe out predator populations on behalf of hunters, ranchers and other special interest groups. We must end the leasing public lands. If you want to see how upset people are when it comes to state wildlife practices, look at reactions to the recent murders of the wolves in Oregon. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition

Further, the results of wolf management in the very states where grizzly delisting is being proposed shows the states are not responsibly managing animals given to their care and likely will need to be relisted in short order.			Factor D	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Further, the results of wolf management in the very states where grizzly delisting is being proposed shows the states are not responsibly managing animals given to their care and likely will need to be relisted in short order. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition
They are not recovered enough to all more recovery. States have proven they are not qualified to manage wildlife. Wyoming and Montana wildlife services are notorious in killing bears, mountain lions, etc instead of relocating to better areas.			Factor D	It is the responsibility of U.S. Fish and Wildlife Service to protect our wildlife..NOT to decimate them for someone to hang their heads on their walls. Please, Please continue to protect Grizzly Bears. They are not recovered enough to all more recovery. States have proven they are not qualified to manage wildlife. Wyoming and Montana wildlife services are notorious in killing bears, mountain lions, etc instead of relocating to better areas. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition
Montana, Idaho and Wyoming have already proven they are not good stewards towards the great predators.			Factor D	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. Montana, Idaho and Wyoming have already proven they are not good stewards towards the great predators. To unlist the grizzly would be their death call.	Humane Society Petition
The states can not be trusted to follow USFWS management prescriptions without diligent monitoring and enforcement actions on your agency's part!			Factor D	Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. As a Professor Emeritus of Zoology and Environmental Science, I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. The states can not be trusted to follow USFWS management prescriptions without diligent monitoring and enforcement actions on your agency's part! Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Thank you for your attention to my comments!	NPCA
Surrounding Yellowstone are three states that have great difficulty regarding migratory habits and needs of protected wildlife.			Factor D	Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule. Surrounding Yellowstone are three states that have great difficulty regarding migratory habits and needs of protected wildlife. Thus I am asking that you take the following steps before finalizing it: Ensure that significant buffer zones outside of the Park are provided with NO HUNTING or CULLING permitted; infractions of which have serious penalties attached. * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Thanks again for considering my comments.	NPCA

I also know that the states involved are fully capable of managing the bears without risk of taking a step backward in terms of maintaining a viable population in the Yellowstone ecosystem or achieving recovery in other ecosystems.			Factor D	I fully support removing the greater Yellowstone ecosystem population of grizzly bears from the list for both practical reasons of coexisting with bears and from a biological standpoint. Without going in to regurgitating data to support my statement I will just say I know that the professional biologists from USFWS would not make such a proposal if there were not sufficient evidence to warrant doing so. I also know that the states involved are fully capable of managing the bears without risk of taking a step backward in terms of maintaining a viable population in the Yellowstone ecosystem or achieving recovery in other ecosystems. As far as concerns about the bears becoming genetically isolated first of all I would point out that a slight reduction of bears (if there even is) within the Yellowstone ecosystem is not going to have any affect. I would think genetic diversity within the Yellowstone ecosystem relies on transient animals from other ecosystems arriving in the Yellowstone ecosystem, keeping in mind that these transient animals will still be fully protected until their arrival I believe the delisting would have almost no affect in this regard. Having lived in close proximity to grizzlies from other ecosystems all my life I find it abundantly evident that they are recovering and dispersing and have no doubts genetic diversity is not in any danger from the proposed rule, if anything perhaps a slight reduction in the Yellowstone population may be beneficial in this regard as it would make room for transient animals to establish territories and eventually interbreed with the existing population. Knowing many people who live and recreate in the Yellowstone ecosystem I am shocked at how many tell me about frequent encounters with these bears. I am convinced the reason that the bears so commonly show little or no fear of humans is that management policies have prohibited people from engaging in activities which discourage bears from interaction with humans, including defense of life and property in all but the most dire of circumstances. Bears are very capable of learning from their experiences and I believe their behavior will change in a positive way resulting in less conflict if the proposed rule is adapted, this will be good for the bears in the long term, if it sows teach their young to avoid humans rather than being indifferent to them, or worse yet seeking them out, more cubs will survive. While on the subject of cub survival I would also like to point out that if regulated hunting was established in any portion of the ecosystem it also has the potential of benefiting overall cub survival rates as well by reducing the number of mature bears which are known to kill cubs given the opportunity, in addition to helping restore a healthy fear of humans in all the bears. In reality state regulated hunting would provide funds for conservation efforts and create a better public perception of the bears as well as state and federal management agencies within the communities directly affected. Financially the proposed rule has many benefits both for government agencies as well as citizens. Federal managers would no longer be tasked with providing protection to a population segment that quite frankly has no more room to grow. State managers would no longer be tasked with monitoring a population they are forbidden from managing as a resource. Private citizens could potentially benefit in many ways including less loss of personal property and perhaps even revenue generated by regulated hunting. I believe that regardless of what biological evidence is produced to show that the recovery has been successful there will always be a certain group of activist minded people and organizations who will oppose delisting. This can be clearly seen when looking at recent efforts by activist groups on behalf of the delisting of Grizzly bears on the following grounds: - The population gene pool is too small and compromised. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? - Bears are facing an uncertain future. Last year alone 42 bears were killed in conflict, most of which were food related deaths.	FWS-R6-ES-2016-0042-0075
Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range Å			Factor D	Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range Å	FWS-R6-ES-2016-0042-0320
Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable.			Factor D	We have lived, worked and recreated in the Greater Yellowstone Ecosystem (GYE) for almost 40 years, meeting working in Yel lowstone National Park. We have explored by foot thousands of miles of trails into some of the most breathtaking landscapes on earth, filled with the suite of native wildlife that we so love and respect. We have seen many grizzly bears over the decades and no animal is more powerful in the public's sensibility than the Great Bear. It is our state animal, picked by Montana school children. Our native tribes greatly value the grizzly bear as do all of us who value our wild places and wildlife. The grizzly bear is greater than life; it represents all that we as a people almost lost and what we have preserved. We value our large predators, our carnivores, because they remind us that we share life together in this time and place. They represent the wilderness we almost lost. We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best: Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data. Because the ecosystem is becoming stressed by climate change causing dramatic changes in food supplies needed. Because all foods are not equal. Because grizzlies are being killed at a rate the slowly-reproducing animals cannot tolerate long-term; since 2002 the population has probably declined. Because connectivity with other bears depends upon GYE grizzlies roaming and hunting would preclude that. Because human caused mortality is mostly avoidable and prevention is not stressed enough. Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable. Because sport trophy hunting of grizzly bears would be abhorrent and would reverse recovery. Because tolerant bears that people see around the parks would be the first killed. Because wildlife watchers are ignored by state wildlife agencies and the USFWS. Just look at wolf and bison management. Because tribal interests are ignored by state wildlife agencies. Because wildlife watching brings in far more economically than does hunting in GYE states. Because listing the grizzly as a distinct population segment (DPS) is possibly illegal, because it precludes the bears seeking connectivity. Because the GYE grizzly bear lives on an ecological island. Because politics trumps science every time. We love our grizzly bears and want them protected from nefarious forces bent upon hunting them. USFWS should listen to the public's concerns, listen to opposing scientists and do the right thing. Do not delist the grizzly bear.	FWS-R6-ES-2016-0042-0422

4. Delisting relies on habitat management plans which are not yet in place. x The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. x Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding.			Factor D I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear.No one knows where the additional monies will come from to pay for implementation of the delisting plan. 8. The Wyoming plan will result in the decline of the grizzly bear population.	FWS-R6-ES-2016-0042-0456
8. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. This means that the estimates of current population growth rates in the delisting plan will no longer apply after delisting.			Factor D I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear.No one knows where the additional monies will come from to pay for implementation of the delisting plan. 8. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually.	FWS-R6-ES-2016-0042-0456

9. The US Fish and Wildlife Service and the State of Wyoming appear to condone Wyoming county laws prohibiting bears within their borders. Four counties in Wyoming have passed laws barring bears within their borders. Recovery goals cannot be achieved if these counties implement their laws as they intend.			Factor D I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear. No one knows where the additional monies will come from to pay for implementation of the delisting plan. 8. The Wyoming plan will result in the decline of the grizzly bear	FWS-R6-ES-2016-0042-0456
As a resident of Wyoming, I see that Wyoming Game & Fish Department has these problems: (1) a high intolerance of predatory wildlife, as we see in their endorsement of not protecting wolves in most of the state, and trying to aim for the near-minimum number of wolves in the trophy hunting zone. (2) chronic problems maintaining some species that WGFD issues licenses for, including mule deer and moose, whose numbers have dropped sharply, while elk are maintained due to being fed through the winter on feed grounds which is headed for big problems with chronic wasting disease. (3) much political interference by politicians who dislike native predators. (4) livestock are more highly valued than bears, as we see in the large number of bears killed or moved each year to protect privately owned cattle and sheep grazed on our public lands.			Factor D Removing grizzly bears from the Greater Yellowstone Ecosystem from the protection of the Endangered Species Act at this time would be an enormous mistake. Threats to the species are increasing, not decreasing. Increasing numbers of people are living in and visiting the GYE, and some are pursuing more radically disruptive activities. Scientists and managers are just starting to get a handle on climate change and what it will mean for this area and wildlife. Fish & Wildlife Service's opinion that climate change is no problem for grizzly bears is just not credible. There is much uncertainty about the future of important grizzly bear foods. As a pilot, flying professionally and recreationally in the GYE since the late 1980s, I have witnessed the rapid death of huge swaths of forests in the mountains, including most of the old whitebark pine stands that produced most of the pine seeds. The loss of this important bear food will take a long time to manifest itself fully or even to be understood, particularly if the other most important foods are reduced by climate change or other factors. Elk numbers could decline sharply if chronic wasting disease becomes established. Cutthroat trout, even if recovering slowly in the Yellowstone Lake area, face a bleak future as spawning streams decline due to drought effects. Moth sites in the high mountains could also diminish, and they are highly vulnerable to human disturbance. The science claimed by the government to support delisting has considerable, undisclosed uncertainty. From 1988 to 1997, I was the pilot of many official grizzly bear observation flights in the GYE, working out of Driggs, Idaho with Western Air Research. Observers I flew with varied a lot in their ability to see bears, and in their tolerance for the kind of flying best applied to finding bears. How many bears we saw during a flight seemed to have as much or more to do with the day's conditions, the observer's characteristics, and luck than anything else. Some bears ran for cover immediately, making it hard to know how many cubs a female had with her. Success was high in open areas, so we spent more time flying in those areas. It was hard to know if we saw individual bears more than once on any given flight. Lighting conditions change continually with aircraft direction and clouds, etc., so a bear that looked dark could look light, adding to the problem of distinguishing animals. Having experienced these issues, I find it hard to accept that the government knows accurately how many bears there are, based on the number of observed bears. Statistics can handle some problems, but large variations in observations cannot be avoided. This makes for very poor confidence margins. The idea that the government will know when the number declines to "500 bears" or "612 bears" is a fable. It is clear that the state game agencies want to implement grizzly bear trophy hunting as soon as they can. The killing of bears for sport and pleasure is not acceptable to me, and I believe that is true for the majority of the public. As a resident of Wyoming, I see that Wyoming Game & Fish Department has these problems: (1) a high intolerance of predatory wildlife, as we see in their endorsement of not protecting wolves in most of the state, and trying to aim for the near-minimum number of wolves in the trophy hunting zone. (2) chronic problems maintaining some species that WGFD issues licenses for, including mule deer and moose, whose numbers have dropped sharply, while elk are maintained due to being fed through the winter on feed grounds which is headed for big problems with chronic wasting disease. (3) much political interference by politicians who dislike native predators. (4) livestock are more highly valued than bears, as we see in the large number of bears killed or moved each year to protect privately owned cattle and sheep grazed on our public lands. (5) poaching.	FWS-R6-ES-2016-0042-5038

As a resident of Wyoming, I see that Wyoming Game & Fish Department has these problems:(1) a high intolerance of predatory wildlife, as we see in their endorsement of not protecting wolves in most of the state, and trying to aim for the near-minimum number of wolves in the trophy hunting zone.(2) chronic problems maintaining some species that WGFD issues licenses for, including mule deer and moose, whose numbers have dropped sharply, while elk are maintained due to being fed through the winter on feed grounds which is headed for big problems with chronic wasting disease.(3) much political interference by politicians who dislike native predators. (4) livestock are more highly valued than bears, as we see in the large number of bears killed or moved each year to protect privately owned cattle and sheep grazed on our public lands.(5) poaching problems that are under reported and much bigger than the small number of wardens can handle. Furthermore, WGFD has demonstrated a high propensity for killing or moving bears rather than managing people, when bears are seen near human developments. Given these problems, I find it unfathomable that the government thinks that turning over the fate of grizzly bears to the states is in the interest of the bears. The recent announcement that Montana would issue bear permits for as little as \$50, shows how little regard state wildlife agencies have for grizzly bears and the long-term efforts to recover the population that taxpayers and federal agencies have supported for decades.			Factor D	Removing grizzly bears in the Greater Yellowstone Ecosystem from the protection of the Endangered Species Act at this time would be a enormous mistake. Threats to the species are increasing, not decreasing. Increasing numbers of people are living in and visiting the GYE, and some are pursuing more radically disruptive activities. 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Bear numbers will surely decline under state management, and there will be an enormous effort to stall attempts to relist bears as an endangered species once declines become apparent. This reduction will not only undo achieved recovery efforts, it will prevent bears from moving into areas they need to survive changes in the environment and from connecting with other bear populations.			Factor D	Removing grizzly bears in the Greater Yellowstone Ecosystem from the protection of the Endangered Species Act at this time would be a enormous mistake. Threats to the species are increasing, not decreasing. Increasing numbers of people are living in and visiting the GYE, and some are pursuing more radically disruptive activities. Scientists and managers are just starting to get a handle on climate change and what it will mean for this area and wildlife. Fish & Wildlife Service's opinion that climate change is no problem for grizzly bears is just not credible. There is much uncertainty about the future of important grizzly bear foods. As a pilot, flying professionally and recreationally in the GYE since the late 1980s, I have witnessed the rapid death of huge swaths of forests in the mountains, including most of the old whitebark pine stands that produced most of the pine seeds. The loss of this important bear food will take a long time to manifest itself fully or even to be understood, particularly if the other most important foods are reduced by climate change or other factors. Elk numbers could decline sharply if chronic wasting disease becomes established. Cutthroat trout, even if recovering slowly in the Yellowstone Lake area, face a bleak future as spawning streams decline due to drought effects. Moth sites in the high mountains could also diminish, and they are highly vulnerable to human disturbance. The science claimed by the government to support delisting has considerable, undisclosed uncertainty. From 1988 to 1997, I was the pilot of many official grizzly bear observation flights in the GYE, working out of Driggs, Idaho with Western Air Research. Observers I flew with varied a lot in their ability to see bears, and in their tolerance for the kind of flying best applied to finding bears. How many bears we saw during a flight seemed to have as much or more to do with the day's conditions, the observer's characteristics, and luck than anything else. Some bears ran for cover immediately, making it hard to know how many cubs a female had with her. Success was high in open areas, so we spent more time flying in those areas. It was hard to know if we saw individual bears more than once on any given flight. Lighting conditions change continually with aircraft direction and clouds, etc., so a bear that looked dark could look light, adding to the problem of distinguishing animals. Having experienced these issues, I find it hard to accept that the government knows accurately how many bears there are, based on the number of observed bears. Statistics can handle some problems, but large variations in observations cannot be avoided. This makes for very poor confidence margins. The idea that the government will know when the number declines to "500 bears" or "612 bears" is a fable. It is clear that the state game agencies want to implement grizzly bear trophy hunting as soon as they can. The killing of bears for sport and pleasure is not acceptable to me, and I believe that is true for the majority of the public. As a resident of Wyoming, I see that Wyoming Game & Fish Department has these problems: (1) a high intolerance of predatory wildlife, as we see in their endorsement of not protecting wolves in most of the state, and trying to aim for the near-minimum number of wolves in the trophy hunting zone. (2) chronic problems maintaining some species that WGFD issues licenses for, including mule deer and moose, whose numbers have dropped sharply, while elk are maintained due to being fed through the winter on feed grounds which is headed for big problems with chronic wasting disease. (3) much political interference by politicians who dislike native predators. (4) livestock are more highly valued than bears, as we see in the large number of bears killed or moved each year to protect privately owned cattle and sheep grazed on our public lands. (5) poaching	FWS-R6-ES-2016-0042-5038
STATE MANAGEMENT SOURCES ARE HOSTILE AND JEOPARDIZE SPECIES SURVIVAL. These states, Wyoming, Montana and Idaho, have shown themselves to be incredibly hostile toward predators and are politically in bed with the ranchers and hunters.			Factor D	This is not even close to the time where Grizzly Bears should be delisted. Here are several reasons why I believe this is a wrong decision. 1- STATE MANAGEMENT SOURCES ARE HOSTILE AND JEOPARDIZE SPECIES SURVIVAL. These states, Wyoming, Montana and Idaho, have shown themselves to be incredibly hostile toward predators and are politically in bed with the ranchers and hunters. They fail to see the value of the Grizzly Bears just as they are as a tool to draw tourists into the Greater Yellowstone Eco System and believe they can make more money with \$50 to \$100.00 hunting licenses over millions and millions of tourists being drawn to the area to hopefully see a Grizzly. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. 2-- BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. 3- MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. Please consider these issues closely before making a final decision. My hope is that the Grizzlies remain on the ESA for many years to come, as this is not the time to delist. But, if the final decision is to delist, I would certainly hope you would consider expanding the boundaries of protection for the Grizzlies around the GYE 20-50 miles. These Grizzlies do wander outside of the park boundaries in search of food and for hibernation, which would subject them to being hunted. Thank you for your attention to this very important matter.	FWS-R6-ES-2016-0042-5097

Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development – golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures.			Factor D WHY? 'IS MY QUESTION' Why in the world would you try to eradicate the Grizzly Bear population again?' It is so unfortunate that Fish and Wildlife service doesn't seem to exist to protect the wildlife but to destroy it. You always come up with phony reasons to open fire on anything that moves. I get the feeling that you are a bunch of hunters anxious to pull the trigger legally. Just to refresh your memory: The grizzly bear once roamed free throughout the Western states, including 52 of California's 58 counties. Abundant in the Central Valley and North Bay in the 1800s, California grizzlies were also seen feasting on decaying whale carcasses along the shores of Monterey Bay. The last grizzly in California was shot by hunters in the 1920s, although it remains the familiar icon on our state flag. In state after state, ranchers and hunters wiped out local populations, until they were isolated in but a few small ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the greater Yellowstone population was estimated at 300 BEARS. Due to coordinated efforts by federal and state resources agencies mandated by the ESA, cooperative research, monitoring, habitat protections and regulatory mechanisms, including a strict hunting ban, their numbers have grown over the past 30 years to slightly more than 600 BEARS today, according to U.S. Fish and Wildlife's bear recovery coordinator, Chris Servheen. This is a success story that must be acknowledged and celebrated. I do not have to give you the details about why Grizzlys should remain protected, you know them as well as I do. But just in case: While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development – golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human	FWS-R6-ES-2016-0042-5079
FWS could well see more than 40 years of recovery efforts squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans.			Factor D I am a veterinarian, a biologist and a concerned citizen and for the reasons stated below, it is my firm conviction that grizzly bears should not be delisted in the Greater Yellowstone Ecosystem. Actual numbers of grizzly bears are merely estimates as are the numbers required to support a sustainable populations for one of the slowest-reproducing mammals in North America with female grizzlies giving birth only every three years, if conditions are right. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399 would be threatened by the delisting. FWS could well see more than 40 years of recovery efforts squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America.. By the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range and grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. The management of isolated populations of free-ranging carnivores like grizzly bears and wolves is flawed. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. A leaked memo states that if the GYE grizzly bears are delisted, that they will open up trophy hunting seasons for grizzlies in Wyoming, Idaho and Montana which suggests that opening such seasons is a prime motivation for the states in pushing for de-listing. The FWS needs to strongly consider the majority interests of the American people including hunters. A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: -55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. -More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. -Only 30% support trophy hunting. -50 percent of hunters nationwide	FWS-R6-ES-2016-0042-5116

The management of isolated populations of free-ranging carnivores like grizzly bears and wolves is flawed. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management.			Factor D	I am a veterinarian, a biologist and a concerned citizen and for the reasons stated below, it is my firm contention that grizzly bears should not be delisted in the Greater Yellowstone Ecosystem. Actual numbers of grizzly bears are merely estimates as are the numbers required to support a sustainable populations for one of the slowest-reproducing mammals in North America with female grizzlies giving birth only every three years, if conditions are right. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399 would be threatened by the delisting. FWS could well see more than 40 years of recovery efforts squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. By the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range and grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. The management of isolated populations of free-ranging carnivores like grizzly bears and wolves is flawed. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. A leaked memo states that if the GYE grizzly bears are delisted, that they will open up trophy hunting seasons for grizzlies in Wyoming, Idaho and Montana which suggests that opening such seasons is a prime motivation for the states in pushing for de-listing. The FWS needs to strongly consider the majority interests of the American people including hunters. A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: -55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. -More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. -Only 30% support trophy hunting. -60 percent of hunters oppose de-	FWS-R6-ES-2016-0042-5116
2) Regulatory mechanisms. There are not adequate regulatory mechanisms in place to guarantee grizzly populations are maintained, especially if hunting is allowed. USFWS and states need to set strict caps on grizzly mortality and ensure mechanisms and funding are in place to reduce human-bear conflict.			Factor D	I am writing to say I do not support the USFWS plan to delist the grizzly bear. Grizzly bear recovery has been a slowly successful, long-term process for the Interagency Grizzly Bear Study Team; they should be proud of their efforts. But I don't believe there is scientific consensus that the species is beyond the need for protection. And I don't believe there is agreement among all interests that the grizzly population is stable enough to withstand hunting. The USFWS states in a their press release from March 3, 2016 that delisting does not solely rely on numbers but also includes "the quantity and quality of habitat, adequate regulatory mechanisms to maintain a healthy and viable population, and a good balance of male and female bears that are well-distributed throughout the ecosystem." I believe all of these factors are unresolved and continue to place the grizzly bear at risk. 1) Quantity/quality of habitat. Climate change and development pressure continue to impact grizzly bear food sources and habitat. Traditional food sources (whitebark pine, cutworm moths, cutthroat trout) are threatened by climate change and invasive species. Development continues to fragment the edges and connectivity of core grizzly bear range. Management needs to aggressively protect habitat including limiting development and road densities in core areas. USFWS needs to work with states and other land management agencies to ensure long-term habitat protection. 2) Regulatory mechanisms. There are not adequate regulatory mechanisms in place to guarantee grizzly populations are maintained, especially if hunting is allowed. USFWS and states need to set strict caps on grizzly mortality and ensure mechanisms and funding are in place to reduce human-bear conflict. 3) Bear distribution. Scientists and concerned citizens have always maintained that in order to ensure a strong and stable population there must be a genetic connectivity to other grizzly populations in the Northern Rockies. I am concerned that pressure from hunting and other human-bear conflict will continue to isolate the Greater Yellowstone population. On an emotional and intellectual level I just don't believe an iconic animal such as the grizzly bear should be hunted. If they were restored to their historic range and allowed to roam the Rocky Mountains, the Great Plains and the Central Valley I might feel differently, but that is never going to happen. I think there is too much risk of increased mortality to bears if a spring and fall hunting season is opened. Finally, I don't think delisting is an appropriate tool of adaptive management when applied to conservation biology. I'm not sure it works well within the regulatory framework of the Endangered Species Act. It is too coarse, too slow, and does not allow for versatile adaptability. I think it will be much more challenging to relist the grizzly than it is to delist (which is proving challenging enough). The numbers might look good at this moment in time but I'm worried about the long-term trend, with unresolved pressure from climate change and habitat fragmentation, on the stability of the grizzly bear.	FWS-R6-ES-2016-0042-5158
There also needs to be adequate and continual funding for Bear conservation in place, including bear management personnel to deal with bear-people conflicts, before delisting happens. The loss of federal money for conservation efforts is a major concern regarding delisting.			Factor D	To the U.S. Fish and Wildlife Service: I am writing for the board of directors of the North Fork Preservation Association to comment on the proposal to remove Grizzly Bears in the Greater Yellowstone Ecosystem from the Federal List of endangered and threatened wildlife. Our community on the North Fork of the Flathead River in Northwest Montana, sitting just below the U.S./Canadian border next to Glacier National Park is one of the most ecologically diverse regions in North America. We also have the highest population of Grizzly Bears in the lower 48 states. Surrounded by public land and wildlife habitat, we have learned to live peacefully in the Grizzlies country. We value these bears and have enjoyed watching their numbers grow over the last few decades. The conservation efforts that have been deployed to encourage the Grizzly Bears recovery have been a great success. However, these efforts should be continued until Grizzly populations are connected over the entire landscape between Yellowstone and the Yukon. Isolated populations do not do well over the long run. Grizzly Bears need to be allowed to roam freely through all areas with suitable habitat. The Yellowstone grizzly bear population is an isolated population. There is very little evidence that Grizzly Bears from Yellowstone travel to other Grizzly Bear populations to the north. Without this connectivity, genetic diversity cannot remain strong in the Yellowstone population. For this reason, we feel that it is too early to delist Grizzly Bears. We also disagree with trophy hunting grizzly bears. It has taken many decades and millions of our tax dollars to change the trend toward extinction and hunting these iconic creatures seems contrary to everything that we have achieved. In addition, the status of Grizzly Bears in the public mind has risen. Many visitors come to Montana and Wyoming hoping to see a Grizzly Bear. These bears are the heritage of all of the people in the U.S., not just those of us who live in Montana, Wyoming, or Idaho. Just from an economic viewpoint these Bears generate more income for Montana, Wyoming, and Idaho from visitors than will ever be realized from 10-50 annual Trophy Tags. There are many more people who want to see a grizzly bear than shoot one. There also needs to be adequate and continual funding for Bear conservation in place, including bear management personnel to deal with bear-people conflicts, before delisting happens. The loss of federal money for conservation efforts is a major concern regarding delisting. For these reasons, we oppose the delisting of Grizzly Bears at this time.	FWS-R6-ES-2016-0042-5128

One of the biggest problems is the lack of regulatory controls on grizzly bear mortality once delisting has occurred.			Factor D	I oppose delisting because delisting means that states which have shown themselves to be very unfriendly to predators will allow trophy hunting. These three states have already indicated as much - even though most Americans oppose trophy hunting of Yellowstone ecosystem's grizzly bears. One of the biggest problems is the lack of regulatory controls on grizzly bear mortality once delisting has occurred. With the lowest reproductive rate of any mammal in North America, grizzly bears cannot sustain many deaths, especially among adults. Most grizzlies die because people kill them, so controlling the rates at which we kill these animals is crucial. In fact, the ESA has been vital to reducing rates of human-caused grizzly bear mortality. (Willcox, 2016) The states of Montana, Idaho, and especially Wyoming exert huge pressures on the FWS to delist Yellowstone's grizzlies. Once delisted, the states will immediately sell trophy grizzly hunting permits for substantial amounts of money. (Peacock, 2014) Exactly how many hunting permits will be offered and how successful those hunts will be is unknown, but it is clear that an atmosphere will be created throughout the greater Yellowstone ecosystem where it is very easy to kill a grizzly for any reason. Grizzlies have one of the lowest reproductive rates of any land mammal; once the number of bear deaths outstrip the number of cubs born, the Yellowstone grizzly is on the road to extinction. (Peacock, 2015) The ESA represents the conscience of the broader public when it comes to grizzly bears and other imperiled species. By contrast, our state wildlife management agencies in the Northern Rockies represent the views of a politically influential minority whose interests focus on extractive uses of the natural world. State wildlife managers do not want to adopt binding restrictions because anything of this sort would put them at odds with their hunter constituency and their politically powerful masters in the energy and agriculture industries. (Willcox, 2016) I agree with Ms. Willcox. Your agency represents the American citizens - not just the fish and game departments of three states. American citizens do NOT want these bears delisted and they really do not want them hunted. Please listen to the science. Please listen to the citizens. Keep grizzly bears protected.	FWS-R6-ES-2016-0042-5161
Having seen the treatment of wolves in the states of Montana, Idaho, and Wyoming following their delisting, I have little confidence in the ability of the states to manage another large predator with trophy hunts. Wyoming had its control of wolves revoked; and I do not believe they will do any better with their control of grizzlies.			Factor D	I do not support removing the GYE grizzly bear population protections. As a guide and educator in the Greater Yellowstone Ecosystem, I believe that there are some flaws with this proposal. First of all, two main food sources of Yellowstone grizzlies- Whitebark Pine Nuts and Cutthroat Trout- are not stable, and it is unclear what effect their further decline will have on grizzlies who rely heavily on them for food. The Center for Biological Diversity recognizes the threat of climate change on these food sources and therefore on the grizzly. Grizzly mortality is also increasing. Even if there were an accurate count of grizzlies in the ecosystem, this should be cause for concern. Their range is also merely a fraction of what it was historically-somewhere around 4%. Is that really enough range to be considered recovered to a point where delisting can be an option? Also, many Native American tribes oppose the delisting of the grizzly, and I stand by their opposition as the grizzly is culturally and environmentally important to them. Having seen the treatment of wolves in the states of Montana, Idaho, and Wyoming following their delisting, I have little confidence in the ability of the states to manage another large predator with trophy hunts. Wyoming had its control of wolves revoked; and I do not believe they will do any better with their control of grizzlies. The grizzly bear is still a recovering, threatened animal in the Greater Yellowstone Ecosystem.	FWS-R6-ES-2016-0042-5204
The states of Montana, Idaho, and especially Wyoming exert huge pressures on the FWS to delist Yellowstone's grizzlies. Once delisted, the states will immediately sell trophy grizzly hunting permits for substantial amounts of money. (Peacock, 2014) Exactly how many hunting permits will be offered and how successful those hunts will be is unknown, but it is clear that an atmosphere will be created throughout the greater Yellowstone ecosystem where it is very easy to kill a grizzly for any reason.			Factor D	I oppose delisting because delisting means that states which have shown themselves to be very unfriendly to predators will allow trophy hunting. These three states have already indicated as much - even though most Americans oppose trophy hunting of Yellowstone ecosystem's grizzly bears. One of the biggest problems is the lack of regulatory controls on grizzly bear mortality once delisting has occurred. With the lowest reproductive rate of any mammal in North America, grizzly bears cannot sustain many deaths, especially among adults. Most grizzlies die because people kill them, so controlling the rates at which we kill these animals is crucial. In fact, the ESA has been vital to reducing rates of human-caused grizzly bear mortality. (Willcox, 2016) The states of Montana, Idaho, and especially Wyoming exert huge pressures on the FWS to delist Yellowstone's grizzlies. Once delisted, the states will immediately sell trophy grizzly hunting permits for substantial amounts of money. (Peacock, 2014) Exactly how many hunting permits will be offered and how successful those hunts will be is unknown, but it is clear that an atmosphere will be created throughout the greater Yellowstone ecosystem where it is very easy to kill a grizzly for any reason. Grizzlies have one of the lowest reproductive rates of any land mammal; once the number of bear deaths outstrip the number of cubs born, the Yellowstone grizzly is on the road to extinction. (Peacock, 2015) The ESA represents the conscience of the broader public when it comes to grizzly bears and other imperiled species. By contrast, our state wildlife management agencies in the Northern Rockies represent the views of a politically influential minority whose interests focus on extractive uses of the natural world. State wildlife managers do not want to adopt binding restrictions because anything of this sort would put them at odds with their hunter constituency and their politically powerful masters in the energy and agriculture industries. (Willcox, 2016) I agree with Ms. Willcox. Your agency represents the American citizens - not just the fish and game departments of three states. American citizens do NOT want these bears delisted and they really do not want them hunted. Please listen to the science. Please listen to the citizens. Keep grizzly bears protected.	FWS-R6-ES-2016-0042-5161
The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population.			Factor D	The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population. Research has also shown threshold population effects, which could mean that by the time the problem is detected, it is too late to fix the problem. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Indeed, at the recent announcement of the delisting proposal, Senator Larry Craig used the opportunity to call for weakening the Endangered Species Act. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources. The delisting plan lacks binding motorized access management standards to protect habitat. The 1993 Grizzly Bear Recovery Plan and scientific research have demonstrated that roads kill bears.	FWS-R6-ES-2016-0042-5224

The entirety of the Wyoming Range, Caribou Range (Idaho), and the Targhee National Forest west of Jackson, WY should be included in the DMA. Grizzly populations currently in the Wyoming Range and other areas that fall outside of the DMA, are subject to extreme management actions and killing by hunters. No incentive to protect bears in suitable habitat outside the DMA.4) Grizzlies located outside the PCA will be "allowed to expand into biologically suitable and socially acceptable areas". How does a state, hostile to predators, identify what is socially acceptable. A blank check for heavy handed management. Again, areas in the Upper Green, around Teton Park, and the northern Wind River Range with established grizzly populations most likely will see dramatic decreases in numbers.			Factor D	1) The Primary Conservation Area... (PCA) does not include all of Grand Teton National Park and areas of the Northern Wind Rivers and Upper Green River where grizzlies have long been established. The PCA should be expanded and updated to include these and all areas where grizzlies are currently found. 2) Areas outside the PCA are referred to the Demographic Management Area (DMA). The DMA will be mostly managed by state agencies. Fortunately a good chunk of grizzly habitat falls within tribal lands (in WY) not subject to heavy handed state mismanagement of predators. 3) The entirety of the Wyoming Range, Caribou Range (Idaho), and the Targhee National Forest west of Jackson, WY should be included in the DMA. Grizzly populations currently in the Wyoming Range and other areas that fall outside of the DMA, are subject to extreme management actions and killing by hunters. No incentive to protect bears in suitable habitat outside the DMA. 4) Grizzlies located outside the PCA will be "allowed to expand into biologically suitable and socially acceptable areas". How does a state, hostile to predators, identify what is socially acceptable. A blank check for heavy handed management. Again, areas in the Upper Green, around Teton Park, and the northern Wind River Range with established grizzly populations most likely will see dramatic decreases in numbers. 5) Maintain only 500 grizzlies in the Greater Yellowstone Ecosystem (GYE). With estimates over 700, there is no motivation for the states to maintain grizzly numbers. 6) There is already a lot of human caused mortality outside the PCA, especially in the Upper Green River and Wind River areas. This probably will become worse since the State will have primary management control in these areas. 7) There are still healthy stands of Whitebark Pine outside the PCA in the Northern and Southern Wind Rivers, vital food for grizzlies. These areas will be primarily managed by the states. 8) The Wyoming management of grizzlies in the DMA as stated in their management plan, "significant consideration will be given to humans". We can only assume grizzlies will pay with their lives more often at the hands of state employees. Socially Accepted = Intolerance. 9) Wyoming Plan and handling of nuisance bears; "Grizzlies displaying natural aggression may be removed from the population." Natural aggression is defined as a grizzly defending itself, cubs, or food source. In the DMA, seems like grizzlies will be killed when they simply defend themselves by our intrusions. 10) A grizzly getting into chicken coups (without electric fences or other means to try and deter grizzlies) most likely will be killed by game managers, especially in the DMA. This is an alarming trend in grizzly country with the rise of people wanting to raise their own chickens. Outside of cattle and sheep, chickens are resulting in dead grizzlies. 11) The concern over sport hunting is real. There should be a moratorium on any sport hunting for 10 years to ensure the State is doing all it can to preserve grizzlies. 12) I DO NOT support delisting grizzlies in the Greater Yellowstone Area. It ensures the population will remain an isolated population. Historically hostile views of western states towards predators is proof enough that grizzlies should not be delisted. Wyoming has yet to turn in an acceptable wolf plan. How can it be expected to manage the vast majority of grizzlies within the GYE.	FWS-R6-ES-2016-0042-0533
The Wyoming management of grizzlies in the DMA as stated in their management plan, "significant consideration will be given to humans". We can only assume grizzlies will pay with their lives more often at the hands of state employees. Socially Accepted = Intolerance.9) Wyoming Plan and handling of nuisance bears; "Grizzlies displaying natural aggression may be removed from the population." Natural aggression is defined as a grizzly defending itself, cubs, or food source. In the DMA, seems like grizzlies will be killed when they simply defend themselves by our intrusions.			Factor D	1) The Primary Conservation Area... (PCA) does not include all of Grand Teton National Park and areas of the Northern Wind Rivers and Upper Green River where grizzlies have long been established. The PCA should be expanded and updated to include these and all areas where grizzlies are currently found. 2) Areas outside the PCA are referred to the Demographic Management Area (DMA). The DMA will be mostly managed by state agencies. Fortunately a good chunk of grizzly habitat falls within tribal lands (in WY) not subject to heavy handed state mismanagement of predators. 3) The entirety of the Wyoming Range, Caribou Range (Idaho), and the Targhee National Forest west of Jackson, WY should be included in the DMA. Grizzly populations currently in the Wyoming Range and other areas that fall outside of the DMA, are subject to extreme management actions and killing by hunters. No incentive to protect bears in suitable habitat outside the DMA. 4) Grizzlies located outside the PCA will be "allowed to expand into biologically suitable and socially acceptable areas". How does a state, hostile to predators, identify what is socially acceptable. A blank check for heavy handed management. Again, areas in the Upper Green, around Teton Park, and the northern Wind River Range with established grizzly populations most likely will see dramatic decreases in numbers. 5) Maintain only 500 grizzlies in the Greater Yellowstone Ecosystem (GYE). With estimates over 700, there is no motivation for the states to maintain grizzly numbers. 6) There is already a lot of human caused mortality outside the PCA, especially in the Upper Green River and Wind River areas. This probably will become worse since the State will have primary management control in these areas. 7) There are still healthy stands of Whitebark Pine outside the PCA in the Northern and Southern Wind Rivers, vital food for grizzlies. These areas will be primarily managed by the states. 8) The Wyoming management of grizzlies in the DMA as stated in their management plan, "significant consideration will be given to humans". We can only assume grizzlies will pay with their lives more often at the hands of state employees. Socially Accepted = Intolerance. 9) Wyoming Plan and handling of nuisance bears; "Grizzlies displaying natural aggression may be removed from the population." Natural aggression is defined as a grizzly defending itself, cubs, or food source. In the DMA, seems like grizzlies will be killed when they simply defend themselves by our intrusions. 10) A grizzly getting into chicken coups (without electric fences or other means to try and deter grizzlies) most likely will be killed by game managers, especially in the DMA. This is an alarming trend in grizzly country with the rise of people wanting to raise their own chickens. Outside of cattle and sheep, chickens are resulting in dead grizzlies. 11) The concern over sport hunting is real. There should be a moratorium on any sport hunting for 10 years to ensure the State is doing all it can to preserve grizzlies. 12) I DO NOT support delisting grizzlies in the Greater Yellowstone Area. It ensures the population will remain an isolated population. Historically hostile views of western states towards predators is proof enough that grizzlies should not be delisted. Wyoming has yet to turn in an acceptable wolf plan. How can it be expected to manage the vast majority of grizzlies within the GYE.	FWS-R6-ES-2016-0042-0533
The delisting of the GYE grizzly bears is premature. The grizzly bear was listed in 1975, and saw large population growth and stabilization. It has been listed for forty-one years, and while there has been significant growth in the program, when considering the possible implications of climate change and hunting on the species, forty-one years is not long enough time of protection. In allowing the states to manage the GYE grizzly bear that will allow the GYE, a game species, to potentially be hunted. The proposed rule states that Idaho, Wyoming, and Montana have no current plans to allow the grizzly to be hunted, but that proposition will not last long. State fish and wildlife agencies are more pliable than the federal government, increased public pressure to hunt the bears will lead to state regulated hunting.			Factor D	The delisting of the GYE grizzly bears is premature. The grizzly bear was listed in 1975, and saw large population growth and stabilization. It has been listed for forty-one years, and while there has been significant growth in the program, when considering the possible implications of climate change and hunting on the species, forty-one years is not long enough time of protection. In allowing the states to manage the GYE grizzly bear that will allow the GYE, a game species, to potentially be hunted. The proposed rule states that Idaho, Wyoming, and Montana have no current plans to allow the grizzly to be hunted, but that proposition will not last long. State fish and wildlife agencies are more pliable than the federal government, increased public pressure to hunt the bears will lead to state regulated hunting. The proposed rule outlines the perimeters for federal intervention and hunting allowances, but that outline is insufficient, because it does not consider the cumulative effects of climate change and hunting on the species. The proposed rule discusses the possible impacts of climate change on the species separate of direct human impacts. The proposed rules fails to view both of these large impacts congruently. The proposed rule states that the hunting allowances can be changed year to year, giving some flexibility to agency. But this flexibility may not be enough. A large fire or extreme drought stemming from climate change following hunting season could decimate the population, even if the following hunting season is cancelled. These two large population controls need to be consider in tandem. The grizzly population recovery is important, predator species are so very important to the health of western ecosystems. It is too soon to remove the grizzly bear, because the long term effects of climate change on the species is too unknown to open the species up to state management, where the possibly for large scale hunting is very high. Many in the west view predators as an issue, but that approach should not influence the delisting of the GYE grizzly, because the future effects of climate change are too unknown. Forty-one years of recovery should not be hastily dashed, because of public pressure on limiting predator species.	FWS-R6-ES-2016-0042-0591

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Our family has used livestock to cause the disturbance necessary to enhance the grazing resource in southeastern Idaho and southwestern Montana for over 140 years. One of the ranges we use is on the southside of the Centennial Mountain range west of Yellowstone National Park. The land management regulations on the Caribou-Targhee National Forest resulting from litigation regarding grizzly bear habitat has impacted the working landscape and our ability to manage it responsibly. Environmental interests have used the ESA and the grizzly bear as a weapon to change land use and extend the "natural regulation" management policy of YNP throughout the GYA. These litigious actions have hamstrung the Forest Service's ability to responsibly manage the resources under their authority. Timber management has been brought to a halt, historical access restricted, grazing restricted or prohibited (sheep) and agency budgets consumed with litigation expenses and legal fee awards. These environmental groups have no plans to actively manage instead rely on the no-management mode of "natural regulation" which is totally irresponsible in a working landscape. They are using the habitat requirements under the ESA for grizzly bear and other species as a weapon to change land use in the western landscape. This is unacceptable and the grizzly bear's recovery in the Yellowstone area has demonstrated these habitat arguments and restrictions are not as critical as thought. The grizzly bear has done very well. On our livestock allotment (The High Five Cattle and Horse Allotment) we see where the bear have been using the old timber roads to get around, the game and cattle trails to go here and there, using varied food sources based on their availability and generally getting along fine in an area that is being grazed and was heavily logged in the past. The grizzly bear in the Island Park area do not seem to mind the recreation, the home sites and the people on the landscape. Whether or not the bear exists seems to depend more on how we manage them, than on how we manage the habitat because they can eat about anything and seem to be very adaptable. Multiple uses on the landscape certainly do not need to be curtailed as much as believed to accommodate the grizzly bear. The bear's recovery has demonstrated this. What is needed is the ability to manage bears that are causing problems and are becoming a threat to human life by their aggressive action. Delisting the Grizzly Bear in the GYA is certainly warranted and will allow us to better manage these animals in the future. Tracking these bears with GPS has really helped us understand their needs and movements and gives us cause to reexamine the restrictions place on the landscape that are making it difficult for us to responsibly manage it. It certainly would be conceivable to allow hunting to some extent and use this tool to harvest problem bears for the benefit of the whole population. The Centennial Range is a tall forb plant community and represents one of the premier domestic sheep grazing resources in the world. The Sheep Station has repeatedly demonstrated that we have the tools (herders, dogs and control of the sheep) to provide adequate protection to the flocks from grizzly bear attacks. The grizzly bear is being used as a weapon to remove the Sheep Station from the Centennials. The grizzly bear may kill a sheep or two, but should it kill a whole research program that has grazing and habitat research amenities that no one wants to recognize. There will be problem bears once in a while which can be dealt with, but in general sheep and bears			Factor D	Our family has used livestock to cause the disturbance necessary to enhance the grazing resource in southeastern Idaho and southwestern Montana for over 140 years. 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Idaho and Wyoming are insane as far as wildlife protection, especially predator protection, is concerned. I wouldn't trust them for a minute with the management of an animal as irrationally hated in those states as the grizzly.			Factor D	I strongly oppose the delisting of the Yellowstone ecosystem grizzly population, for the following reasons: 1. Only the smallest core habitat is in a protected area, the park. The increasing pressure on the remaining wild ecosystem by development on the periphery of the park and elsewhere in the region is not conducive to complacency about the ability of the population to continue to do well, even under the existing protections. 2. The habitat is still marginal for food sources, and the climate crisis is only going to make the situation worse. 3. Idaho and Wyoming are insane as far as wildlife protection, especially predator protection, is concerned. I wouldn't trust them for a minute with the management of an animal as irrationally hated in those states as the grizzly. Please withdraw this proposed regulation and continue to manage grizzly populations as they are managed today.	FWS-R6-ES-2016-0042-0743
I do not trust state fish and game agencies to manage these animals responsibly. They only serve hunters, trappers and outfitters, and do not care about conservation biology.			Factor D	Please do not delist Grizzly bears. It's unfortunate that in our society, there seem to be only two categories of management: "listed under the ESA" or "open season." I do not trust state fish and game agencies to manage these animals responsibly. They only serve hunters, trappers and outfitters, and do not care about conservation biology. We can see what a mess they have made of wolf management in all the states that have delisted wolves. I'm not saying that management is not required, but I am saying that state game agencies are political entities that have demonstrated no interest in these species, other than as targets for hunters. They even hold wildlife "derbies," which is illustrative of their mindset. We need a different kind of management - ecosystem management - and the FWS is the entity best able to carry this out. The ESA requires the government to recover not only species, but the "ecosystems upon which they depend," and until we have re-established those functioning ecosystems, individual species should remain listed, perhaps in a "threatened" status. Call it an upgrade in condition, but please do not open the door to hunting, especially trophy hunting, which is a cruel and despicable waste of life. Bears that come too close to private property and human habitations should be darted and relocated, and killed only on the rare occasions that they come back and cause damage. I would submit that the Greater Yellowstone Ecosystem needs more habitat protection, so that large animals (elk, wolves, bears, bison, etc.) can move freely without being killed by humans. The real answer is not to keep bears to a minimum "viable" population and call that "recovery," but to provide more habitat. I recognize the difficulty in that, but I urge you to work toward establishment of the great Yellowstone-to-Yukon corridor, which is the only lasting hope of survival for these great charismatic species. No good can come of hunting grizzly bears.	FWS-R6-ES-2016-0042-5335

The States (Wyoming Montana, Idaho, and any other relevant state) in the Greater Yellowstone Ecosystem are very well equipped to manage the grizzly bear population. Each State has been successfully managing the population of wildlife within its boundaries for over 20 years. The States' natural resources departments with the professional staff members including wildlife biologists who have the training and experience to manage the grizzly bear population within their respect boundaries. Therefore I think that the management of the grizzly bear population should be turned over to the States.			Factor D	I think that the grizzly bear should be delisted in the Greater Yellowstone Ecosystem and management of the grizzly bear population should be turned over to the States. It is abundantly clear that the grizzly bear population has recovered to the point that delisting is appropriate. i) The States (Wyoming Montana, Idaho, and any other relevant state) in the Greater Yellowstone Ecosystem are very well equipped to manage the grizzly bear population. Each State has been successfully managing the population of wildlife within its boundaries for over 20 years. The States' natural resources departments with the professional staff members including wildlife biologists who have the training and experience to manage the grizzly bear population within their respect boundaries. Therefore I think that the management of the grizzly bear population should be turned over to the States. ii) The failure to begin State management of the grizzly bear population at this time poses substantial public risk. Allowing the grizzly bear population to continue to grow out of control places the public visiting Yellowstone National Park at substantial risk of injury and death. The grizzly bear is a very dangerous bear that can viciously attack Yellowstone visitors with little or no provocation. I am sorry to say that most Yellowstone visitors are bear-stupid thinking that they can safely get a close up of a grizzly bear with their smartphone. Furthermore, I expect that almost all Yellowstone visitors don't have a can of bear spray with them when visiting the Park. I think that failure to delist the grizzly bear now will mean that several Yellowstone visitors will be mauled or killed by grizzly bears each year as the grizzly bear population continues to increase geometrically. iii) Grizzly bears don't have any natural predators that control their population growth. Therefore, the grizzly bear population within the Greater Yellowstone Ecosystem will increase geometrically if they are not delisted now. Almost every grizzly bear sow has 2 cubs each year, and since almost all of the cubs will survive each year, the grizzly bear population will increase essentially geometrically in the coming years. iv) Allowing the grizzly bear population to grow out of control will detrimentally impact the number of elk, deer, bison and other animals in the food chain in the Greater Yellowstone Ecosystem. Just as the wolf population has a detrimental impact on these other animals, too many grizzly bears in the Greater Yellowstone Ecosystem will exacerbate this depredation even further. Recently wolves killed over a dozen elk just for the fun of it as they could not possibly consume all of the elk they killed. I expect that will repeat with an overpopulation of grizzly bears who we know kill far to man elk calves. v) Allowing the grizzly bear population to grow out of control will detrimentally impact the cattle, sheep and other livestock in the Greater Yellowstone Ecosystem. Grizzly bears will go after the easy kills of livestock and their new babies. Not delisting the grizzly bear in the Greater Yellowstone Ecosystem will be a death sentence to an excessive livestock grazing there. Paying ranchers for livestock depredation by grizzly bears will become a substantial expense. Fools run from one extreme to another. Let's not be fools and take action now to delist the grizzly bear in the Greater Yellowstone Ecosystem. Please carefully consider my comments. Regards, Rollee Hackbart	FWS-R6-ES-2016-0042-1258
I DO NOT SUPPORT DELISTING the grizzly or the Yellowstone Draft Plan due to the lack of protection offered to the great Grizzly Bear. These bears need to travel to find mates. How can this species not only survive, but thrive, when their gene pool is so isolated? They need to be able to travel to find mates who offer gene diversity without the threat of hunters, habitat loss, or disgruntled ranchers. These bears should be able to expand their territory to sustain their species without human threat.			Factor D	I am a proud American and value what makes this country unique, including our land and wildlife. After hearing of the debate about Grizzly Bear delisting, not only was I disappointed, but angry. Angry because, once again, it seems those who are paid by American citizens to manage and protect our countries treasures are bowing to some wealthy political lobbyists. We have torn down forests, paved over habitat, wiped out entire species, and built our capitalist shrines throughout this nation. It is past time to reign in our greed and arrogance. It is time to take pride in this country's life. Delisting will only bring hunts... And hunts contributed to the grizzly numbers dropping to less than 200 in the 70s. I DO NOT SUPPORT DELISTING the grizzly or the Yellowstone Draft Plan due to the lack of protection offered to the great Grizzly Bear. These bears need to travel to find mates. How can this species not only survive, but thrive, when their gene pool is so isolated? They need to be able to travel to find mates who offer gene diversity without the threat of hunters, habitat loss, or disgruntled ranchers. These bears should be able to expand their territory to sustain their species without human threat. These ranchers need to man up... Stop blaming the bear and wolves for trying to survive on what little land we've left for them. Ranchers are the intruders. They need to take more precautions before taking out their rifles on my land. This is PUBLIC LAND PAID FOR BY TAXPAYERS and most of us want the wildlife to stay in tact. Also, the plan talks about waiting for THREE years of lowered bear population before action is taken. With what I know about the difficult and slow reproductive rates of these bears, I consider THREE years too long without a response by a management team. After all, it took grizzly bears 40 years to raise their numbers to only about 700. While the plan does not mention an intended grizzly hunt, I can only guess it's impending. I do not support a hunt at this time especially in or AROUND Yellowstone. And definitely not in any area that interrupts the bears' passage to find mates. And if you allow hunts, how will hunters differentiate between males and mothers with cubs that depend on her for survival? Or will they even care? Starving, motherless cubs is not acceptable. This plan is no plan without addressing these points. Please consider my words while remembering the dire state of the worlds wildlife. Be part of the solution. With deep concern, Ang Sutton	FWS-R6-ES-2016-0042-1373
There are not adequate existing regulatory mechanisms taking place outside the ESA. For example, the state of Wyoming's plan states that they will not let the demographic of the bears drop below 500 individuals. This would mean the population could potentially lose at least 30% of its current members, not including the estimates that the population doubles every two years. That substantially decreases not only the current and future population but the genetic diversity as well. The goal of the Endangered Species Act is to recover individuals to a level where they can sustain their population and increase in numbers for the futures. The current proposal to delist encourages the reduction of the population to a precarious level			Factor D	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306

Also, the plan talks about waiting for THREE years of lowered bear population before action is taken. With what I know about the difficult and slow reproductive rates of these bears, I consider THREE years too long without a response by a management team. After all, it took grizzly bears 40 years to raise their numbers to only about 700.			Factor D	I am a proud American and value what makes this country unique, including our land and wildlife. After hearing of the debate about Grizzly Bear delisting, not only was I disappointed, but angry. Angry because, once again, it seems those who are paid by American citizens to manage and protect our countries treasures are bowing to some wealthy political lobbyists. We have torn down forests, paved over habitat, wiped out entire species, and built our capitalist shrines throughout this nation. It is past time to reign in our greed and arrogance. It is time to take pride in this country's life. Delisting will only bring hunts... And hunts contributed to the grizzly numbers dropping to less than 200 in the 70s. I DO NOT SUPPORT DELISTING the grizzly or the Yellowstone Draft Plan due to the lack of protection offered to the great Grizzly Bear. These bears need to travel to find mates. How can this species not only survive, but thrive, when their gene pool is so isolated? They need to be able to travel to find mates who offer gene diversity without the threat of hunters, habitat loss, or disgruntled ranchers. These bears should be able to expand their territory to sustain their species without human threat. These ranchers need to man up... Stop blaming the bear and wolves for trying to survive on what little land we've left for them. Ranchers are the intruders. They need to take more precautions before taking out their rifles on my land. This is PUBLIC LAND PAID FOR BY TAXPAYERS and most of us want the wildlife to stay in tact. Also, the plan talks about waiting for THREE years of lowered bear population before action is taken. With what I know about the difficult and slow reproductive rates of these bears, I consider THREE years too long without a response by a management team. After all, it took grizzly bears 40 years to raise their numbers to only about 700. While the plan does not mention an intended grizzly hunt, I can only guess it's impending. I do not support a hunt at this time especially in or AROUND Yellowstone. And definitely not in any area that interrupts the bears' passage to find mates. And if you allow hunts, how will hunters differentiate between males and mothers with cubs that depend on her for survival? Or will they even care? Starving, motherless cubs is not acceptable. This plan is no plan without addressing these points. Please consider my words while remembering the dire state of the worlds wildlife. Be part of the solution. With deep concern, Ang Sutton	FWS-R6-ES-2016-0042-1373
While the plan does not mention an intended grizzly hunt, I can only guess it's impending. I do not support a hunt at this time especially in or AROUND Yellowstone. And definitely not in any area that interrupts the bears' passage to find mates. And if you allow hunts, how will hunters differentiate between males and mothers with cubs that depend on her for survival? Or will they even care? Starving, motherless cubs is not acceptable. This plan is no plan without addressing these points.			Factor D	I am a proud American and value what makes this country unique, including our land and wildlife. After hearing of the debate about Grizzly Bear delisting, not only was I disappointed, but angry. Angry because, once again, it seems those who are paid by American citizens to manage and protect our countries treasures are bowing to some wealthy political lobbyists. We have torn down forests, paved over habitat, wiped out entire species, and built our capitalist shrines throughout this nation. It is past time to reign in our greed and arrogance. It is time to take pride in this country's life. Delisting will only bring hunts... And hunts contributed to the grizzly numbers dropping to less than 200 in the 70s. I DO NOT SUPPORT DELISTING the grizzly or the Yellowstone Draft Plan due to the lack of protection offered to the great Grizzly Bear. These bears need to travel to find mates. How can this species not only survive, but thrive, when their gene pool is so isolated? They need to be able to travel to find mates who offer gene diversity without the threat of hunters, habitat loss, or disgruntled ranchers. These bears should be able to expand their territory to sustain their species without human threat. These ranchers need to man up... Stop blaming the bear and wolves for trying to survive on what little land we've left for them. Ranchers are the intruders. They need to take more precautions before taking out their rifles on my land. This is PUBLIC LAND PAID FOR BY TAXPAYERS and most of us want the wildlife to stay in tact. Also, the plan talks about waiting for THREE years of lowered bear population before action is taken. With what I know about the difficult and slow reproductive rates of these bears, I consider THREE years too long without a response by a management team. After all, it took grizzly bears 40 years to raise their numbers to only about 700. While the plan does not mention an intended grizzly hunt, I can only guess it's impending. I do not support a hunt at this time especially in or AROUND Yellowstone. And definitely not in any area that interrupts the bears' passage to find mates. And if you allow hunts, how will hunters differentiate between males and mothers with cubs that depend on her for survival? Or will they even care? Starving, motherless cubs is not acceptable. This plan is no plan without addressing these points. Please consider my words while remembering the dire state of the worlds wildlife. Be part of the solution. With deep concern, Ang Sutton	FWS-R6-ES-2016-0042-1373
Finally, state management of the bears is a risk in and of itself. We have seen what happened when these predator-unfriendly states "managed" the wolves. The populations were decimated. Wyoming's so much so that a federal judge had to re-list Wyoming wolves. There are no assurances that things would be any different with management of grizzlies. Indeed, the discussion between the states so far has indicated that they plan a trophy hunting season and that bears dispersing to connect with other populations would be among those first to be killed.			Factor D	I oppose the delisting of Greater Yellowstone Ecosystem grizzly bears. Their population is at risk as it isolated from other grizzly bear populations. There are no plans for connecting the two populations, which is key to long term survival of the species. Further, grizzly bears are one of the slowest reproducing mammals in North America. What would happen if a number of bears died due to unforeseen events in a single year? The population would be in jeopardy. Finally, state management of the bears is a risk in and of itself. We have seen what happened when these predator-unfriendly states "managed" the wolves. The populations were decimated. Wyoming's so much so that a federal judge had to re-list Wyoming wolves. There are no assurances that things would be any different with management of grizzlies. Indeed, the discussion between the states so far has indicated that they plan a trophy hunting season and that bears dispersing to connect with other populations would be among those first to be killed. As if that weren't enough, a majority of Americans oppose the delisting of Yellowstone area grizzly bears. These bears are icons of the American wilderness as well as a huge tourism draw to the region. They should be protected, not delisted.	FWS-R6-ES-2016-0042-1455
Directly after removal from protections, in 2008, Grizzlies died in record numbers, there were virtually no penalties for killing them. Bear management had been turned over to fish and game agencies of Wyoming, Idaho and Montana who more than welcome the opportunity to kill a Grizzly bear whose life was made less valuable by delisting. Some 54 grizzly bears including 37 shot by humans were known to have died that year, the highest mortality ever recorded exceeding the extensive killings of 40 years ago when Yellowstone National Park closed down its garbage dumps leaving the bears to search for food sources in towns and campgrounds.			Factor D	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530
Trophy hunting of the grizzly is not sound management of the speices. There should be a three to five year moratorium on even considering hunting as a management tool.			Factor D	I say NO to the delisting of Grizzly Bears. Trophy hunting of the grizzly is not sound management of the speices. There should be a three to five year moratorium on even considering hunting as a management tool. GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it	FWS-R6-ES-2016-0042-1783
YNP has called for a buffer zone outside YNP boundaries upon delisting. In the plan there is no visible support for YNP request.			Factor D	See Attached Attachments Gutkoski Joe	FWS-R6-ES-2016-0042-1797

The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing.			Factor D	Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and fish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations." The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting.	FWS-R6-ES-2016-0042-1859
The delisting of the Yelloestone grizzlies would be a devastating mistake for many reasons. To preserve and enhance this isolated gene pool good science should provide guidance to implement a plan to provide interaction with other bear populations. This would also allow for a greater range for food forage. Grizzlies have a slow rate of reproduction and any females lost would tip the scales unfavorably. A certain elements in some Western States is all too eager to decimate their bear and wolf populations. This hostility displaces scientific studies and any respect for their wildlife and the will of the people throughout the United States.			Factor D	The delisting of the Yelloestone grizzlies would be a devastating mistake for many reasons. To preserve and enhance this isolated gene pool good science should provide guidance to implement a plan to provide interaction with other bear populations. This would also allow for a greater range for food forage. Grizzlies have a slow rate of reproduction and any females lost would tip the scales unfavorably. A certain elements in some Western States is all too eager to decimate their bear and wolf populations. This hostility displaces scientific studies and any respect for their wildlife and the will of the people throughout the United States.	FWS-R6-ES-2016-0042-1926
There numbers have over exced there goal since they was listed. We live with the bears, and the Wyoming Game and Fish should have control over the grizzlys to manage them like they should.			Factor D	The grizzly bears need to be delisted. There are to many for what forest and food is available. Look how many people have been killed in the last 5 years, by grizzly bears. Look at how many bears are relocated every year. They take them from one place to another. Then when they get in trouble there, they bring them back. They have no fear of humans. There numbers have over exced there goal since they was listed. We live with the bears, and the Wyoming Game and Fish should have control over the grizzlys to manage them like they should.	FWS-R6-ES-2016-0042-1931
The population will be put in jeopardy as they will be at the mercy of hunters and improper state management. We do not even know at this time what severe effects may happen to the Grizzly bear population due to global warming.			Factor D	See Attached Attachments Davison Dennis	FWS-R6-ES-2016-0042-2007
Please do NOT delist the Grizzly Bear from the Federal List of Endangered and Threatened Wildlife. Trophy hunting is alive and well, and equally unmanaged in the United States. Please reconsider and do not remove them at this time. People will go nuts and decimate them - after a significant effort to reintroduce and regrow. They can be carefully managed by the FWS			Factor D	Please do NOT delist the Grizzly Bear from the Federal List of Endangered and Threatened Wildlife. Trophy hunting is alive and well, and equally unmanaged in the United States. Please reconsider and do not remove them at this time. People will go nuts and decimate them - after a significant effort to reintroduce and regrow. They can be carefully managed by the FWS.	FWS-R6-ES-2016-0042-2130
It's my understanding that (Sec. 4(a)(1)(D)) of the ESA requires adequacy of existing regulatory mechanisms **before** animals can be removed from the endangered species list. If Montana has only listed today the hunting regs they are going to use once the grizzlies are delisted, how much time could the USFWS possibly have had to study that plan to determine its adequacy?The impression i'm getting is that they're just a great big bunch of "good ole boys" who make a wild arse guess then do whatever they please because there isn't anyone that can stop them.			Factor D	It's my understanding that (Sec. 4(a)(1)(D)) of the ESA requires adequacy of existing regulatory mechanisms **before** animals can be removed from the endangered species list. If Montana has only listed today the hunting regs they are going to use once the grizzlies are delisted, how much time could the USFWS possibly have had to study that plan to determine its adequacy? The impression i'm getting is that they're just a great big bunch of "good ole boys" who make a wild arse guess then do whatever they please because there isn't anyone that can stop them.	FWS-R6-ES-2016-0042-3475

These plans often involve target population numbers based on federal recovery goals, which should be considered minimums, and in no state is the plan to increase grizzly population numbers or increase habitat quality and acreage or decrease habitat fragmentation. Including areas of continued recovery (e.g., increasing grizzly habitat and population numbers) should be required for each state management plan in order for the federal government to consider delisting. One only has to consider the delisting of the gray wolf in these states to realize the strange partnership between the state agencies and the hunting and ranching communities. Many stakeholders are involved and concerned with state wildlife management and currently state agencies do not seem to realize this in any way.			Factor D	The real issue in this situation is that the public does not trust state agencies to manage grizzly bear populations with regard to all stakeholders. With a reputation for bowing to the hunting and ranching communities, the state agencies of MT, WY, and ID have not proven that they can manage wildlife in any manner other than establishing trophy hunting seasons immediately upon delisting in order to satisfy a small proportion of the state's citizens. These plans often involve target population numbers based on federal recovery goals, which should be considered minimums, and in no state is the plan to increase grizzly population numbers or increase habitat quality and acreage or decrease habitat fragmentation. Including areas of continued recovery (e.g., increasing grizzly habitat and population numbers) should be required for each state management plan in order for the federal government to consider delisting. One only has to consider the delisting of the gray wolf in these states to realize the strange partnership between the state agencies and the hunting and ranching communities. Many stakeholders are involved and concerned with state wildlife management and currently state agencies do not seem to realize this in any way. Delisting grizzly bears seems to be based on sound science. However, habitat loss, conflicts with humans, and climate change remain concerns for grizzly bear populations into the future. The state agencies dismiss these concerns by proposing hunting seasons immediately upon a delisting ruling and the states have not acknowledged that recovery of any species occurs along a gradient. A conservative state management approach would consider future impacts to a long-lived species with slow reproduction and also consider the values of the non-hunting and ranching stakeholders. Unless state agencies can prove to the public that the opinions of all of their citizens are being considered, issues related to the Endangered Species Act, both listing and delisting will persist. The only way this can be mitigated for the grizzly bear is to deny delisting until the state management plans are written in a way that promotes grizzly populations while considering future human-caused changes to the ecosystem and also the opinions and values of all stakeholders weighted to their prevalence in their home state.	FWS-R6-ES-2016-0042-5015
I would like to see the Grizzly bear to go a hunt management plan. This way the population of them can be controlled.			Factor D	I believe the Grizzly bear should be removed from the Endangered species list. I hunt over by West Yellowstone and each year we are running into more and more Grizzlies. I would like to see the Grizzly bear to go a hunt management plan. This way the population of them can be controlled. Hunting is a good source of conservation.	FWS-R6-ES-2016-0042-0134
In your review of the states' plans for conservation, I recommend that no grizzly bear may be taken over a bait site or when pursued by dogs. These methods tend to divide hunters and the general public. While difficult to judge in the field, some incentive for harvesting males could be beneficial.			Factor D	I am in support of removing the GYE population of grizzly bears from the federal list of endangered and threatened wildlife. This action would lead to additional support of the species from hunters, who as a group are generally much more likely to be interested in conserving a species that they can pursue as game. In your review of the states' plans for conservation, I recommend that no grizzly bear may be taken over a bait site or when pursued by dogs. These methods tend to divide hunters and the general public. While difficult to judge in the field, some incentive for harvesting males could be beneficial. Grizzly bear recovery and sustainable harvest going forward highlights great success and a testament to the lasting benefit of the North American Model of wildlife conservation.	FWS-R6-ES-2016-0042-0137
In my opinion, states are always better at regulating things that pertain to the interest of the citizens of that state. Therefore I am in favor of delisting the Grizzly bear from the federal government's endangered species list and turning over the regulation to the states.			Factor D	In my opinion, states are always better at regulating things that pertain to the interest of the citizens of that state. Therefore I am in favor of delisting the Grizzly bear from the federal government's endangered species list and turning over the regulation to the states.	FWS-R6-ES-2016-0042-0141
Additionally, management by the states is now needed as bears are becoming more and more bold as they have an UNNATURAL lack of fear/respect for humans.			Factor D	I support delisting grizzly bears in the GYE. Let the biologists do their job and take the emotional nonsense out of this quagmire. The scientists have said the populations are stable/recovered. Additionally, management by the states is now needed as bears are becoming more and more bold as they have an UNNATURAL lack of fear/respect for humans.	FWS-R6-ES-2016-0042-0145
THEY ARE NOT FULLY RECOVERED AND LOOKING AT THE WYOMING STATE MANAGEMENT PLAN IT RESTRICTS THEIR DISPERSEMENT AND REALLY DOES NOT GIVE THEM SUFFICIENT ROOM TO SURVIVE IN.			Factor D	Please do not delist the grizzly. Their total population has not been recovered sufficiently and I am very concerned that with the delisting, hunting will began immediately. Once that would happen, there will be no way to keep the number of grizzlies at a good recovery level. The killing of female grizzlies will hamper the continuance of the species as they do not have cubs every year and there will be no way to sustain their numbers. Trophy hunting of the grizzly by the states is not management of an apex predator that is essential to the sustainment of healthy eco- systems. UFWs needs to stop catering to the desires of special interests and needs to manage and protect these iconic beings. Ranchers and Hunters only reflect a minority in this country. The majority of citizens do not want the Grizzly delisted. It seems government agencies have forgotten that the consumption of beef and other domestic livestock is of choice, not necessary to maintain a healthy diet. Domestic livestock like cattle and sheep are not essential to one's daily diet. Protein can be found in various other food sources and the sooner that is realized, the sooner this obsession to protect the product of a private industry just might stop. The Grizzly like other predators is necessary and should be allowed to coexist with our species. We humans are not gods and we need to stop acting like such and not dictate what beings live or die. DO NOT DELIST THE GRIZZLY. THEY ARE NOT FULLY RECOVERED AND LOOKING AT THE WYOMING STATE MANAGEMENT PLAN IT RESTRICTS THEIR DISPERSEMENT AND REALLY DOES NOT GIVE THEM SUFFICIENT ROOM TO SURVIVE IN. NOT A GOOD PLAN. OVERSIGHT OF THE GRIZZLY NEEDS TO BE KEPT AT THE FEDERAL LEVEL.	FWS-R6-ES-2016-0042-0209
By not transferring the Grizzly bear to the state(s) for management in how they see fit (as long as they maintain the agreed upon population size), the grizzly bear project is dragging down and preventing other successful opportunities under the endangered and threatened system.			Factor D	Yes the Grizzly bear should be removed off the endangered/threatened list for the greater Yellowstone area. The goal of the system has been met/exceeded so management of the grizzly bear needs to be transferred to the State(s). By not transferring the Grizzly bear to the state(s) for management in how they see fit (as long as they maintain the agreed upon population size), the grizzly bear project is dragging down and preventing other successful opportunities under the endangered and threatened system. Please use scientific goals/reasons to delist and NOT liberal Disney character philosophy to keep the grizzly on the list. Thanks, Brian	FWS-R6-ES-2016-0042-0246

Delisting these bears would be premature. They are genetically isolated from the bears in northern Montana and Canada. That means the population must be particularly robust - and there is not evidence to suggest that it is. Further, it is still possible to connect these two populations through the Selway Bitterroot Recovery Area. Certainly, there are more sightings of bears but that does not mean that there are actually more bears. With the sharp decline of whitebark pine seeds, cutthroat trout, and elk as well as the drop in berries, grizzly bears have had to range further in search of food. That search often puts them in conflict with humans and has forced grizzlies to resort to more meat, which sometimes means more livestock. Indeed, the number one cause of death for grizzlies in the Yellowstone Ecosystem these days is human. Delisting would only exacerbate this. Instead of delisting the bears, please consult with the coalition of Tribes. Please work with them to achieve full recovery of the Yellowstone grizzly bear. Please do not risk the future of Yellowstone's iconic grizzly bears. Please give me and my family another chance to experience the magic of Yellowstone grizzly bears.			Factor D	I write to OPPOSE the proposed delisting. My family visited Yellowstone a couple of years ago. We were fortunate enough to see a mother grizzly with her three cubs. A coyote waited in the wings for them to finish feasting on a carcass. It was magical, amazing and connected my children to nature in a way they have never forgotten. Delisting these bears would be premature. They are genetically isolated from the bears in northern Montana and Canada. That means the population must be particularly robust - and there is not evidence to suggest that it is. Further, it is still possible to connect these two populations through the Selway Bitterroot Recovery Area. Certainly, there are more sightings of bears but that does not mean that there are actually more bears. With the sharp decline of whitebark pine seeds, cutthroat trout, and elk as well as the drop in berries, grizzly bears have had to range further in search of food. That search often puts them in conflict with humans and has forced grizzlies to resort to more meat, which sometimes means more livestock. Indeed, the number one cause of death for grizzlies in the Yellowstone Ecosystem these days is human. Delisting would only exacerbate this. Instead of delisting the bears, please consult with the coalition of Tribes. Please work with them to achieve full recovery of the Yellowstone grizzly bear. Please do not risk the future of Yellowstone's iconic grizzly bears. Please give me and my family another chance to experience the magic of Yellowstone grizzly bears.	FWS-R6-ES-2016-0042-0253
Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management			Factor D	I oppose the delisting of Grizzly bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the ecosystem is full or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before discretionary (hunting, management removals etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the states current management plan) i.e. Wyoming Range, southern Winds, Salt River Range TO CONCLUDE: - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? - Bears are facing an uncertain future. Last year alone 42 bears were killed in conflicts, most of which were food related deaths.	FWS-R6-ES-2016-0042-0286
The western state wildlife departments, sportsman, and conservation groups have demonstrated great success and competency at managing/increasing game species over the past century. When a species has value to sportsman, it in turn receives the financial and local demographic support to thrive on the landscape.			Factor D	I am commenting in support of delisting the Grizzly Bear from the ESA and returning the management to the state wildlife departments. The Grizzly Bear recovery has been a great success with increasing numbers and dispersion documented through the Greater Yellowstone area. The intent of the ESA is not to list species in perpetuity; rather return management of recovered species to the states. The western state wildlife departments, sportsman, and conservation groups have demonstrated great success and competency at managing/increasing game species over the past century. When a species has value to sportsman, it in turn receives the financial and local demographic support to thrive on the landscape. Unfortunately, other "environmental" groups seem to funnel most of their efforts into attorney fees vs. conserving wildlife habitat. I live and recreate in the Grizzly Bear recovery area. I do not want to see them ever vanish from the landscape. I would like to see controlled hunting of male bears to scientifically manage their populations. I urge the USFWS to base the decision off of the unbiased science and delist the Grizzly Bear.	FWS-R6-ES-2016-0042-0392
Don't let the grizzly bears become extinct. If their fate is turned over to the anti-carnivore states of Wyoming, Montana and Idaho this could happen. Wyoming's plan doesn't even allow for a no-hunting corridor around or between the parks. Many bears, mostly sow's with Cubs or older bears who need protection, hang out close to the roads. Without Federal protection these bears will be easy targets for hunters. Some hunters are already targeting specific bears that they intend to kill if they are delisted.			Factor D	Do NOT delist the grizzly bears. They have the lowest reproduction rate of any North American mammal, their food sources are disappearing due to climate change and to the Lake Trout, they need to reach other bear populations for biological diversity, they're important to the Greater Yellowstone ecosystem, to our history and to our culture. I believe this is being fueled by greed and by the desire of some people to have a grizzly bear head as a trophy. Those are not reasons to delist them! Their are sound scientific reason to NOT delist them! Over a million people visit Yellowstone and Grand Teton annually, mostly to see grizzly bears. Don't let the grizzly bears become extinct. If their fate is turned over to the anti-carnivore states of Wyoming, Montana and Idaho this could happen. Wyoming's plan doesn't even allow for a no-hunting corridor around or between the parks. Many bears, mostly sow's with Cubs or older bears who need protection, hang out close to the roads. Without Federal protection these bears will be easy targets for hunters. Some hunters are already targeting specific bears that they intend to kill if they are delisted. Don't let this happen. Look at the statistics. Global warming is real, whatever the cause. It is effecting the grizzly bear and other animals. That's reason enough not to delist them. We can live with the Bears. People can learn to keep their food inside, to be more careful when they're hiking and to carry bear spray when hiking in grizzly territory. The problems with bears have been caused by humans, not by the Bears! We should be able to deal with it. We're supposed to be the responsible ones. Let's act like it!	FWS-R6-ES-2016-0042-0417

Delisting relies on habitat management plans which are not yet in place. x The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. Å			Factor D	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear.No one knows where the additional monies will come from to pay for implementation of the delisting plan. 8. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears.	FWS-R6-ES-2016-0042-0452
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. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. This means that the estimates of current population growth rates in the delisting plan will no longer apply after delisting			Factor D	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear.No one knows where the additional monies will come from to pay for implementation of the delisting plan. 8. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually.	FWS-R6-ES-2016-0042-0452
The US Fish and Wildlife Service and the State of Wyoming appear to condone Wyoming county laws prohibiting bears within their borders. Four counties in Wyoming have passed laws barring bears within their borders. Recovery goals cannot be achieved if these counties implement their laws as they intend .			Factor D	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear.No one knows where the additional monies will come from to pay for implementation of the delisting plan. 8. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually.	FWS-R6-ES-2016-0042-0452
The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone.Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area.			Factor D	1. Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population. 2. Grizzly bears are not recovered across their historic range. 3. Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399, would be threatened by the delisting. The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "the reality is that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the Great Yellowstone Area. Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting. 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. Finally, I agree with Tom Poor Bear who concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations." Do not delist grizzly bears!	FWS-R6-ES-2016-0042-5023

As reported by Montana on the Ground, ", the reality is that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the Great Yellowstone Area.			Factor D	1. Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population. 2. Grizzly bears are not recovered across their historic range. 3. Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399, would be threatened by the delisting. The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, ", the reality is that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the Great Yellowstone Area. Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting. 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. Finally, I agree with Tom Poor Bear who concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations." Do not delist grizzly bears!	FWS-R6-ES-2016-0042-5023
Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species.			Factor D	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife, primarily grizzlies and wolves. Allowing a "trophy" hunt, targeting the park grizzlies is not only an easy hunt, but not a hunt at all, no less an ambush of the species. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, even resistant to managing a species of high importance to the non-hunting public and/or the federal government (i.e. - Gray wolves). In addition, even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. In comparison to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of aggressive state sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to	FWS-R6-ES-2016-0042-0463

The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management.			Factor D As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are used to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife, primarily grizzlies and wolves. Allowing a "trophy" hunt, targeting the park grizzlies is not only an easy hunt, but not a hunt at all, no less an ambush of the species. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, even resistant to managing a species of high importance to the non-hunting public and/or the federal government (i.e. - Gray wolves). In addition, even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. In comparison to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects	FWS-R6-ES-2016-0042-0463
FWS claim: Their agency will stay involved with protecting the grizzly population after delisting. The reality: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing.			Factor D The U.S. Fish and Wildlife Service (FWS) wants to strip endangered species Act protection from the Greater Yellowstone Ecosystem grizzly bear. We have only until May 10 to comment on the FWS proposal. FWS claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claim: The shortage of cutthroat trout and white bark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yaak region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. FWS claim: Their agency will stay involved with protecting the grizzly population after delisting. The reality: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. FWS claim: The agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. The reality: When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio	FWS-R6-ES-2016-0042-5043

The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, even resistant to managing a species of high importance to the non-hunting public and/or the federal government (i.e. - Gray wolves). In addition, even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management.			Factor D	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife, primarily grizzlies and wolves. Allowing a "trophy" hunt, targeting the park grizzlies is not only an easy hunt, but not a hunt at all, no less an ambush of the species. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, even resistant to managing a species of high importance to the non-hunting public and/or the federal government (i.e. - Gray wolves). In addition, even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. In comparison to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of species state sponsored sport hunting, and much less able to recover from predictable hunting success designed by state agencies to	FWS-R6-ES-2016-0042-0463
Sport hunting is unnecessary for managing a stable bear population. At minimum, there should be a delay in the onset of hunting until Idaho, Montana and Wyoming have demonstrated their commitment to a responsible management plan and maintaining a stable population, particularly given the record high number (59) of bears killed in 2015.			Factor D	Please do not delist Grizzly Bears. Now is not the time to take away protections for this at-risk native species. In a time when climate change and habitat loss are challenging all wildlife to adapt and survive, the only reasonable and responsible action will be to rule that Grizzly Bears should not be delisted at this time. Grizzly bear food sources (including the whitebark pine) are collapsing and mortality rates are already increasing. Yellowstone Grizzly bears are experiencing a high level of conflict with humans and delisting would mean that any hungry bear who steps outside Yellowstone National Park will be killed by waiting hunters. Bears do not recognize park boundaries and bears just need to eat. The Greater Yellowstone Ecosystem is their home, and that includes the park and areas outside its boundaries. It is a fact that a prime motivation for the states of Idaho, Montana and Wyoming in pushing for delisting of Grizzly bears is trophy hunting and the perceived economic gain this 'sport' will bring. While the USFWS estimates there are more than 700 grizzlies in the Greater Yellowstone Ecosystem, no one really knows how many bears there are and this number could well be an over-estimation of true populations. Until it is known exactly how many grizzly bears exist in the Greater Yellowstone Ecosystem, it would be irresponsible to delist them and allow the states to open up their trophy hunt programs. Sport hunting is unnecessary for managing a stable bear population. At minimum, there should be a delay in the onset of hunting until Idaho, Montana and Wyoming have demonstrated their commitment to a responsible management plan and maintaining a stable population, particularly given the record high number (59) of bears killed in 2015. The leading cause of bear mortality is conflicts with humans. In remembrance of Scarface, the 25-year old Grizzly bear who was a park visitor favorite, and the first Grizzly bear I ever saw. Yet he was recently killed by a hunter outside park boundaries when he wandered, likely in search of food. A park icon gone, because he didn't read the park boundary signs and someone was waiting to kill him. This is what will happen to many more Grizzly bears if they are delisted now. Please do not delist Grizzly bears at this time. They must remain protected until Idaho, Montana and Wyoming have reasonable and science-based management plans in place, plans that do not consist of trophy hunting. Thank you for your consideration.	FWS-R6-ES-2016-0042-5074
They must remain protected until Idaho, Montana and Wyoming have reasonable and science-based management plans in place, plans that do not consist of trophy hunting.			Factor D	Please do not delist Grizzly Bears. Now is not the time to take away protections for this at-risk native species. In a time when climate change and habitat loss are challenging all wildlife to adapt and survive, the only reasonable and responsible action will be to rule that Grizzly Bears should not be delisted at this time. Grizzly bear food sources (including the whitebark pine) are collapsing and mortality rates are already increasing. Yellowstone Grizzly bears are experiencing a high level of conflict with humans and delisting would mean that any hungry bear who steps outside Yellowstone National Park will be killed by waiting hunters. Bears do not recognize park boundaries and bears just need to eat. The Greater Yellowstone Ecosystem is their home, and that includes the park and areas outside its boundaries. It is a fact that a prime motivation for the states of Idaho, Montana and Wyoming in pushing for delisting of Grizzly bears is trophy hunting and the perceived economic gain this 'sport' will bring. While the USFWS estimates there are more than 700 grizzlies in the Greater Yellowstone Ecosystem, no one really knows how many bears there are and this number could well be an over-estimation of true populations. Until it is known exactly how many grizzly bears exist in the Greater Yellowstone Ecosystem, it would be irresponsible to delist them and allow the states to open up their trophy hunt programs. Sport hunting is unnecessary for managing a stable bear population. At minimum, there should be a delay in the onset of hunting until Idaho, Montana and Wyoming have demonstrated their commitment to a responsible management plan and maintaining a stable population, particularly given the record high number (59) of bears killed in 2015. The leading cause of bear mortality is conflicts with humans. In remembrance of Scarface, the 25-year old Grizzly bear who was a park visitor favorite, and the first Grizzly bear I ever saw. Yet he was recently killed by a hunter outside park boundaries when he wandered, likely in search of food. A park icon gone, because he didn't read the park boundary signs and someone was waiting to kill him. This is what will happen to many more Grizzly bears if they are delisted now. Please do not delist Grizzly bears at this time. They must remain protected until Idaho, Montana and Wyoming have reasonable and science-based management plans in place, plans that do not consist of trophy hunting. Thank you for your consideration.	FWS-R6-ES-2016-0042-5074

An example as to why delisting of protected wildlife can be detrimental to a species has occurred with State management of the wolf population in Wyoming, Montana, and Idaho. Contest killings in both Montana and Idaho have occurred, which reflect the hatred that people have for "predator" species, and have been ignored by the States' FWS.			Factor D We are adamantly against delisting the Greater Yellowstone Grizzly Bears from the Endangered and an Threatened Wildlife Species Act. An example as to why delisting of protected wildlife can be detrimental to a species has occurred with State management of the wolf population in Wyoming, Montana, and Idaho. Contest killings in both Montana and Idaho have occurred, which reflect the hatred that people have for "predator" species, and have been ignored by the States' FWS. The only certain outcome of delisting the Yellowstone grizzly bears is that it will result in trophy hunting. With delisting, the federal government will turn over grizzly management decisions outside of the park's boundaries to three states that will show no restraint in killing grizzlies. (Peacock, 2016) The Service has fiercely maintained that even if problems arise [under state management], it will not relist the population. Despite some laudatory language about co-existence with grizzly bears, the state grizzly bear management plans lack any binding commitments to do anything other than hunt bears. (Willcox, 2016) The growth of the grizzly population has leveled off; the current population estimate is down six percent from 2014. Mortality from all causes, as reported by the government, was 59 grizzlies in 2015. Reported mortality is about half of actual dead bears an accepted rule of thumb. Start adding in the bears that will be shot in the trophy hunt and you could easily approach 200 dead grizzlies in a single year. Even a population of 700 grizzly bears would be doomed to extinction by such heavy mortality. (Peacock, 2016) Even though the states may be somewhat cautious during the first five years of federal oversight that follows delisting, there is every reason to believe that, over time, state management will reverse the gains made over the last 40 years of endangered species protections. This is especially likely given the crisis that Yellowstone grizzly bears are facing now. During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably are dead. This totals over 90 bears, or more than 12% of the population. The primary factor affecting grizzly bears at both the individual and population level is excessive human-caused mortality. Regulating human-caused mortality through habitat management is an effective approach, as evidenced by increasing grizzly bear populations in the lower 48 States where motorized access standards exist (e.g., GYE and Northern Continental Divide Ecosystem). This requires ongoing monitoring of the grizzly bear population to understand if it is sufficiently resilient to allow for a conservative level of human-caused mortality without causing population decline. We must allow adequate protections for these magnificent animals, so they are not another species destroyed by humans and management policies that are centered around a financial gain and political pressure.	FWS-R6-ES-2016-0042-5103
Toss in the already proposed hunting seasons in WY, MT and ID -- and the certainty that more bears will be killed if delisted -- and the conclusion should be inescapable that it is not yet the time to remove grizzlies from Endangered Species Act protections.			Factor D I want to go on record as strongly OPPOSING delisting for GYA grizzly bears from Endangered Species Act protections. As a 46-year resident of Montana I am very familiar with the Greater Yellowstone Area, its fish and wildlife. Also very familiar with the on-going development in and around Yellowstone, which shows no signs of slowing, let alone reversing the trend of putting ever more humans into the remnants of grizzly habitat and the predictable unfortunate outcome of bear-human interactions, which almost always end in grizzly mortality. I have personally backpacked into and camped out in every wilderness area in Montana, including into the Bob Marshall's famous Chinese Wall, all through Glacier as well as significant time in Yellowstone's backcountry. Truth is, I've seen exactly ONE grizzly bear during all those decades in the wild -- and that was in Glacier National Park. We do not hike with bear bells or other noise-makers on, so I'm quite sure we didn't "spook" any bears away on the hundreds of miles of trails hiked. I also skied across the entire length of both the Anaconda-Pintlar Wilderness (1983) and the Tobacco Root range (1997) and, despite it being early spring when the bears should have been coming out of hibernation, saw not one bear. Consequently, I'm finding it a little hard to believe we now have a "recovered" grizzly population in the Greater Yellowstone area -- or Montana, for that matter. The grizzlies in the Cabinet-Yaak area have been struggling for decades, despite "recovery" attempts and are primarily impacted by habitat loss due to logging and development, with the primary problem being human-caused mortality. It's worth considering the Cabinet-Yaak example because there is currently political pressure to increase logging throughout Montana, including in the GYA (Hebgen Lake area, specifically). Moreover, climate change has already severely impacted traditional food sources for GYA bears with the massive die off of white bark pines. Add to that the illegal introduction of lake trout into Y-stone Lake and the subsequent reduction in historic cutthroat trout spawning runs and the future food supplies for grizzlies in the GYA will probably lead to even more conflicts since both cattle and sheep graze public and private lands in the GYA -- and the Forest Service shows no signs of significantly reducing livestock grazing to protect grizzlies. Likewise, climate change is driving wildfires due to lower snowpack, shorter, warmer winters, earlier springs, drought, and much higher summer temperatures. While the wildfires do not "destroy" forests as some claim, they certainly do affect grizzly habitat. Given the incredibly small "secure zones" for grizzlies, losing the forest cover in those areas to wildfire forces grizzlies into other areas and, again, more conflict with humans and livestock. Put it all together -- along with the predictions for increasing, not decreasing, temperatures -- and it should be obvious that grizzly bears do not have a smooth ride into the future. Toss in the already proposed hunting seasons in WY, MT and ID -- and the certainty that more bears will be killed if delisted -- and the conclusion should be inescapable that it is not yet the time to remove grizzlies from Endangered Species Act protections. Thanks for the opportunity to comment and I hope you're listening to the public on this issue. It doesn't take long to go back through the comments online to see that virtually all of them are against delisting at this time. As someone who actually lives in Montana and knows its wilderness, wildlife and fish very well, I can only hope that you'll take my concerns into serious account when it comes time to make your decision.	FWS-R6-ES-2016-0042-5223

Wyoming has yet to finalize a revised grizzly bear state management plan, and the recently completed draft is not consistent with statements made in the delisting proposal. It is unclear if, let alone when, Idaho or Montana will update their management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the adequate regulatory mechanisms that are required.			Factor D	I thank you for the opportunity to comment on potential Yellowstone Grizzly de-listing. Prairie Hills Audubon Society wants to be assured that the states and federal land management agencies, including the U.S. Forest Service, will manage bears and their habitat in a way that ensures a healthy and expanding grizzly bear population into the future. Prairie Hills Audubon Society is seriously concerned that the U.S. Fish and Wildlife Service (FWS) does not have all the required information and assurances finalized to make an informed decision. Specifically, the Endangered Species Act requires that, before delisting can occur, among other things, there are adequate regulatory mechanisms in place to ensure that the grizzly bear does not slip back towards extinction. These regulatory mechanisms are the responsibility of the states of Wyoming, Montana and Idaho and the appropriate federal land management agencies. However, the necessary management plans that provide these commitments have not been finalized and provided to us by the FWS for review with the proposal. Wyoming has yet to finalize a revised grizzly bear state management plan, and the recently completed draft is not consistent with statements made in the delisting proposal. It is unclear if, let alone when, Idaho or Montana will update their management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the adequate regulatory mechanisms that are required. With development increasing in the Northern Rockies region, public lands are critical for providing essential secure habitat for grizzly bears into the future. The agencies in charge of our public lands have an obligation to ensure that an iconic species like the grizzly bear can continue to thrive. However, the U.S. Forest Service has not revealed when it will amend the management plans of the six national forests surrounding Yellowstone to provide for adequate habitat protections for grizzly bears post-delisting or when this process would be available for public review. Prairie Hills Audubon Society encourages the FWS to continue to work with the state grizzly bear management agencies, tribal agencies and state and federal land management agencies that will be responsible for grizzly bears post delisting on: - Ensuring that robust protections remain in place for the Yellowstone grizzly bear core population including strict limits on mortality and strong habitat protections within the Primary Conservation Area (PCA), the area identified to remain the most protective for grizzly bears after delisting; - Giving Yellowstone grizzly bears the opportunity to continue to expand their range and reconnect with other grizzly bear populations to the north as wells as allow for Yellowstone grizzly bears to expand into the Bitterroot Recovery Zone, currently absent of a grizzly bear population; - Expanding and strengthening habitat protections currently only allocated to the PCA into the larger Demographic Monitoring Area and further into areas identified as important to linkage between grizzly bear populations; - Continuing and strengthening programs that proactively minimize conflicts between bears and people thereby improving social tolerance and public acceptance for the bears throughout their range; and, - Working together to broaden partnerships and secure long term adequate funding for grizzly bear conservation and recovery into the future. In summary, Prairie Hills Audubon Society opposes the delisting of grizzly bears in the Yellowstone Ecosystem and request that the U.S. Fish and Wildlife Service withdraw the proposal until such time as all the required state and federal management plans and other documents that detail how this population of grizzly bears and their habitat will be managed post delisting are finalized. This is too important of a decision	FWS-R6-ES-2016-0042-5311
Areas outside the PCA are referred to the Demographic Management Area (DMA). The DMA will be mostly managed by state agencies. Fortunately a good chunk of grizzly habitat falls within tribal lands (in WY) not subject to heavy handed state mismanagement of predators.			Factor D	1) The Primary Conservation Area... (PCA) does not include all of Grand Teton National Park and areas of the Northern Wind Rivers and Upper Green River where grizzlies have long been established. The PCA should be expanded and updated to include these and all areas where grizzlies are currently found. 2) Areas outside the PCA are referred to the Demographic Management Area (DMA). The DMA will be mostly managed by state agencies. Fortunately a good chunk of grizzly habitat falls within tribal lands (in WY) not subject to heavy handed state mismanagement of predators. 3) The entirety of the Wyoming Range, Caribou Range (Idaho), and the Targhee National Forest west of Jackson, WY should be included in the DMA. Grizzly populations currently in the Wyoming Range and other areas that fall outside of the DMA, are subject to extreme management actions and killing by hunters. No incentive to protect bears in suitable habitat outside the DMA. 4) Grizzlies located outside the PCA will be "allowed to expand into biologically suitable and socially acceptable areas". How does a state, hostile to predators, identify what is socially acceptable. A blank check for heavy handed management. Again, areas in the Upper Green, around Teton Park, and the northern Wind River Range with established grizzly populations most likely will see dramatic decreases in numbers. 5) Maintain only 500 grizzlies in the Greater Yellowstone Ecosystem (GYE). With estimates over 700, there is no motivation for the states to maintain grizzly numbers. 6) There is already a lot of human caused mortality outside the PCA, especially in the Upper Green River and Wind River areas. This probably will become worse since the State will have primary management control in these areas. 7) There are still healthy stands of Whitebark Pine outside the PCA in the Northern and Southern Wind Rivers, vital food for grizzlies. These areas will be primarily managed by the states. 8) The Wyoming management of grizzlies in the DMA as stated in their management plan, "significant consideration will be given to humans". We can only assume grizzlies will pay with their lives more often at the hands of state employees. Socially Accepted = Intolerance. 9) Wyoming Plan and handling of nuisance bears; "Grizzlies displaying natural aggression may be removed from the population." Natural aggression is defined as a grizzly defending itself, cubs, or food source. In the DMA, seems like grizzlies will be killed when they simply defend themselves by our intrusions. 10) A grizzly getting into chicken coups (without electric fences or other means to try and deter grizzlies) most likely will be killed by game managers, especially in the DMA. This is an alarming trend in grizzly country with the rise of people wanting to raise their own chickens. Outside of cattle and sheep, chickens are resulting in dead grizzlies. 11) The concern over sport hunting is real. There should be a moratorium on any sport hunting for 10 years to ensure the State is doing all it can to preserve grizzlies. 12) I DO NOT support delisting grizzlies in the Greater Yellowstone Area. It ensures the population will remain an isolated population. Historically hostile views of western states towards predators is proof enough that grizzlies should not be delisted. Wyoming has yet to turn in an acceptable wolf plan. How can it be expected to manage the vast majority of grizzlies within the GYE.	FWS-R6-ES-2016-0042-0533

Ensuring that robust protections remain in place for the Yellowstone grizzly bear core population including strict limits on mortality and strong habitat protections within the Primary Conservation Area (PCA), the area identified to remain the most protective for grizzly bears after delisting;- Giving Yellowstone grizzly bears the opportunity to continue to expand their range and reconnect with other grizzly bear populations to the north as wells as allow for Yellowstone grizzly bears to expand into the Bitterroot Recovery Zone, currently absent of a grizzly bear population;- Expanding and strengthening habitat protections currently only allocated to the PCA into the larger Demographic Monitoring Area and further into areas identified as important to linkage between grizzly bear populations;			Factor D	Thank you for the opportunity to comment on potential Yellowstone Grizzly de-listing. Prairie Hills Audubon Society wants to be assured that the states and federal land management agencies, including the U.S. Forest Service, will manage bears and their habitat in a way that ensures a healthy and expanding grizzly bear population into the future. Prairie Hills Audubon Society is seriously concerned that the U.S. Fish and Wildlife Service (FWS) does not have all the required information and assurances finalized to make an informed decision. Specifically, the Endangered Species Act requires that, before delisting can occur, among other things, there are adequate regulatory mechanisms in place to ensure that the grizzly bear does not slip back towards extinction. These regulatory mechanisms are the responsibility of the states of Wyoming, Montana and Idaho and the appropriate federal land management agencies. However, the necessary management plans that provide these commitments have not been finalized and provided to us by the FWS for review with the proposal. Wyoming has yet to finalize a revised grizzly bear state management plan, and the recently completed draft is not consistent with statements made in the delisting proposal. It is unclear if, let alone when, Idaho or Montana will update their management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the adequate regulatory mechanisms that are required. With development increasing in the Northern Rockies region, public lands are critical for providing essential secure habitat for grizzly bears into the future. The agencies in charge of our public lands have an obligation to ensure that an iconic species like the grizzly bear can continue to thrive. However, the U.S. Forest Service has not revealed when it will amend the management plans of the six national forests surrounding Yellowstone to provide for adequate habitat protections for grizzly bears post-delisting or when this process would be available for public review. Prairie Hills Audubon Society encourages the FWS to continue to work with the state grizzly bear management agencies, tribal agencies and state and federal land management agencies that will be responsible for grizzly bears post delisting on: - Ensuring that robust protections remain in place for the Yellowstone grizzly bear core population including strict limits on mortality and strong habitat protections within the Primary Conservation Area (PCA), the area identified to remain the most protective for grizzly bears after delisting;- Giving Yellowstone grizzly bears the opportunity to continue to expand their range and reconnect with other grizzly bear populations to the north as wells as allow for Yellowstone grizzly bears to expand into the Bitterroot Recovery Zone, currently absent of a grizzly bear population;- Expanding and strengthening habitat protections currently only allocated to the PCA into the larger Demographic Monitoring Area and further into areas identified as important to linkage between grizzly bear populations;- Continuing and strengthening programs that proactively minimize conflicts between bears and people thereby improving social tolerance and public acceptance for the bears throughout their range; and, - Working together to broaden partnerships and secure long term adequate funding for grizzly bear conservation and recovery into the future. In summary, Prairie Hills Audubon Society opposes the delisting of grizzly bears in the Yellowstone Ecosystem and request that the U.S. Fish and Wildlife Service withdraw the proposal until such time as all the required state and federal management plans and other documents that detail how this population of grizzly bears and their habitat will be managed post delisting are finalized. This is too important of a decision	FWS-R6-ES-2016-0042-5311
It is obvious that states cannot be trusted to manage wildlife. The three states of Montana, Wyoming and Idaho have shown little if any ability to be in agreement when it comes to managing wolves or other species. I see grizzly bear management from these states no different. There would need to be some uniformity, consistency, and communication among these three states to prevent elimination of the bear from certain landscapes. There has been no such history of such behavior of coordinating efforts.			Factor D	See attached file(s). In the attached file, I have comments on the following docket number: Number FWS-R6-ES-2016-0042. Attachments Comments on Delisting Grizzly Bears.20160331	FWS-R6-ES-2016-0042-0540
Also the current management of this animal is causing excessive danger to both bear and human alike. It has recovered and the greater population needs new management to ensure safety of the public and success of the bear.			Factor D	Please follow the existing law and de-list the Yellowstone Grizzly Bear as all requirements to do so have been met. Also the current management of this animal is causing excessive danger to both bear and human alike. It has recovered and the greater population needs new management to ensure safety of the public and success of the bear.	FWS-R6-ES-2016-0042-0701
Given how slowly bears reproduce, the current proposal to allow Wyoming and the other states to exceed the maximum number of bear deaths for several years before even initiating a review could mean that the population is in steep decline before any emergency action can be taken. Instead of promoting and implementing proven co-existence methods to reduce conflicts between bears, livestock, and people, Wyoming plans to aggressively manage bears, including potentially killing them pre-emptively.			Factor D	I live in Jackson, WY and regularly hike and enjoy the wildlife in the Grand Teton National Park and Yellowstone National Park. Removing the grizzly bear from the federal list of endangered and threatened wildlife is a step backward in grizzly recovery, and will result in a smaller grizzly bear population over a smaller area than exists today. Grizzly bears are also a positive economic driver, bringing much more revenue to Wyoming from people who want to see these majestic animals alive and in the wild, rather than through hunting tags. If grizzly bears in the Yellowstone region are delisted, Wyoming plans to initiate a sport trophy hunt. Fifty Native American tribes and many other people are opposed to trophy hunting of grizzly bears. Given how slowly bears reproduce, the current proposal to allow Wyoming and the other states to exceed the maximum number of bear deaths for several years before even initiating a review could mean that the population is in steep decline before any emergency action can be taken. Instead of promoting and implementing proven co-existence methods to reduce conflicts between bears, livestock, and people, Wyoming plans to aggressively manage bears, including potentially killing them pre-emptively. This is an unacceptable and counterintuitive action that the Fish and Wildlife Service absolutely should not undertake.	FWS-R6-ES-2016-0042-0741
I also believe it is critical that wildlife management remain a State's right as they have proven records in the past of fervently protecting both the wildlife and the wildlife's habitat. I have no faith that the federal government is in a position to do a better job than the state			Factor D	I am providing public comment with regards to consideration of the de-listing of grizzly bears from the Federal List of Endangered and Threatened Wildlife. I STRONGLY favor this planned de-listing. I believe that all of the criteria outlined for this de-listing to occur has been met, in fact it was met quite a few years ago. I also believe it is critical that wildlife management remain a State's right as they have proven records in the past of fervently protecting both the wildlife and the wildlife's habitat. I have no faith that the federal government is in a position to do a better job than the state. Allowing the continued expansion of the grizzly in an un-checked and un-managed manner is quite likely to have serious un-intended consequences. Including, but not limited to over-population of the range, deprivation of other wildlife species, conflicts with ranchers, home-owners and car/bear traffic accidents. Please allow this de-listing and the subsequent management of the bear population by the individual states. Thank-you, Dale E. Myers	FWS-R6-ES-2016-0042-0952

A wide ranging top-level opportunistic omnivore such as the grizzly can not be turnedover to the provincial interests of the livestock driven agendas of the state game departments of Wyoming, Idaho and Montana.			Factor D	I oppose the proposed Yellowstone Grizzly Bear Delisting Rule removing the bear from the protections of the Endangered Species Act at this time. I oppose this proposal because the Yellowstone grizzly lives on an island. This island has been isolated from other bear populations for over 100 years. As of this date the bears are still isolated from other populations and there is no provision in this delisting proposal to assure protected linkage habitat to other populations. In fact, the reverse is currently taking place with the US Sheep Experimental Station in the Centennial Mountains of Montana/Idaho still insisting that they must run sheep in this important linkage zone between Yellowstone and the vast central Idaho Wildlands (read their current EIS). The Sheep Station insistence that domestic sheep must take precedence over public wildlife helps insure that the Yellowstone bears will remain on an island. I oppose this proposal because there is still no secure grizzly population in the vast Central Idaho Wildlands even though plans were prepared some 20 years ago to translocate suitable bears into Idaho. This population will be essential to link up with the Yellowstone bears and more northern bear populations to form a truly recovered meta-population of grizzlies in the Lower 48. Until we have such an Idaho population I will know that the USFWS is not serious about achieving true Yellowstone grizzly recovery and I will continue to oppose a Delisting Rule. I oppose this proposal because it will grant the states the right to begin to systematically target grizzlies attempting to recolonize former occupied habitat outside of a "Demographic Monitoring Area" for trophy sport hunts and this will guarantee that true grizzly recovery will be stopped in its tracks. A wide ranging top-level opportunistic omnivore such as the grizzly can not be turned over to the provincial interests of the livestock driven agendas of the state game departments of Wyoming, Idaho and Montana. I oppose this proposal because it does not take into account the unavoidable declining food resources in the Yellowstone core that will accompany the global climate change that is now underway. The grizzlies are adaptable but we must give them the room to adapt in the face of climate change. The State of Wyoming has no intention of giving them that room. The best scenario that this will result from the Delisting Rule is maintenance of a relic population of bears but it can not and will achieve true Yellowstone grizzly bear recovery. The bears must be allowed to disperse into all biologically suitable habitat. An example--The Wyoming Range likely has some of the best bear habitat in the Greater Yellowstone Ecosystem. Because of livestock political power the State of Wyoming considers any bears who attempt to recolonize this superb habitat to be expendable and, beyond doubt, they will be high on the list for trophy, sport hunts. To repeat--to turn management of the Yellowstone grizzlies over to the states will assure that all the investment of time and money up to now toward recovering these bears will be for naught and we will have snatched "defeat right out of the jaws of victory". Now is not the time to turn back. I oppose this premature Proposed Rule for Yellowstone Grizzly Bear Delisting from the Endangered Species Act.	FWS-R6-ES-2016-0042-1109
Delisting relies on habitat management plans which are not yet in place. We are just beginning the Forest Plan Revision for Custer-Gallatin NF. This will take years. There is no guarantee that bear habitat will be protected or that FS funding will be adequate for monitoring. A related factor is the rapidly growing population in our area and the increased number of recreational use within the Custer Gallatin NF. This will impact habitat/bear management. Additional monitoring and money for educational programs will be needed which may and may not be forthcoming.			Factor D	See Attached Attachments Patten Eva	FWS-R6-ES-2016-0042-1227
In order for this success story to continue into the future, we believe that strong state-based conservation planning must be in place. While there may be a time in the near future where de-listing could happen, we do not believe the necessary sideboards are in place now for that to occur. In addition to needed amendments to state-based grizzly bear management policy, federal land management plans also need to be updated to mitigate risks to grizzly bears from human caused mortality and livestock conflict. Until these two things happen, we advise the U.S Fish and Wildlife Service (USFWS) to not de-list the Yellowstone grizzly bear.			Factor D	See attached file for full comment letter. Summary: Since 1973, the Idaho Conservation League (ICL) has been Idaho's voice for clean water, clean air and public lands. The Idaho Conservation League works to protect these values through education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters who have a deep personal interest in protecting our land, water, fish, and wildlife. The Yellowstone grizzly is an iconic carnivore that is important to many Idahoans as well as many Americans. The continued preservation of this species is imperative for a functioning and healthy Greater Yellowstone Ecosystem. The restoration of the Yellowstone grizzly bear from an estimated 138 individuals to a now estimated 700 individuals represents a success story for the Endangered Species Act. Without the concerted effort from federal, state, and tribal wildlife management entities, this success would not have been possible. In order for this success story to continue into the future, we believe that strong state-based conservation planning must be in place. While there may be a time in the near future where de-listing could happen, we do not believe the necessary sideboards are in place now for that to occur. In addition to needed amendments to state-based grizzly bear management policy, federal land management plans also need to be updated to mitigate risks to grizzly bears from human caused mortality and livestock conflict. Until these two things happen, we advise the U.S Fish and Wildlife Service (USFWS) to not de-list the Yellowstone grizzly bear. Attachments ICL comments on USFWS proposal to delist Yellowstone grizzly bear	FWS-R6-ES-2016-0042-5391
HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. These states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains.			Factor D	There are many reasons I feel that this rule should not be passed, below are the most important ones to me. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. These states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. Every animal on this planet was put here by GOD and DESERVES to be here. Granted not everyone cares about this but remember animals have been here as long if not longer than humans. They are not destroying this planet humans ARE - BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. Many people are so obsessed with KILLING that they don't care about what they are doing to the future of this planet or what kind of world the future generations are going to be left with. - MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. I am tired of the MAJORITY desire of this country being thrown aside.	FWS-R6-ES-2016-0042-1415

HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. Montana, Wyoming and Idaho have shown themselves to be incredibly hostile toward predators. Bears trying to disperse have become victims of trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. Such is likely to be the norm after delisting. Any bear that has it's den outside the Grand Teton Park, Yellowstone Park, or on national forest lands, there is a good chance that these bears will be killed by hunters. This happened in November 2015 in Montana at the northern edge of the Yellowstone Ecosystem when a hunter, claiming self defense without proof of any aggression shown by the bear, shot and killed with one bullet, Grizzly #211, also known as Scarface, an aged grizzly (26 plus years) who happened to be in poor health. To add insult to the poaching of #211, the State of Montana withheld media release of this incident until after the comment period for the Delisting Grizzlies proposal was passed. This is exactly the kind of thing that removing Grizzlies from the Endangered List will become the norm for Montana, Wyoming and Idaho, under the guise of protecting the bears. The only protections these states want is to line their state coffers by the trophy hunters.			Factor D	My position on the proposed rule concerning the Removal of Grizzly Bears from the Greater Yellowstone Ecosystem from the Endangered and Threatened Wildlife list is as follows: - The proposed rule does nothing to address the lack of an adequate grizzly gene pool in the Yellowstone area. The existing grizzly population is to small and lacks access to other populations north of this ecosystem. There currently are no plans between Montana, Idaho or Wyoming to provide the means for grizzlies to reach other bear populations which would give them the opportunity to improve the biological diversity. - DECLINING FOOD SOURCES: It has been documented by Wildlife Management teams that grizzlies main food sources have been wiped out due to climate change (whitebark pine), invasive species (cutthroat trout) and use of pesticides in/and near the Yellowstone Ecosystem (moths). While some waterways are being restocked with cutthroat trout, this is only a part of the necessary diet for grizzly bears. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. Montana, Wyoming and Idaho have shown themselves to be incredibly hostile toward predators. Bears trying to disperse have become victims of trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. Such is likely to be the norm after delisting. Any bear that has it's den outside the Grand Teton Park, Yellowstone Park, or on national forest lands, there is a good chance that these bears will be killed by hunters. This happened in November 2015 in Montana at the northern edge of the Yellowstone Ecosystem when a hunter, claiming self defense without proof of any aggression shown by the bear, shot and killed with one bullet, Grizzly #211, also known as Scarface, an aged grizzly (26 plus years) who happened to be in poor health. To add insult to the poaching of #211, the State of Montana withheld media release of this incident until after the comment period for the Delisting Grizzlies proposal was passed. This is exactly the kind of thing that removing Grizzlies from the Endangered List will become the norm for Montana, Wyoming and Idaho, under the guise of protecting the bears. The only protections these states want is to line their state coffers by the trophy hunters. - MOST AMERICANS OPPOSE DELISTING. Fifty-five percent of Americans are opposed to ending federal protections for the region's grizzly bears, and by a 3-to-1 margin people oppose grizzly hunting, a new poll conducted by Remington Research Group commissioned by the Humane Society of the United States and Wyoming Wildlife Advocates. - BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. As stated above, grizzlies are already being slaughtered by hunters. The claim of self-defense has yet to be verified, even after 5 months of investigation. If the Grizzly bear is delisted, further conflict with humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population.	FWS-R6-ES-2016-0042-1550
In my opinion, the most integral consideration in the decision to delist the GYE grizzly population is whether the decision is a reasonable interpretation of the congressional intent of the Endangered Species Act. The ESA states that conservation programs should be developed by States and other interested entities to "better safeguard, for the benefit of all citizens, the Nation's heritage in fish, wildlife, and plants." As the Service is well aware, U.S. History is full of a paucity of examples where state entities have allowed wildlife species within their jurisdiction to become extinct, or be threatened with extinction, before the federal government intervenes. The passenger pigeon, bison, California condor, and grizzlies are just a few of the more well known examples of this phenomena. The management framework that the GYE states must adopt if delisting occurs, will be critical in determining whether grizzly bears will continue to be able to thrive in the Yellowstone area. If the management framework is insufficient to keep the GYE grizzly population within management objectives, further intervention by the Service will be necessary, at increased social/economic/ecological costs.			Factor D	Attachments Proposed Rule Comment	FWS-R6-ES-2016-0042-1585
Until a comprehensive bear management plan is put in place and agreed to by Wyoming, Montana, and Idaho, it would be irresponsible to delist the grizzlies. Taking the bears off the list means that they'll once again be hunted, something we are firmly against.			Factor D	Our family frequently visits Wyoming and Yellowstone National Park. We care about all the animals in the state and we were happy to learn the grizzly bear population is thriving thanks to the Endangered Species Act. However, we were unhappy to learn that the Fish and Wildlife Service is considering taking grizzlies off the Endangered Species List. Until a comprehensive bear management plan is put in place and agreed to by Wyoming, Montana, and Idaho, it would be irresponsible to delist the grizzlies. Taking the bears off the list means that they'll once again be hunted, something we are firmly against. Please show us that the safeguards are in place for these magnificent bears to continue thriving before removing them from the list.	FWS-R6-ES-2016-0042-1831
Frustratingly, this draft rule released for public review is incomplete, it fails to provide details that will impact bears in our national parks. It also relies on outdated state plans, one a decade old, for grizzly management. The draft rule is missing critical information to outline how state agencies will partner with the National Park Service, in addressing bear management on lands adjacent to national parks. It is extremely concerning that this draft rule fails to address hunting inside of the John D. Rockefeller Parkway, key habitat connecting bears between Grand Teton and Yellowstone National Parks. Under the current proposal, hunting could occur on lands directly adjacent to national parks as well as key habitat that could link Yellowstone's grizzly bears to grizzlies from GNP.			Factor D	As trained scientist, physician and someone that has been following the science related to Grizzlies, I'm opposed to delisting the GYE Grizzly bears because the plan is inadequate and does not account for the many challenges this population will continue to face. Grizzlies are a keystone species of our national parks and wild places, making the U.S Fish and Wildlife Service's proposal to remove the Greater Yellowstone Ecosystem grizzly from the Endangered Species List a serious concern. The post-delisting management of bears must be based on sound science and provide adequate protections to ensure the long-term survival of this iconic population. Frustratingly, this draft rule released for public review is incomplete, it fails to provide details that will impact bears in our national parks. It also relies on outdated state plans, one a decade old, for grizzly management. The draft rule is missing critical information to outline how state agencies will partner with the National Park Service, in addressing bear management on lands adjacent to national parks. It is extremely concerning that this draft rule fails to address hunting inside of the John D. Rockefeller Parkway, key habitat connecting bears between Grand Teton and Yellowstone National Parks. Under the current proposal, hunting could occur on lands directly adjacent to national parks as well as key habitat that could link Yellowstone's grizzly bears to grizzlies from GNP. We have spent millions of dollars to restore grizzly bears to GYE and we must continue these conservation efforts in perpetuity, preserving the important roles they play in maintaining healthy and diverse environments. Rather than delisting grizzlies and opening up hunting immediately - our efforts should be focused on connecting this isolated genetic population to grizzlies in the North.	FWS-R6-ES-2016-0042-1910

The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. The population will decline after delisting, and cannot be sustained without life-support measures.			Factor D	The proposal to delist Yellowstone Grizzly Bears is irresponsible and will result in the decimation of our Country's iconic symbol of the West. For the following reasons below the proposal to delist must be abandoned: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. 2. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout. 3. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. The population will decline after delisting, and cannot be sustained without life-support measures. 4. The delisting plan fails to address issues associated with high, ongoing human caused grizzly bear mortality. Most of the grizzly bears that die in the Greater Yellowstone Ecosystem die of human causes, and most are avoidable. While Yellowstone Park and some communities outside the park have gone to enormous measures to remove grizzly bear attractants, others have not. The problem of mortality of food-habituated bears will only get worse after delisting, when allowable mortality levels are raised, and resources for conflict resolution are reduced. Because problem grizzly bears are a human safety problem, it only makes sense to resolve the ongoing sanitation issues in the ecosystem before delisting. 5. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public. 6. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources. Please keep the Yellowstone Grizzlies protected! Do not delist them!	FWS-R6-ES-2016-0042-1912
The turning over of Grizzly Bear management to the states surrounding is a gross mistake. Look how they managed Grey Wolves it is nothing but an attack to eliminate them. I think it is important to keep them listed up until we have had a chance to reform state wildlife management, because state management is such a poor alternative. It's a really poor alternative at a time when the population is becoming increasingly vulnerable.			Factor D	Delisting of the Greater Yellowstone Grizzly Bear is just a political ploy to appease the state governments of Wyoming, Montana, and the "Trophy Hunting" community. A live Grizzly Bear is worth far economically to these states and communities adjacent to Yellowstone Park than the revenue from a hunting license and a Grizzly Bear rug hanging on some hunters wall. There is absolutely no consensus on the size of the grizzly bear population in Yellowstone. There are some estimates, and all of those estimates are beset by bias of one sort or another. On the one hand you'll hear them claiming there's a thousand bears, based on use of one method. On the other hand they'll say there's 700 bears, based on the use of a different estimator altogether. The carrying capacity is not static, it's not a constant. It varies hugely, and I would argue that because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millennial drought which is promising more of the same to come, that we've seen a decline in carrying capacity. And so it's probably no surprise that the bear population is bumping its head up against carrying capacity. In fact, what we've had is a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods making them look outside of Yellowstone. The turning over of Grizzly Bear management to the states surrounding is a gross mistake. Look how they managed Grey Wolves it is nothing but an attack to eliminate them. I think it is important to keep them listed up until we have had a chance to reform state wildlife management, because state management is such a poor alternative. It's a really poor alternative at a time when the population is becoming increasingly vulnerable. I am would be willing to predict is that if you wait two years out into the future using the exact same methods you're using now, the population estimate will be down to 600, at which point, even by your reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using your methods. Under a scenario like that, with the drivers afoot leading to elevated grizzly bear mortality as-is, I don't think we can afford to have any increase in mortality for any reason at all. There is another key reason that is being completely overlooked. None of your documents even acknowledge the spiritual importance to the Native American the significance of the Grizzly Bear to their culture. Doing so continues to keep Native Americans second class citizens in this country where all men are created equal	FWS-R6-ES-2016-0042-2000
Funding to address these increasing risks are not available to either the three states nor to the federal land management agencies where these bears reside. Nor is it likely that funding will be made available to the states or federal land management agencies in the future to address these increasing risks.			Factor D	While I was the BLM Dillon Field Manager, I served as the Montana BLM representative to the IGBC Yellowstone Ecosystem Subcommittee for ten years (2002-2012). Great strides have been made in increasing the Yellowstone sub population of Grizzly Bears, however more work is needed to reduce threats to this population of Grizzly Bears. Reduced high value food supplies due to the loss of Yellowstone Cutthroat Trout, Whitebark Pine Nuts, and the significant reduction in the Yellowstone Northern Elk Herd have decreased the upward trajectory of this population of Grizzly Bears. In fact the population increase has been static for the last ten years while human caused threats identified have not been addressed. This has resulted in increased mortality that cannot sustain the population long term. Increased human population, especially to the north and east of Yellowstone National Park has resulted in increased hunting pressure on Elk resulting in Grizzly Bear deaths due to conflicts with Grizzly Bears during hunting season. Continued domestic sheep grazing on USDA public lands in the Centennial and Gravelly Mountains of Southwest Montana have resulted in Grizzly Bear deaths and are prohibiting the genetic connection between the Northern Continental Divide and Yellowstone Ecosystems. Sport hunting of the Yellowstone Grizzly Bear cannot be justified due to increase risks that are not addressed and increasing mortality of these bears. Funding to address these increasing risks are not available to either the three states nor to the federal land management agencies where these bears reside. Nor is it likely that funding will be made available to the states or federal land management agencies in the future to address these increasing risks. States dont even require hunters to carry bear spray while hunting big game in hunting units occupied by grizzly bears. Until there is a substantial increase in the efforts to reduce risks to the Yellowstone Grizzly Bear I dont believe the Yellowstone Grizzly should be delisted.	FWS-R6-ES-2016-0042-1958
Existing state management plans are inadequate to protect Yellowstone grizzly bears to allow them to connect to other grizzly populations.			Factor D	Please reconsider removing Grizzly Bears from the Federal List of Endangered and Threatened Wildlife due to: The growth rate of the Greater Yellowstone Area grizzly bear population has been flat since the early 2000s and fewer cubs and yearlings are surviving. Grizzly bears in the Yellowstone region are still completely isolated from other grizzly bear populations, both geographically and demographically, as they have been for 100 years. Existing state management plans are inadequate to protect Yellowstone grizzly bears to allow them to connect to other grizzly populations. Not to become trophy hunter conquests. Please allow them to thrive.	FWS-R6-ES-2016-0042-2479

Given the fact that the states are going to institute a sports hunt the minute the animal is removed from the list, and the death of Yellowstone's famous Grizzly, Scarface, by shotgun is proof that they can't wait for this to happen, and is another reason to leave the bear on the list. In addition to hunting bears for sport, ranchers will feel more free to kill bears and call them "nuisance animals". They must be protected from humans who will kill them simply to protect their financial interests.			Factor D	The Grizzly Bear should not be removed from the Federal List of Endangered and Threatened Wildlife. The studies in the federal report recommending delisting have not undergone rigorous review by outside scientists and have not been published in scientific journals. This is considered a crucial step in validating scientific research and must not be skipped. Given the fact that the states are going to institute a sports hunt the minute the animal is removed from the list, and the death of Yellowstone's famous Grizzly, Scarface, by shotgun is proof that they can't wait for this to happen, and is another reason to leave the bear on the list. In addition to hunting bears for sport, ranchers will feel more free to kill bears and call them "nuisance animals". They must be protected from humans who will kill them simply to protect their financial interests. According to many scientists, federal protection makes it more likely that bears can continue to spread out into areas known to be suitable for bears. A wider range for the bear, could bring the Yellowstone population into contact with other grizzly populations, making all of the populations less vulnerable in the long haul to starvation, disease and their top predator - man.	FWS-R6-ES-2016-0042-2575
Existing state management plans will not protect Yellowstone grizzly bears and will not allow them to connect to other grizzly populations if they are delisted now. Wyoming, Montana, and Idaho, the three states where Yellowstone grizzly bears live, plan to immediately initiate sport hunting of grizzly bears as soon as they are delisted.Fact: Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600.			Factor D	I agree with the delisting of the Grizzly bear and opening a hunting season on them. Please Reference: According to Yellowstone National Park, over the last 40 years the grizzly population there has grown from 136 to a stable population of somewhere between 674 and 839 The recovery population goal was 500 and was actually met in 1999. The grizzly bears in the Yellowstone area had been removed from the list in 2007 but in 2009 a 9th Circuit federal judge ordered that they be put back on, citing the decline of the whitebark pine tree, whose pine cone nuts were seen as a critical part of the grizzly diet. However, the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered.. Predictably, the Sierra Club and some other groups are opposing the delisting. Here are the objections listed by the Sierra Club in an August 2015 article. The growth rate of the Greater Yellowstone grizzly bear population has been flat since the early 2000s, and may be in decline. Fewer cubs and yearlings are surviving to adulthood. Fact: Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said the reason the population is leveling out is that bear density has reached the carrying capacity for the range. Fact: the number of female grizzlies with cubs in the Yellowstone ecosystem was the highest ever recorded ever counted in 2013. Grizzly bears in the Yellowstone region are completely isolated from other grizzly bear populations, both geographically and demographically, as they have been for 100 years. Fact: Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000 - also likely to be proposed for delisting), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. Existing state management plans will not protect Yellowstone grizzly bears and will not allow them to connect to other grizzly populations if they are delisted now. Wyoming, Montana, and Idaho, the three states where Yellowstone grizzly bears live, plan to immediately initiate sport hunting of grizzly bears as soon as they are delisted. Fact: Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600. Courts have ruled that the U.S. Fish and Wildlife Service must consider the overall recovery of the species as it was originally listed under the Endangered Species Act, and may not delist isolated segments of the species (such as the Greater Yellowstone grizzly population) one at a time. Fact: This is a stalling tactic. Not all courts agree on any issue, especially since judge-shopping has become a common legal tactic, especially by activists. And, of course, not all areas see population recovery at the same rate. Opponents also say that the number of human-bear contacts must be reduced before the grizzly bear can be taken off the endangered list. But precautions are already in place and allowing the population to increase by preventing hunting would lead to more interactions, not fewer. Another opponent, The Greater Yellowstone Coalition, wants a delisting that has the bears managed as one population. ~~OK Idaho, Montana and Wyoming have written a joint plan for not delisting management of grizzlies. The facts are on our side.~~	FWS-R6-ES-2016-0042-2520
4. Delisting relies on habitat management plans which are not yet in place. Forest Service has not yet finalized its forest plan amendments. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Under the new Bush administration rules, forest plan standards will be discretionary, rather than mandatory. That means that the Forest Service will enforce the rules if it feels like it. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding.			Factor D	1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. Forest Service has not yet finalized its forest plan amendments. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Under the new Bush administration rules, forest plan standards will be discretionary, rather than mandatory. That means that the Forest Service will enforce the rules if it feels like it. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. These lands include some of the most threatened habitat in the GYE, especially by energy development in Wyoming. 7. The plan lacks adequate funding mechanisms and ~~fail to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.7 million per year in addition to what is~~	FWS-R6-ES-2016-0042-2754
1. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly oppose delisting and hunting of these bears, which they consider to be sacred animals. We need to listen to them.			Factor D	As someone who has enjoyed the GTNP for over 30 years. I'm very concerned about the proposed delisting. Here are a few more reasons not to delist the Grizzlies, Please consider. 1. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly oppose delisting and hunting of these bears, which they consider to be sacred animals. We need to listen to them. 2. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted.	FWS-R6-ES-2016-0042-3087

Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publicly stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat x and prevent them from colonizing other lands in which they were originally found. This "discouragement" will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of the land grizzlies would be "discouraged" from is public land in which grizzlies should be allowed to survive and thrive.			Factor D	I live within the Greater Yellowstone Ecosystem (GYE) and am apposed to delisting grizzly bears in the GYE for the following reasons: 1. Fact is, no one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services computer generated numbers. But, what we do emphatically know is that at least 60 grizzlies died last year and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest reproductive rate of any mammal in the GYE. The continuation of such high mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work is needed in the GYE to prevent many of unnecessary grizzly deaths before this population can be safely delisted. Such actions as requiring ranchers to relocate their garbage and carcass dumps to secure county facilities, the use of bear-proof garbage cans in communities within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for public land users, and stiffer penalties for illegal killings need to be employed within the GYE prior to grizzlies being delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate grizzlies from other populations into the GYE to improve genetic diversity, but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publicly stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat and prevent them from colonizing other lands in which they were originally found. This "discouragement" will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of the land grizzlies would be "discouraged" from is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. For the future survival of this isolated population occupation of additional habitat is crucial to their long-term survival. In this case, size does matter! Additional habitat will likely incorporate additional diversity of habitat types and harbor a greater variety food sources for grizzlies. Providing additional habitat to these large carnivores with enormous territorial needs is essential to their long-term survival. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout, and even army cutworm moth populations (due to Midwest famers spraying the larvae with insecticides) have all been noted. These high calorie food deficits represent a severe loss for those grizzlies that once feasted on these nutritional foods. More research is needed to determine how the loss of these food sources (and likely others) will impact the future GYE grizzly population. Add in drought and climate change and much more information needs to be obtained to determine how all these factors will impact the future of the GYE grizzly population. 4. GYE Grizzlies should be managed as an ecosystem population rather than separately by three different state agencies all of which are subject to heavy political pressures from those wanting to rid the area of grizzlies and all of which have stated their intent to significantly reduce the population and limit their occupied habitat. The Fish & Wildlife Service indicates that the bears are expected to adapt and cope with these new realities. Shouldn't we too, with our very large brains, be expected to adapt to grizzlies? Many peoples around the world have learned how to cooperatively live with bears. People living in the GYE can too.	FWS-R6-ES-2016-0042-3124
4. GYE Grizzlies should be managed as an ecosystem population rather than separately by three different state agencies all of which are subject to heavy political pressures from those wanting to rid the area of grizzlies and all of which have stated their intent to significantly reduce the population and limit their occupied habitat. The Fish & Wildlife Service indicates that the bears are expected to adapt and cope with these new realities. Shouldn't we too, with our very large brains, be expected to adapt to grizzlies? Many peoples around the world have learned how to cooperatively live with bears. People living in the GYE can too.			Factor D	I live within the Greater Yellowstone Ecosystem (GYE) and am apposed to delisting grizzly bears in the GYE for the following reasons: 1. Fact is, no one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services computer generated numbers. But, what we do emphatically know is that at least 60 grizzlies died last year and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest reproductive rate of any mammal in the GYE. The continuation of such high mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work is needed in the GYE to prevent many of unnecessary grizzly deaths before this population can be safely delisted. Such actions as requiring ranchers to relocate their garbage and carcass dumps to secure county facilities, the use of bear-proof garbage cans in communities within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for public land users, and stiffer penalties for illegal killings need to be employed within the GYE prior to grizzlies being delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate grizzlies from other populations into the GYE to improve genetic diversity, but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publicly stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat and prevent them from colonizing other lands in which they were originally found. This "discouragement" will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of the land grizzlies would be "discouraged" from is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. For the future survival of this isolated population occupation of additional habitat is crucial to their long-term survival. In this case, size does matter! Additional habitat will likely incorporate additional diversity of habitat types and harbor a greater variety food sources for grizzlies. Providing additional habitat to these large carnivores with enormous territorial needs is essential to their long-term survival. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout, and even army cutworm moth populations (due to Midwest famers spraying the larvae with insecticides) have all been noted. These high calorie food deficits represent a severe loss for those grizzlies that once feasted on these nutritional foods. More research is needed to determine how the loss of these food sources (and likely others) will impact the future GYE grizzly population. Add in drought and climate change and much more information needs to be obtained to determine how all these factors will impact the future of the GYE grizzly population. 4. GYE Grizzlies should be managed as an ecosystem population rather than separately by three different state agencies all of which are subject to heavy political pressures from those wanting to rid the area of grizzlies and all of which have stated their intent to significantly reduce the population and limit their occupied habitat. The Fish & Wildlife Service indicates that the bears are expected to adapt and cope with these new realities. Shouldn't we too, with our very large brains, be expected to adapt to grizzlies? Many peoples around the world have learned how to cooperatively live with bears. People living in the GYE can too.	FWS-R6-ES-2016-0042-3124
The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that FoA and local tribes, oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. Å			Factor D	Delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that FoA and local tribes, oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. We cannot let human behavior and stupidity jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. - See more at: https://secure.friendsofanimals.org/news/2016/may/tell-usfws-not-remove-protections-yellowstone-grizzly-bear#sthash.AacFEZ1q.dpuf	FWS-R6-ES-2016-0042-3389
Carrying capacity The Rule is based on unsubstantiated interpretations & assumptions that the expanding range of Yellowstone's grizzlies is indication grizzlies have reached a static carrying capacity (ref. Fig. 1 p 13180, of The Rule). There are a number of alternative hypotheses that have not been researched appropriately in The Rule; the carrying capacity itself has been reduced, primarily as a result of declining food resources. Alternative hypotheses must be fully explored to satisfy the requirement for an evidence-based decision as required by law.			Factor D	Please see below Attachments 160507 Grizzly bears	FWS-R6-ES-2016-0042-3400

State regulatory commitments clearly are not in place and are not explained. The Rule indicates over and over that viable state regulatory commitments must be in place before delisting can occur. However, the commitments are not detailed, not explained, and clearly are not binding. One of the publics biggest concerns appears to be the proposed hunting of grizzlies on the 12% of suitable habitat outside of park boundaries. What portion of the population is on the 12% outside boundaries? Whats the expectation of how much of the population will be exposed to potential hunting? What are the anticipated state commitments to ensure appropriate and sustainable hunting practices? None of this is detailed in the Rule. Further, it goes without saying that a decision to vest with the states the future of a threatened species, when those very states allowed the initial devastation to the population, is suspect. Particularly in the absence of detailed commitments and lack of enforceability. To the extent there is an inclination to trust the state wildlife agencies to manage the population, the states have already indicated that it will be open season on the population. In the event of an unacceptable numerical mortality impact on the population, the Rules proposed solution is to call a meeting and discuss potential relisting. But thats no solution at all. Meaningful commitments, and meaningful accountability, need to be in place and they clearly are not.			Factor D	I strongly OPPOSE the planned delisting of Yellowstone area grizzly bears under the terms of the proposed rule for the following reasons: I. The conclusions set forth in the Rule are not supported by the facts relied on by the Service. The Rule asserts the GYE population of grizzlies is recovered, sustainable, and will not be adversely impacted by the anticipated mortality resulting from hunting and management. However, the numbers dont add up. When you add the acknowledged slow down in growth due to white bark pine, which has cut population growth by 96% (7% to .3% on the high end), then add the 20% expected mortality from hunting, you are effectively imposing a cull on the GYE grizzly population. A population which the Rule never suggests is excessive. The Rule only suggests the population is now at carrying capacity. Add to this the 25 grizzlies killed by wildlife managers last year alone and the Rule clearly sets up a dramatic and adverse reduction in population numbers. Further, despite the white bark pine issue being critical to the 9th Circuits conclusion to prevent delisting, the Rule dismisses the impact of white bark pine with almost no substantive explanation. The Rule simply characterizes population slow down as carrying capacity without any meaningful explanation (or effort to refute) the correlation between population trend and availability of critical food sources. Further, the Rule acknowledges only one third of the population doesnt eat white bark pine; the other two thirds of the population do. The Service is required to treat the population as a whole, and the majority relies on white bark pine. It appears there is still a significant amount of uncertainty regarding the factors which prevented delisting the first time around and the Rule offers only a very superficial effort to dismiss the shortcomings this time. The conclusions therefore are not reasonable and not based on the best available science. As the Service (and the courts) are aware, the Service is mandated to proceed with institutionalized caution. Its neither legally nor morally sound to simply roll the dice with the future of a threatened species. II. State regulatory commitments clearly are not in place and are not explained. The Rule indicates over and over that viable state regulatory commitments must be in place before delisting can occur. However, the commitments are not detailed, not explained, and clearly are not binding. One of the publics biggest concerns appears to be the proposed hunting of grizzlies on the 12% of suitable habitat outside of park boundaries. What portion of the population is on the 12% outside boundaries? Whats the expectation of how much of the population will be exposed to potential hunting? What are the anticipated state commitments to ensure appropriate and sustainable hunting practices? None of this is detailed in the Rule. Further, it goes without saying that a decision to vest with the states the future of a threatened species, when those very states allowed the initial devastation to the population, is suspect. Particularly in the absence of detailed commitments and lack of enforceability. To the extent there is an inclination to trust the state wildlife agencies to manage the population, the states have already indicated that it will be open season on the population. In the event of an unacceptable numerical mortality impact on the population, the Rules proposed solution is to call a meeting and discuss potential relisting. But thats no solution at all. Meaningful commitments, and meaningful accountability, need to be in place and they clearly are not. III. Sport hunting of a threatened population is simply unacceptable. Given the historical backdrop of how these animals were wiped out through hunting and trapping, both for sport and in defense of stock, the notion of reintroducing recreational hunting is unacceptable and entirely inconsistent with	FWS-R6-ES-2016-0042-4257
Are there inadequate existing regulatory mechanisms in place outside the ESA (taking into account the efforts by the States and other organizations to protect the species or habitat)? (Perhaps. But we know how that goes. Look at Florida's massive bear hunt.)			Factor D	Please don't remove this beautiful and iconic species from the list. Your criteria (http://nctc.fws.gov/pubs9/delisting.pdf): Is there a present or threatened destruction, modification, or curtailment of species' habitat or range? (In some cases, yes.) Is species subject to overutilization for commercial, recreational, scientific, or educational purposes? (Hunting is, arguably, recreational utilization; so, yes.) Is disease or predation a factor? (If hunting is counted as predation, yes.) Are there inadequate existing regulatory mechanisms in place outside the ESA (taking into account the efforts by the States and other organizations to protect the species or habitat)? (Perhaps. But we know how that goes. Look at Florida's massive bear hunt.) Are other natural or manmade factors affecting its continued existence? (Agriculture. Tourism. Hunting. Yes.) People already camp right at the park borders to snipe wolves as they cross the invisible boundary into unprotected space. We all know what's going to happen to the bears as soon as they lose their protected status. Every trophy hunter will be standing in line to take one down. California lost it's great bears and wolves years ago. It would be a tremendous shame to see it happen elsewhere. https://youtu.be/oZ7ISGxGue0	FWS-R6-ES-2016-0042-4583
In accordance to the population ecology background, density-dependent and density-independent factors can regulate a population size (42 USC 4321-4370 1969). Intraspecific killing has been occurring as a density-dependent factor within the population; two bears were killed by other bears in 2014 (IGBST 2014). There has been an increase in home range-size as the species population grows, bears have to travel further to obtain food. The research accomplished by the IGBST has easily made the GYE grizzly bear population the most studied North American species (IGBST 2014). Grizzly bears will continue to be monitored and managed but with more authority from State and Tribal agencies.			Factor D	The notion of delisting grizzly bears (<i>Ursus arctos horribilis</i>) from the Endangered Species List has been important to concerned Wyoming residents for quite some time now. I grew up in Cody, Wyoming where I have hunted, fished and travelled horseback through most of the Shoshone National Forest and Absaroka Wilderness. As a hunter and conservationist, I have personally witnessed part of the recovery of this species and believe that the population has recovered and this proposed rule should be made final. This docket was prepared in regards to the growing population of grizzly bears in the Greater Yellowstone Ecosystem (GYE). In compliance with the National Environmental Policy Act (NEPA), this statement is in the proposed rule for public comment (42 USC 4321-4370 1969). Livestock and human conflicts have been increasing every year (WGFD 2015). The planning within this document provides adequate data to prove that grizzlies have recovered and are at their carrying capacity for the Greater Yellowstone Ecosystem. With help from State and Tribal agencies and the Interagency Grizzly Bear Study Team (IGBST), the USFWS has shown that grizzlies can be delisted (42 USC 4321-4370 1969) and should be managed by State and Tribal governments. In accordance to the population ecology background, density-dependent and density-independent factors can regulate a population size (42 USC 4321-4370 1969). Intraspecific killing has been occurring as a density-dependent factor within the population; two bears were killed by other bears in 2014 (IGBST 2014). There has been an increase in home range-size as the species population grows, bears have to travel further to obtain food. The research accomplished by the IGBST has easily made the GYE grizzly bear population the most studied North American species (IGBST 2014). Grizzly bears will continue to be monitored and managed but with more authority from State and Tribal agencies. Concerns of Factor A The six recovery ecosystems of bear populations are an acceptable way to monitor the total population. However, with the movement of individual bears, it may be hard to identify total state populations at a given time (WGFD 2016). Yes, some of these bears are collared by state agencies but from experience, not every bear can and will be collared (Turnbull 2015). If the allowable number of total mortalities for independent females cannot exceed 7.6%, 15% for independent males and 7.6% for dependent young, each states harvest quota for mortality will have to continually change during the harvest season. Quotas should be established at the beginning of a hunting season and remain the same throughout the season based on previous estimated population size in each state. The Demographic Monitoring Area (DMA) includes Wyoming, Montana and Idaho and poses variability for harvest quotas. Concerns of Factor D During years of low productivity of high calorie foods for bears, bears will be more apt to move further in search of food. Whitebark pine nut seed availability can be a leading factor in calorie intake for grizzly bears in the fall. If bears move lower in elevation to search for food, human conflicts may very well increase in these years (Turnbull 2015). There should be an amendment for low productive years that would increase the quotas for harvest due to accidental mortalities of bears. The current population of grizzlies is well above the recovery requirement so fluctuations in harvest quotas would not have a large negative impact. In low productivity years, the total mortalities could be increased by 25 percent in order to lower natural deaths within the population and allow for harvest to occur. Grizzly bear health would be benefited within individuals and the population. Monitoring of grizzly bear food sources will need to continue to secure the study of the population will remain ideal. The delisting	FWS-R6-ES-2016-0042-4361

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As a citizen who cares deeply about our nation's wildlife, grizzly bears, and hard-fought conservation successes such as this one, I want to be assured that the states and federal land management agencies including the U.S. Forest Service will manage bears and their habitat in a way that ensures a healthy and expanding grizzly bear population into the future. I am seriously concerned that the U.S. Fish and Wildlife Service (USFWS) does not have all the required information and assurances finalized to make an informed decision. Then I say the Earth belongs to each generation during its course, fully and in its own right, no generation can contract debts greater than may be paid during the course of its own existence. Thomas Jefferson Specifically, the Endangered Species Act requires that, before delisting can occur among other things there are adequate regulatory mechanisms in place to ensure that the grizzly bear does not slip back towards extinction. These regulatory mechanisms are the responsibility of the states of Wyoming, Montana, and Idaho and the appropriate federal land management agencies. However, the necessary management plans that provide these commitments have not been finalized nor provided by the USFWS for review with the proposal. As we peer into society's future, we, you and I, and our government must avoid the impulse to live only for today, plundering for our own ease and convenience the precious resources of tomorrow. We cannot mortgage the material assets of our grandchildren without risking the loss also of their political and spiritual heritage. We want democracy to survive for all generations to come, not to become the insolvent phantom of tomorrow. Dwight D. Eisenhower Management of grizzly bears outside of the national parks would be left completely up to the states, which have historically been hostile to bears and other large carnivores. Wyoming has yet to finalize a revised grizzly bear state management plan, and the recently completed draft is not consistent with statements made in the delisting proposal. It is unclear when Idaho or Montana will update their management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the adequate regulatory mechanisms that are required. What is the nature of a species that knowingly and without good reason exterminates another? George Small The proposed rule leaves Greater Yellowstone grizzlies in the crosshairs, as states have made clear their plans to reduce the population, including through trophy hunts. The current proposal would allow states to exceed maximum bear deaths for years before any review allowing for potentially irreversible damage and would allow complete eradication of bears in some areas. The loss of female grizzlies to trophy hunters who will not be able to tell the difference between a male and female bear could cause a steep, quick decline before emergency action can be taken. It is our task in our time and in our generation, to hand down undiminished to those who come after us, as was handed down to us by those who went before, the natural wealth and beauty which is ours. John F. Kennedy			Factor D	See attached file(s) Attachments 160509_fws-r6-es-2016-0042-0001_keep_esa_protections_for_yellowstone_grizzlies	FWS-R6-ES-2016-0042-4459
The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm.			Factor D	The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. -The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. -The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). -USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat.	FWS-R6-ES-2016-0042-4717

Additionally, the Yellowstone grizzly population remains isolated. further limiting their range and numbers could prevent them from ever connecting to other grizzly populations. With development increasing in the Northern Rockies region, public lands are critical for providing essential secure habitat for grizzly bears into the future. The agencies in charge of our public lands have an obligation to ensure that an iconicspecies like the grizzly bear can continue to thrive. However, the U.S. Forest Service has not revealed when it will amend the management plans of the six national forests surrounding Yellowstone to provide for adequate habitat protections for grizzly bears post-delisting or when this process would be available for public review. â€œNothing is more priceless and more worthy of preservation than the rich array of animal life with which our country has been blessed.â€- Richard Nixon, on signing the Endangered Species Act on December 28, 1973			Factor D	See attached file(s) Attachments 160509_fws-r6-es-2016-0042-0001_keep_esa_protections_for_yellowstone_grizzlies	FWS-R6-ES-2016-0042-4459
The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001).			Factor D	The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. -The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. -The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). -USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat.	FWS-R6-ES-2016-0042-4717
NEARLY 50 TRIBES OPPOSE DELISTING OF GRIZZLIES. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly oppose delisting and hunting of these bears, which they consider to be sacred animals. Â			Factor D	There are several reasons to not delist the Grizzly Bear: The proposed rule does not address genetic isolation of the bears. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - Declining food sources. Historically bears dependent on 4 food sources - 2 of which (whitebark pine and cutthroat trout) are disappearing and moths, their third main food source, are unreliable food source due to pesticides. - Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. - Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. - Grizzlies occupy only 1% of their historic range. - Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. - If hunting is allowed, there should be a 5-year moratorium on hunting until states can prove that they can manage the grizzly population effectively. - If hunting is allowed, there must be buffer zones around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park. - DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states known for their hatred and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and most Americans (55%) oppose delisting. Even more Americans (68%) oppose hunting of grizzly bears if delisted. - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to Wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears. - GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, it is particularly vulnerable to excessive killing by humans. Last year, saw 59 grizzlies killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow reproducing species. - NEARLY 50 TRIBES OPPOSE DELISTING OF GRIZZLIES. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly	FWS-R6-ES-2016-0042-4679

Asking for comments on this proposal is premature because state regulations for bears arenâ€™t in place, so itâ€™s impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. If the USFWS continues to insist on delisting the grizzly bear in the Greater Yellowstone Ecosystem, I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue by taking the following steps before finalizing it. - Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€”they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. - Please create a delay in the onset of any grizzly bear hunting for several years postdelisting to minimize mortality during the transition. - Please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. - Bear-human conflict resolution should emphasize nonlethal techniquesâ€”before lethal removal is allowedâ€”throughout the entire Greater Yellowstone Ecosystem. - Clearly articulate how climate change will impact grizzly bears’ habitat, food sources, and behavior, and how your proposal takes these changes into account. - Grizzly bears are a sensitive species and will always be conservation-reliant. Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting.			Factor D	See attached file(s) Attachments 160509_fws-r6-es-2016-0042-0001_keep_esa_protections_for_yellowstone_grizzlies	FWS-R6-ES-2016-0042-4459
I strongly oppose the delisting of grizzly bears in the Yellowstone Ecosystem and request that the U.S. Fish and Wildlife Service withdraw the proposal until such time as all the required state and federal management plans and other documents that detail how this population of grizzly bears and their habitat will be managed post-delisting are finalized. This is too important of a decision to make without a full understanding of how bears and their habitat will be managed once delisted. Furthermore, there is no reason to rush this process. â€œEvery man who appreciates the majesty and beauty of the wilderness and of wild life, should strike hands with the farsighted men who wish to preserve our material resources, in the effort to keep our forests and our game beasts, game-birds, and game-fishâ€”indeed, all the living creatures of prairie and woodland and seashoreâ€”from wanton destruction. Above all, we should realize that the effort toward this end is essentially a democratic movement.â€- Theodore Roosevelt			Factor D	See attached file(s) Attachments 160509_fws-r6-es-2016-0042-0001_keep_esa_protections_for_yellowstone_grizzlies	FWS-R6-ES-2016-0042-4459

Don't play to the pressure of the states of Montana, Idaho, or Wyoming as they have shown previous unacceptable management plans for other species - i.e wolves.			Factor D	As a trained conservationist, with a background in field biology work, I am adamantly opposed to this proposal. I have followed the research around Yellowstone grizzlies since college and am well aware of the issues affecting the Great Yellowstone Grizzly Bear population. This population of bears are an island population - there are significant barriers to this population being able to connect with other populations of bears due to habitat fragmentation which leads to genetic isolation and genetic inbreeding. Given the grizzlies slow reproduction rate, loss of food sources like the white bark pine nuts, potential declining populations of cutthroat trout due to climate change, habitat losses outside of the park, I feel that this proposal is ill advised. With the reintroduction of wolves, the ungulate population in parts of the of the Park appear to be in decline - another food source loss will potentially cause bears to roam farther in search of food. The unknown and potential flora losses, which are a large part of the bears diet, due to climate change cannot be overlooked and could contribute to further expansion of territories outside the Park. As a keystone species, the grizzlies influence on helping protect other sensitive species, like wolverines and lynx (as well as other non-mega fauna), is significant and crucial to species diversity in the northern Rockies. I lived in western Montana for 6 years and did field biology work, which involved direct interaction with the public, as well as working in the private sector during the winter months. The shoot, shovel and shut up mentality is still very much alive there with some of the population, which would be all to eager to illegally hunt bears. And that is to say nothing about the state governments in the area which can be heavily influenced by the cattle and timber extraction industries. I do not doubt that hunting grizzlies will be a trophy sport if the state is able to regulate the bear populations just like Idaho wants to do with wolves and grizzlies - and that is unacceptable on every level. The FWS is supposed to protect species in need for their benefit, regardless of political influence. Has the FWS looked at all the encompassing issues surrounding the bears? What about potential long term affects to the population? I believe that this has not happened. Don't play to the pressure of the states of Montana, Idaho, or Wyoming as they have shown previous unacceptable management plans for other species - i.e wolves. Delisting grizzlies in the Greater Yellowstone Ecosystem will have negative repercussions to that species, and many more. Please take the ecological high ground, the long term vision, and don't cave to political pressure. My family visits Yellowstone as much asd possible and my children would like to see a wild grizzly bear. They are depending on your agency to make the right choice. Please - do not delisit the Yellowstone grizzly bear. Look at the science not the politics.	FWS-R6-ES-2016-0042-4917
The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001).			Factor D	Grizzlies in the GYE are facing catastrophic losses to several of their key food sources, such as whitebark pine and cutthroat trout. The service's recent research on whitebark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy whitebark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals. Grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary. The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat.	FWS-R6-ES-2016-0042-4943

The Endangered Species Act requires tribal nations consultation and cooperation which the USFWS has NOT properly handled, managed, or considered.			Factor D As a wildlife biologist, I have worked with several USFWS Threatened and Endangered Species over the past 30 years, with several federal land management agencies. I absolutely disagree with the USFWS's totally premature and significantly and inadequately designed and planned proposal to delist the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Threatened Species Protections of the Endangered Species Act which the grizzly bears have been under for the last 40 years for these several important reasons. 1. While the numbers of grizzly bears in GYE are up since the low in the late 1970s and early 1980s, this has taken more than three decades of significant and serious legally established protections and considerable conservation efforts on many different levels. The delisting of GYE grizzly bears now, during increasing Climate Change uncertainty and scientifically accepted understanding of changing or reduced grizzly bear habitats including food, water and shelter resources would absolutely reduce the GYE grizzly bear population (likely other lower 48 grizzly bears and their populations too), and their conservation efforts and funding, which would definitely and significantly compromise the viability of these GYE grizzly bears in both the short-term, and the long-term for America's Future generations. All the important and comprehensive grizzly bear conservation measures must be established and in place before delisting proposal is considered, including all the funding, ecological, scientific, social, and economic issues and concerns. Unfortunately, none of these important conservation measures, issues, and concerns are adequately addressed yet, so this grizzly delisting proposal must not continue. 2. Unfortunately, after delisting, the likely legal hunting of grizzly bears in the states of ID, MT, and WY, would NOT be responsible or reasonable for the GYE grizzly bear population to continue to be healthy and viable. Also, unfortunately, the illegal killing of grizzly bears would significantly rise, especially with little or no funding, efforts or motivation to prosecute violations of important wildlife regulations. I am absolutely against any legal hunting of grizzly bears in the lower 48 contiguous United States for many responsible reasons, and especially for the hunting of grizzly bears would definitely be damaging to grizzly bear conservation and the GYE grizzly bear population would be significantly reduced. Any consideration or allowance of legal grizzly bear hunting in any state at anytime in the future must absolutely be denied before proposal is reasonable, responsible, or expectable. 3. Absolutely, important comprehensive Grizzly Bear Habitats on federal, state and local lands in all the appropriate NW States must be established and well coordinated first, before any delisting proposal should be considered. Seriously, grizzly bear habitats and their continued management, preservation and conservation for grizzly bears in the states of ID, MT, and WY on federally managed public lands and national forests have NOT been well coordinated, adequate, legally binding, or secured before this delisting proposal was made. Therefore, this proposal should be stopped immediately. 4. The Endangered Species Act requires tribal nations consultation and cooperation which the USFWS has NOT properly handled, managed, or considered. 5. To establish the GYE grizzly bear population as a distinct population segment is definitely and absolutely the most scientifically, ecologically, and socially irresponsible way to continue conservation and protection of a healthy functioning viable grizzly bear population in the GYE or any of the other grizzly recovery areas either. Comprehensively protecting, conserving, reconstructing reestablishing, and reconnecting the GYE grizzly bear population and the grizzly bear habitat and plans, removing the Greater Yellowstone ecosystem and a	FWS-R6-ES-2016-0042-5460
The Service is rushing to delist the grizzly bear before it knows how the Northern Rockies states and other federal agencies plan to manage it. It is unacceptable to proceed with delisting when the state and federal plans governing how this population will be managed are incomplete and therefore, unenforceable.			Factor D As a wildlife biologist, I have worked with several USFWS Threatened and Endangered Species over the past 30 years, with several federal land management agencies. I absolutely disagree with the USFWS's totally premature and significantly and inadequately designed and planned proposal to delist the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. The historic comeback of the Yellowstone grizzly bear population is truly a remarkable achievement. But the current proposal threatens progress made to date. The Service is rushing to delist the grizzly bear before it knows how the Northern Rockies states and other federal agencies plan to manage it. It is unacceptable to proceed with delisting when the state and federal plans governing how this population will be managed are incomplete and therefore, unenforceable. Further, the Service's current proposal doesn't provide grizzlies with enough protections to ensure their long-term recovery. We can't afford to be careless with this species. There is no need to rush this process, but that's exactly what the Service appears to be doing. I call on the Service to put the proposed delisting rule on hold for the following reasons: 1) The Service needs to strengthen habitat protections and mortality limits in the proposed rule. 2) State and federal management plans detailing how this population will be managed are incomplete and must be updated to provide enforceable protections. 3) The Service must rectify inconsistencies that currently exist in the set of documents (the proposed rule, the recovery plan, and the conservation strategy) detailing how this population will be managed post-delisting. The Service continues to work with the state and federal agencies involved, it must prioritize the following: -Strong protections for the core population and habitat. -Restored connectivity with other grizzly bear populations by protecting bears in areas important to connectivity, allowing the population to continue to expand and securing habitat on public lands in between populations. -Continued and enhanced efforts to minimize conflicts between grizzly bears and people, thereby improving social tolerance and public acceptance for the bears throughout their range. -Adequate funding to support ongoing grizzly bear recovery. Idaho, Montana and Wyoming's state grizzly bear management plans must be revised to provide "adequate regulatory mechanisms" to conserve the species - a requirement of the Endangered Species Act. Wyoming has yet to finalize a revised grizzly bear state management plan, and the draft is not in line with important details of the Service's delisting proposal. Idaho and Montana have not yet set a public timeline for revising or allowing public review of revisions to their grizzly bear management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the "adequate regulatory mechanisms" they need. In addition, the Forest Service should allow for public review of any changes to the 2006 forest plan amendments. Currently the timeline for any such process is not public knowledge. Given that the Forest Service manages over 65 percent of suitable habitat in the ecosystem; this is a critical missing piece of the puzzle. Throughout the Northern Rockies, Defenders works closely with management agencies, other conservation groups and local residents to minimize conflict between bears and people. Since 1998, Defenders has invested over a million dollars on close to 300 on-the-ground projects including installing electric fencing around numerous bear attractants, purchasing bear resistant garbage containers for residents, and placing bear resistant food lockers in campgrounds. All of these measures reduce the likelihood of lethal bear/human conflicts and increase human tolerance for the presence of bears on the landscape. Defenders will also continue to work to ensure that adequate protections remain on our public lands for grizzly bears both within recovery	FWS-R6-ES-2016-0042-5524

State and federal management plans detailing how this population will be managed are incomplete and must be updated to provide enforceable protections.			Factor D	Docket No. FWS-R6-ES-2016-0042 "RE" Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. The historic comeback of the Yellowstone grizzly bear population is truly a remarkable achievement. But the current proposal threatens progress made to date. The Service is rushing to delist the grizzly bear before it knows how the Northern Rockies states and other federal agencies plan to manage it. It is unacceptable to proceed with delisting when the state and federal plans governing how this population will be managed are incomplete and therefore, unenforceable. Further, the Service's current proposal doesn't provide grizzlies with enough protections to ensure their long-term recovery. We can't afford to be careless with this species. There is no need to rush this process, but that's exactly what the Service appears to be doing. I call on the Service to put the proposed delisting rule on hold for the following reasons: 1) The Service needs to strengthen habitat protections and mortality limits in the proposed rule. 2) State and federal management plans detailing how this population will be managed are incomplete and must be updated to provide enforceable protections. 3) The Service must rectify inconsistencies that currently exist in the set of documents (the proposed rule, the recovery plan, and the conservation strategy) detailing how this population will be managed post-delisting. The Service continues to work with the state and federal agencies involved, it must prioritize the following: -Strong protections for the core population and habitat. -Restored connectivity with other grizzly bear populations by protecting bears in areas important to connectivity, allowing the population to continue to expand and securing habitat on public lands in between populations. -Continued and enhanced efforts to minimize conflicts between grizzly bears and people, thereby improving social tolerance and public acceptance for the bears throughout their range. - Adequate funding to support ongoing grizzly bear recovery. Idaho, Montana and Wyoming's state grizzly bear management plans must be revised to provide "adequate regulatory mechanisms" to conserve the species - a requirement of the Endangered Species Act. Wyoming has yet to finalize a revised grizzly bear state management plan, and the draft is not in line with important details of the Service's delisting proposal. Idaho and Montana have not yet set a public timeline for revising or allowing public review of revisions to their grizzly bear management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the "adequate regulatory mechanisms" they need. In addition, the Forest Service should allow for public review of any changes to the 2006 forest plan amendments. Currently the timeline for any such process is not public knowledge. Given that the Forest Service manages over 65 percent of suitable habitat in the ecosystem; this is a critical missing piece of the puzzle. Throughout the Northern Rockies, Defenders works closely with management agencies, other conservation groups and local residents to minimize conflict between bears and people. Since 1998, Defenders has invested over a million dollars on close to 300 on-the-ground projects including installing electric fencing around numerous bear attractants, purchasing bear resistant garbage containers for residents, and placing bear resistant food lockers in campgrounds. All of these measures reduce the likelihood of lethal bear/human conflicts and increase human tolerance for the presence of bears on the landscape. Defenders will also continue to work to ensure that adequate protections remain on our public lands for grizzly bears both within recovery	FWS-R6-ES-2016-0042-5524
GOAL Tribal Coalition, its associates and members, oppose the proposed delisting of the grizzly bear in the Greater Yellowstone Ecosystem (GYE). Some fifty federally recognized Indian tribes, plus the Assembly of First Nations, have previously furnished the US Fish and Wildlife Service (FWS) with official resolutions and declarations articulating their opposition to the delisting and inevitable state-operated trophy hunting of the grizzly bear, and many are viewable at www.goaltribal.org .			Factor D	GOAL Tribal Coalition, its associates and members, oppose the proposed delisting of the grizzly bear in the Greater Yellowstone Ecosystem (GYE). Some fifty federally recognized Indian tribes, plus the Assembly of First Nations, have previously furnished the US Fish and Wildlife Service (FWS) with official resolutions and declarations articulating their opposition to the delisting and inevitable state-operated trophy hunting of the grizzly bear, and many are viewable at www.goaltribal.org. GOAL's legal counsel has reviewed FWS's proposed Rule and Conservation Strategy (CS) and declared it to be among the most poorly conceived and written Interior documents they have analyzed. We agree with that assessment. Our submission, therefore, is comprised of two parts: Part One, Critiques of the Rule, section by section, followed by Part Two, In Summary. Dr. David Mattson has acted as an advisor both to GOAL and individual Tribal Nations, and we concur wholeheartedly with Dr. Mattson's findings presented in Part One. Quite possibly, the only statement of credible veracity made in relation to this Rule was that made by Director Ashe to Assistant Director Gary D. Frazier on March 19, 2012 in response to former FWS Grizzly Bear Recovery Coordinator Chris Servheen's recommendations on how to proceed with delisting the grizzly in the GYE, that ultimately resulted in this Rule: "I may be missing something, but this recommendation seems at odds with the 'best available' science standard of ESA." Clearly, this Rule is not reflective of the "best available science," but is validation of the October 2015 survey conducted by the Union of Concerned Scientists, Progress and Problems: Government Scientists Report of Scientific Integrity at Four Agencies, that found 73% of FWS scientists cited "political interests" influenced such decisions. Echoing Chris Servheen's much publicized quote to the press that the grizzly had to be delisted to signal that a "touchdown had been made" for the ESA, one FWS respondent said, "It is my perception that upper-level managers are influenced by fear of Congress dismantling the Endangered Species Act and/or otherwise interfering with the mission of the Service." The construction of this Rule and the, at times, contradictory CS that FWS has no authority to compel participating states and agencies to fund and implement, should result in Interior's IG launching a scientific integrity review, and installing a Scientific Integrity Review Panel to investigate what motivated FWS to present this Rule, for it is absolutely not the "best available science." GOAL Tribal Coalition contends that numerous scientific integrity violations would be exposed, as they were in 2013 in the Porter and Bell scandal over ESA malfeasance and the Keystone-XL pipeline. See attached file(s) Attachments USFWS Grizzly Delisting Rule, Public Comment	FWS-R6-ES-2016-0042-5537

It is stated that bear numbers have increased in the core recovery area, but the underlying assumptions to these statements may be inherently flawed rendering these numbers inaccurate. If the assumptions in the PRD and supporting reports do not hold true in the future, grizzly populations may be adversely impacted. The prudent approach now is to maintain their current listing status. Therefore, I oppose delisting of GYE grizzly bears under management conditions as described in the current FWS PRD and Conservation Strategy.			Factor D	Cynthia Guerra, May 2016 Comments regarding FWS Docket ID: FWS-R6-ES-2016-0042: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. It has been suggested that current management actions have led to an increase in numbers of grizzly bears in the Greater Yellowstone Ecosystem (GYE). But the published Proposed Rule Document (PRD) and supporting reports state that grizzly bears remain "a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality." Therefore, continuation of current management practices is required to help assure a healthy population of the species in the future. It is stated that bear numbers have increased in the core recovery area, but the underlying assumptions to these statements may be inherently flawed rendering these numbers inaccurate. If the assumptions in the PRD and supporting reports do not hold true in the future, grizzly populations may be adversely impacted. The prudent approach now is to maintain their current listing status. Therefore, I oppose delisting of GYE grizzly bears under management conditions as described in the current FWS PRD and Conservation Strategy. Uncertainties about bear demographics and increasing human activity (including hunting) require a more conservative approach than outlined in the PRD. Established recovery strategies and criteria should be retained or even strengthened, with continuing effort to reduce human activity that either damages habitat or invites the greatest risk of human-bear conflict which leads to bear mortality. The PRD does not demonstrate adequately that the scientific modeling or the underlying assumptions to population statistics are robust and will result in appropriate management measures to ensure the success of the GYE grizzly population. I am distressed that FWS expresses confidence in predicting how many "extra" female and male bears that each year will be available for trophy hunting. Some of these annual predictions are very low numbers (less than 5). It is unfathomable that a natural resource agency would ever declare any number of bears less than 5 as "extra" and appropriate for trophy hunting. Given the uncertainty, there should be no "discretionary" bear mortality within the PCA. Current efforts to recover the population of the GYE bears need to continue. Maintenance or even growth of that population should be the primary goal. Grizzly bear populations are an important part of our nation's shared natural heritage. I urge you to reject delisting.	FWS-R6-ES-2016-0042-5529
The Service continues to work with the state and federal agencies involved, it must prioritize the following:-Adequate funding to support ongoing grizzly bear recovery. Idaho, Montana and Wyoming's state grizzly bear management plans must be revised to provide "adequate regulatory mechanisms" to conserve the species - a requirement of the Endangered Species Act. Wyoming has yet to finalize a revised grizzly bear state management plan, and the draft is not in line with important details of the Service's delisting proposal. Idaho and Montana have not yet set a public timeline for revising or allowing public review of revisions to their grizzly bear management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the "adequate regulatory mechanisms" they need. In addition, the Forest Service should allow for public review of any changes to the 2006 forest plan amendments. Currently the timeline for any such process is not public knowledge. Given that the Forest Service manages over 65 percent of suitable habitat in the ecosystem; this is a critical missing piece of the puzzle. Throughout the Northern Rockies, Defenders works closely with management agencies, other conservation groups and local residents to minimize conflict between bears and people. Since 1998, Defenders has invested over a million dollars on close to 300 on-the-ground projects including installing electric fencing around numerous bear attractants, purchasing bear resistant garbage containers for residents, and placing bear resistant food lockers in campgrounds. All of these measures reduce the likelihood of lethal bear/human conflicts and increase human tolerance for the presence of bears on the landscape. Defenders will also continue to work to ensure that adequate protections remain on our public lands for grizzly bears both within recovery areas and in important areas between bear populations. The long term health and resiliency of the Yellowstone grizzly population will require its connectivity with other populations.			Factor D	Docket No. FWS-R6-ES-2016-0042 RE: Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. The historic comeback of the Yellowstone grizzly bear population is truly a remarkable achievement. But the current proposal threatens progress made to date. The Service is rushing to delist the grizzly bear before it knows how the Northern Rockies states and other federal agencies plan to manage it. It is unacceptable to proceed with delisting when the state and federal plans governing how this population will be managed are incomplete and therefore, unenforceable. Further, the Service's current proposal doesn't provide grizzlies with enough protections to ensure their long-term recovery. We can't afford to be careless with this species. There is no need to rush this process, but that's exactly what the Service appears to be doing. I call on the Service to put the proposed delisting rule on hold for the following reasons: 1) The Service needs to strengthen habitat protections and mortality limits in the proposed rule. 2) State and federal management plans detailing how this population will be managed are incomplete and must be updated to provide enforceable protections. 3) The Service must rectify inconsistencies that currently exist in the set of documents (the proposed rule, the recovery plan, and the conservation strategy) detailing how this population will be managed post-delisting. The Service continues to work with the state and federal agencies involved, it must prioritize the following: -Strong protections for the core population and habitat. -Restored connectivity with other grizzly bear populations by protecting bears in areas important to connectivity, allowing the population to continue to expand and securing habitat on public lands in between populations. -Continued and enhanced efforts to minimize conflicts between grizzly bears and people, thereby improving social tolerance and public acceptance for the bears throughout their range. -Adequate funding to support ongoing grizzly bear recovery. Idaho, Montana and Wyoming's state grizzly bear management plans must be revised to provide "adequate regulatory mechanisms" to conserve the species - a requirement of the Endangered Species Act. Wyoming has yet to finalize a revised grizzly bear state management plan, and the draft is not in line with important details of the Service's delisting proposal. Idaho and Montana have not yet set a public timeline for revising or allowing public review of revisions to their grizzly bear management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the "adequate regulatory mechanisms" they need. In addition, the Forest Service should allow for public review of any changes to the 2006 forest plan amendments. Currently the timeline for any such process is not public knowledge. Given that the Forest Service manages over 65 percent of suitable habitat in the ecosystem; this is a critical missing piece of the puzzle. Throughout the Northern Rockies, Defenders works closely with management agencies, other conservation groups and local residents to minimize conflict between bears and people. Since 1998, Defenders has invested over a million dollars on close to 300 on-the-ground projects including installing electric fencing around numerous bear attractants, purchasing bear resistant garbage containers for residents, and placing bear resistant food lockers in campgrounds. All of these measures reduce the likelihood of lethal bear/human conflicts and increase human tolerance for the presence of bears on the landscape. Defenders will also continue to work to ensure that adequate protections remain on our public lands for grizzly bears both within recovery	FWS-R6-ES-2016-0042-5524

GOAL Tribal Coalition, its associates and members, oppose the proposed delisting of the grizzly bear in the Greater Yellowstone Ecosystem (GYE). Some fifty federally recognized Indian tribes, plus the Assembly of First Nations, have previously furnished the US Fish and Wildlife Service (FWS) with official resolutions and declarations articulating their opposition to the delisting and inevitable state-operated trophy hunting of the grizzly bear, and many are viewable at www.goaltribal.org. GOAL's legal counsel has reviewed FWS's proposed Rule and Conservation Strategy (CS) and declared it to be among the most poorly conceived and written Interior documents they have analyzed. We agree with that assessment. Our submission, therefore, is comprised of two parts: Part One, Critiques of the Rule, section by section, followed by Part Two, In Summary. Dr. David Mattson has acted as an advisor both to GOAL and individual Tribal Nations, and we concur wholeheartedly with Dr. Mattson's findings presented in Part One. Quite possibly, the only statement of credible veracity made in relation to this Rule was that made by Director Ashe to Assistant Director Gary D. Frazier on March 19, 2012 in response to former FWS Grizzly Bear Recovery Coordinator Chris Servheen's recommendations on how to proceed with delisting the grizzly in the GYE, that ultimately resulted in this Rule: "I may be missing something, but this recommendation seems at odds with the 'best available' science standard of ESA." Clearly, this Rule is not reflective of the "best available science," but is validation of the October 2015 survey conducted by the Union of Concerned Scientists, Progress and Problems: Government Scientists Report of Scientific Integrity at Four Agencies, that found 73% of FWS scientists cited "political interests" influenced such decisions. Echoing Chris Servheen's much publicized quote to the press that the grizzly had to be delisted to signal that a "touchdown had been made" for the ESA, one FWS respondent said, "It is my perception that upper-level managers are influenced by fear of Congress dismantling the Endangered Species Act and/or otherwise interfering with the mission of the Service." The construction of this Rule and the, at times, contradictory CS that FWS has no authority to compel participating states and agencies to fund and implement, should result in Interior's IG launching a scientific integrity review, and installing a Scientific Integrity Review Panel to investigate what motivated FWS to present this Rule, for it is absolutely not the "best available science." GOAL Tribal Coalition contends that numerous scientific integrity violations would be exposed, as they were in 2013 in the Porter and Bell scandal over ESA malfeasance and the Keystone-XL pipeline. See attached file(s) Attachments USFWS Grizzly Delisting Rule, Public Comment			Factor D	GOAL Tribal Coalition, its associates and members, oppose the proposed delisting of the grizzly bear in the Greater Yellowstone Ecosystem (GYE). Some fifty federally recognized Indian tribes, plus the Assembly of First Nations, have previously furnished the US Fish and Wildlife Service (FWS) with official resolutions and declarations articulating their opposition to the delisting and inevitable state-operated trophy hunting of the grizzly bear, and many are viewable at www.goaltribal.org. GOAL's legal counsel has reviewed FWS's proposed Rule and Conservation Strategy (CS) and declared it to be among the most poorly conceived and written Interior documents they have analyzed. We agree with that assessment. Our submission, therefore, is comprised of two parts: Part One, Critiques of the Rule, section by section, followed by Part Two, In Summary. 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See attached file(s) Attachments USFWS Grizzly Delisting Rule, Public Comment	FWS-R6-ES-2016-0042-5537	did not have the attachment
The Yellowstone grizzly population has benefited from, and will continue to benefit from ESA protection. The current population would not be nearly as numerous or as widely distributed without it. The ESA has protected habitat on public lands by requiring land managers consult with the USFWS to insure their actions do not harm grizzly bears or their habitat, and it needs to stay that way! The ESA listing also stopped sport hunting of grizzly bears, closed garbage dumps and cleaned other human attractants, reduced the numbers of domestic sheep grazing in grizzly bear habitat, prohibited and penalized the harassment and poaching of grizzlies, resulted in increased research that has led to improved management, and provided essential funding for measures to reduce conflicts between bears and people. If delisting were to occur, the bears would lose: Land managers would poorly manage to grizzlies, unnecessary sport hunting would be renewed, the mandate to eliminate human attractants would lessen, there would be little imperative to remove hazards associated with sheep grazing, penalties for harassment and poaching would be greatly lessened, and funding to reduce conflicts and hazards would be harder to secure. Please continue to protect the Yellowstone Grizzly bears under the ESA.			Factor D	I submit comments as a biologist and wildlife conservationist. Given the severity of threats facing Yellowstone's grizzly bears, I strongly urge you to NOT delist the population, renew sport hunting, and/or lessen habitat protections. The reasons to not delist follow. - Yellowstone's grizzly bear population is NOT recovered: It is completely isolated from other grizzly bear populations and very far from the 2000+ animals considered necessary for long-term viability; it's also only 2% of the 100,000 grizzly bears that once roamed the U.S. (in a range 100 times larger!). This magnificent animal's imperilment comes from too many people collectively causing permanent habitat degradation and fragmentation (such as increasing human infrastructure, energy development, problematic livestock husbandry practices, climate change, poor state management, persecution, and questionable methods of monitoring the grizzly's status). - Yellowstone's grizzly bears have lost critically important forage that previously had positive effects on their reproductive success. Since the early 2000s much of their food resources are depleted due to recently introduced non-native lake trout, a white pine fungal disease, a climate-driven outbreak of bark beetles, and a loss of army cutworm moth that are severely threatened by warming. There is no doubt that food resources of Yellowstone's grizzly bears have declined and put the population at grave risk, and more is on its way. - Grizzly bears have one of the lowest reproductive rates of any land mammal, and most cubs die before adulthood. The species also has difficulty colonizing new habitats, mainly because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates and can more easily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover! - State wildlife management agencies bend over backwards for "sport" hunters interested in killing wildlife, who view carnivores as competitors. Hunting accounts for 70-80% of all deaths of adult carnivores in the West. The public trust doctrine is often invoked by state wildlife agencies, but much abused in actual practice in a system that marginalizes and excludes stakeholders who value large carnivores intrinsically or for contributions to ecosystem health. Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals. - Counting grizzlies in Yellowstone's wilderness is difficult, and the indirect indicators used by USFWS are unreliable and generate false results that increase the likelihood that the USFWS will inaccurately conclude that the population has grown, when, in truth, it has declined due to excessive numbers of deaths. Claims by the USFWS that the Yellowstone grizzly has grown at a high rate for several decades are NOT proven. Although some growth may have occurred, it is likely modest, and population decline is probably occurring NOW as a result of deteriorating habitat conditions. New methods being introduced by the USFWS are billed as an improvement, but will actually increase the risk of over-killing bears and mistakenly conclude that observed levels of death are "sustainable". A bad situation will almost certainly worsen if Yellowstone's grizzlies are delisted and resources are not available to maintain current levels of monitoring. - The Yellowstone grizzly population has benefited from, and will continue to benefit from ESA protection. The current population would not be nearly as numerous or as widely distributed without it. The ESA has protected habitat on public lands by requiring land managers	FWS-R6-ES-2016-0042-5647	
State management of grizzlies could lead to disastrous consequences for the population. Removing federal protections for grizzlies means that the states of Wyoming, Montana, and Idaho will have management authority. The state of Wyoming, which holds the vast majority of the ecosystem's grizzlies, has proven itself incapable of managing large carnivores in any scientific manner. The same state that has had its vicious wolf management plan struck down in federal court not once, but twice. The same state that recently saw its legislature propose legalizing the barbaric practice of mountain lion trapping. That state now wants to take a shot at the grizzly. The three states allowed grizzly bear hunting right up until the time that grizzlies were listed in 1975, when the population was in a state of disaster. Additionally, the Wyoming plan effectively draws a line in the map, saying "no grizzlies past here." Excluding the bear from large swaths of suitable habitat in the ecosystem like the Wyoming range and the southern Wind River range. It's worth noting that the bears' favorite food source, the whitebark pine, is actually faring much better in those colder ranges in the ecosystem. If Wyoming has management, bears would not be able to access these areas. All three states are also chomping at the bit to offer grizzly bear trophy hunts. Given that Yellowstone's grizzlies are already dying in record numbers, the prospect of adding to that with a grizzly bear trophy hunt is a disturbing and unconscionable idea. This decision by the USFWS could have severe consequences for the Yellowstone grizzly bears' prospects of surviving in the long term. The population is simply facing too many threats and too many unknowns at this point to even consider delisting, especially given what the states are proposing when they gain management authority.			Factor D	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive versus on someone's floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement; I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and reintroduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key food delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	

Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed.			Factor D	The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range This is being considered for the benefit of trophy hunters and is not based on the science above or any consideration for the safety of the grizzly population. I implore you to consider not hunting them because of the reasons listed above and many more.	FWS-R6-ES-2016-0042-0387
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Trigger Text	Subcode	Subcode			Subcode	Code(s)	Full Comment Text	Form Letter/Document ID	Annotation Notes
The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans.	1002	1003				Factor E	Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities. Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 -- and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears. - - The plan presents a potentially tremendous setback. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - - Yellowstone's bears have also long been isolated from other bear populations, forcing the government to keep them on permanent life support by proposing to truck in bears to avoid health issues caused by inbreeding. This fact further highlights the need for recovering grizzlies in more places. - - I am asking the Service to maintain protections for Yellowstone grizzly bears. If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed.	1001					Factor E	Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities. Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 -- and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears. - - The plan presents a potentially tremendous setback. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - - Yellowstone's bears have also long been isolated from other bear populations, forcing the government to keep them on permanent life support by proposing to truck in bears to avoid health issues caused by inbreeding. This fact further highlights the need for recovering grizzlies in more places. - - I am asking the Service to maintain protections for Yellowstone grizzly bears. If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	

Despite positive demographic trends since ESA listing of the GYE grizzlies, this population remains severely isolated, which will jeopardize the long-term viability of this population until some connectivity can be established with other populations.	1001						Factor E	I am writing to urge you to maintain federal ESA listing for grizzly bears in the Greater Yellowstone Ecosystem (GYE) -- a high-profile population that we as a nation have invested in since 1975. The FWS estimates a GYE grizzly population of about 700 animals, but this is the census size (N). The science of conservation genetics (in which I have some expertise) tell us that the most important number is not N, but rather the "effective population size" (Ne) - basically the number of individuals that successfully reproduce each generation. Depending on the sex ratio and age structure of sexually mature individuals, the number of breeding adults will be LOWER to FAR LOWER than the census size, and in terms of genetic health and long-term viability of a population, THIS IS WHAT COUNTS. (We have learned this the hard way with the Florida Cougar!). Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. - - Despite positive demographic trends since ESA listing of the GYE grizzlies, this population remains severely isolated, which will jeopardize the long-term viability of this population until some connectivity can be established with other populations. Without some assurance that surrounding states can protect bears that attempt to disperse, should ESA restrictions be lifted, this listing should be maintained. Artificially moving GYE bears to other populations (Northern Rockies) and vice-versa may be necessary in the short term, but this amounts to "ecologically baby-sitting" and is not a long term strategy. Corridors must be developed and then maintained long enough to document successful dispersal and reproduction by bears into and out of the GYE, and then delisting would be justified. I hope you will reconsider the delisting proposal and keep the GYE bears protected until they can become part of a larger meta-population group. - - Sincerely,	CBD	
The bears are under pressure which several of their favorite food sources also being under pressure from climate change. In addition, some trees are dying from beetles that are expanding their range also due to climate change. As a result, a two-step food challenge is under way that will impact how much fat the bears can put on prior to hibernation. All these 'drops in a bucket' still threaten to add up to trouble for bears already suffering from habitat loss, human competition, roads, cars and trucks and from intentionally being shot if they wander out of the park in search of food	1006	1002					Factor E	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - The bears are under pressure which several of their favorite food sources also being under pressure from climate change. In addition, some trees are dying from beetles that are expanding their range also due to climate change. As a result, a two-step food challenge is under way that will impact how much fat the bears can put on prior to hibernation. All these 'drops in a bucket' still threaten to add up to trouble for bears already suffering from habitat loss, human competition, roads, cars and trucks and from intentionally being shot if they wander out of the park in search of food. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
I absolutely support federal protection for grizzly bears (in the Greater Yellowstone Ecosystem and elsewhere). Climate crisis is upon us and there are so many pressures on bears and other species. Harvard biologist Dr. E.O. Wilson recently wrote a book ("Half-Earth") stating humankind must fully protect (preserve, set aside, leave alone) half of our planet if we are to preserve critical biodiversity. I recommend it. - - Although Dr. Wilson did not specifically address the Yellowstone ecosystem and the creatures within it, I believe places like Yellowstone should be included in such set-asides - and the bears and other creatures in them protected.	1006						Factor E	I previously commented at length on this proposal through the Greater Yellowstone Coalition but am not sure if those comments were directed to you or other entities. In a nutshell, I absolutely support federal protection for grizzly bears (in the Greater Yellowstone Ecosystem and elsewhere). Climate crisis is upon us and there are so many pressures on bears and other species. Harvard biologist Dr. E.O. Wilson recently wrote a book ("Half-Earth") stating humankind must fully protect (preserve, set aside, leave alone) half of our planet if we are to preserve critical biodiversity. I recommend it. - - Although Dr. Wilson did not specifically address the Yellowstone ecosystem and the creatures within it, I believe places like Yellowstone should be included in such set-asides - and the bears and other creatures in them protected. - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Thank you for your time and consideration. - - Sincerely,	CBD	

All requests impacting our wildlife must now include how global warming will be changing the area	1006						Factor E	I urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem. - - All requests impacting our wildlife must now include how global warming will be changing the area. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
this population also remains severely isolated	1001						Factor E	First, I am Wildlife Biologist, former state (Maine and Everglades) and federal. The following is written by Center for Biological Diversity. I have read it and agree wholeheartedly. I will go further by saying that the CBD has become the most effective wildlife conservation entity in America. You are the lead agency responsible for effecting the Endangered Species Act of 1973, and you will be held responsible. - - I know it is not easy and with the Republican interests attacking the ESA more aggressively than ever, it is becoming more difficult. But the right decisions must still be made, regardless of how difficult. - - Following the CBD's words. - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities.	1001	1000					Factor E	Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities. Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 -- and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears. - - The plan presents a potentially tremendous setback. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - - Yellowstone's bears have also long been isolated from other bear populations, forcing the government to keep them on permanent life support by proposing to truck in bears to avoid health issues caused by inbreeding. This fact further highlights the need for recovering grizzlies in more places. - - I am asking the Service to maintain protections for Yellowstone grizzly bears. If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	

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The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters	1002	1003					Factor E	As an environmental educator and field biologist, a parent, and a citizen who cares deeply about conservation and preserving biodiversity, I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. Unfortunately, the response of many state agencies property and ranch owners is to blame the bears and deal with any problems by killing bears instead of looking for more creative solutions, even though such solutions exist and are often effective. And drought and climate change are likely to exacerbate these problems, as well as reduce the population of bears. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. With all the current and potential stresses facing the Yellowstone grizzly bears and surrounding populations of grizzlies, it would be irresponsible to remove these bears from the endangered species list. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
Those of us who live here have seen the white bark pine and other food sources dwindle as climate change changes the ecosystem we all, including the bears, live in	1002	1006					Factor E	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Have you been to yellowstone recently? Have you looked, and I mean actually looked at the food sources for the bears? Those of us who live here have seen the white bark pine and other food sources dwindle as climate change changes the ecosystem we all, including the bears, live in. - - Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. That should be a game changer for you. No? - - Allowing the surrounding states to manage these bears and permit trophy hunting (REALLY? WTFwhat?) will add significant pressure to this population. AS YOU KNOW, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	

I am a beneficiary of the Wildlife Public Trust. You are trustees that owe future generation an undiminished trust account, and current beneficiaries an equitable share of any profits. Delisting will put you in violation of your fiduciary duties, while you pass to less than 6% of the beneficiaries total access to consume well in excess of their share. Times are changing, and you will be called to justice for your failures as trustees. Many of us are exhausted by the chicanery of the Department of Interior as it kowtows to special interests. Any independent biologist would state that Ursus arctos horribilis is not recovered and that its population is not robust or genetically diverse enough to withstand the hunting pressures that you know will follow delisting, all of this indicating that the species needs continued protection. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list.							Factor E	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. - - I am a beneficiary of the Wildlife Public Trust. You are trustees that owe future generation an undiminished trust account, and current beneficiaries an equitable share of any profits. Delisting will put you in violation of your fiduciary duties, while you pass to less than 6% of the beneficiaries total access to consume well in excess of their share. Times are changing, and you will be called to justice for your failures as trustees. Many of us are exhausted by the chicanery of the Department of Interior as it kowtows to special interests. Any independent biologist would state that Ursus arctos horribilis is not recovered and that its population is not robust or genetically diverse enough to withstand the hunting pressures that you know will follow delisting, all of this indicating that the species needs continued protection. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
The Grizzly Bear absolutely does not have a secure future. Every biologist familiar with this species understands it is deeply imperiled both by global warming and by the creeping development around the Greater Yellowstone Ecosystem. The FWS must maintain ESA protections for the Grizzly until humans stabilize the Earth's climate, and secure permanent protection of enough land in the Intermountain West for it to survive, free from the expropriation and dispossession of developers	1006						Factor E	***The Grizzly Bear absolutely does not have a secure future. Every biologist familiar with this species understands it is deeply imperiled both by global warming and by the creeping development around the Greater Yellowstone Ecosystem. The FWS must maintain ESA protections for the Grizzly until humans stabilize the Earth's climate, and secure permanent protection of enough land in the Intermountain West for it to survive, free from the expropriation and dispossession of developers.*** - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
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removing protections for Yellowstone grizzlies is premature. These bears must be allowed to roam and reconnect with other populations without being hunted and shot. - This plan presents a potentially tremendous setback for the grizzlies. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems	1002	1003			1006	Factor E	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - removing protections for Yellowstone grizzlies is premature. These bears must be allowed to roam and reconnect with other populations without being hunted and shot. - This plan presents a potentially tremendous setback for the grizzlies. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - Sincerely,	CBD	
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Now with declining food sources and climate change it is still premature.	1000	1006					Factor E	- Hello, - - A proposal delist grizzly bears has long concerned me. Years ago when this talk started it was premature. Now with declining food sources and climate change it is still premature. Millions of acres of habitat is unoccupied. Look on Cali	CBD	
Grizzlies and other species need paths created which will connect all grizzlyls (and others) with every grizzly habitat in the western U.S. and Canada to prevent inbreeding and deaths caused when trying to cross highways and other man-made obstacles	1001						Factor E	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€œthey should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Grizzlies and other species need paths created which will connect all grizzlyls (and others) with every grizzly habitat in the western U.S. and Canada to prevent inbreeding and deaths caused when trying to cross highways and other man-made obstacles. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in Westâ€œthey are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely, Michael Tinsley	Endangered Species Coalition	
I am sure you aware that grizzlies are threatened by climate change, development, habitat fragmentation, road and train kills and by hunting.	1006						Factor E	Dear Director Ashe, I am strongly opposed to any attempt to remove the Grizzly Bear from Endangered Species Act protections. I am sure you aware that grizzlies are threatened by climate change, development, habitat fragmentation, road and train kills and by hunting. Their low reproductive rate makes every bear special. The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€œthey should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in Westâ€œthey are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	

It is better to wait than to jump into this, since we do not know how climate change will affect them, with wildfire destroying habitat, new diseases, heat stresses on water and impacts yet to be seen and understood.	1006						Factor E	Please accept my comments on the proposed delisting rule. Please do not delist grizzly bears. There certainly should not be hunting allowed, as there are already many deaths per year. It is better to wait than to jump into this, since we do not know how climate change will affect them, with wildfire destroying habitat, new diseases, heat stresses on water and impacts yet to be seen and understood. Improving corridors to connect populations, and other habitat protection measures need to be funded and in place. Thanks,	GYC	
BEARS MUST BE ALLOWED TO ROAM LARGE AREAS AND MIX WITH DIFFERENT POPULATIONS FOR GENETIC DIVERSITY. LET THEM LIVE .	1001						Factor E	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. GRIZZLY BEARS ARE AN INTEGRAL PART IN ECOSYSTEMS. THEY ARE INTELLIGENT ANIMALS, WHO, WHEN GIVEN THE CHANCE, PREFER TO BE BE AWAY FROM HUMANS. WE MUST LEARN TO LIVE NEXT TO THEM, AND NOT HUNT THEM AT ALL. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. BEARS MUST BE ALLOWED TO ROAM LARGE AREAS AND MIX WITH DIFFERENT POPULATIONS FOR GENETIC DIVERSITY. LET THEM LIVE. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	
Hunting them is taking unfair advantage and needlessly killing creatures that we can live in harmony with. When a bear becomes a danger to people or animals, then it can be removed from the population. Include a campaign to change people's attitudes first.	1007						Factor E	Please accept my comments on the proposed delisting rule. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. The country's grizzly bears are almost all habituated to humans, with most willing to co-exist and not harm us. They normally do not see people as food or as harmful. Hunting them is taking unfair advantage and needlessly killing creatures that we can live in harmony with. When a bear becomes a danger to people or animals, then it can be removed from the population. Include a campaign to change people's attitudes first. Protect core habitat. There needs to be a corridor from Yellowstone to the Yukon (the Y to Y project). Please support that so that the grizzly population can become self sustaining, with or without people, with or without special protections, as part of a natural ecosystem. They need to be able to travel to find food and other non-related bears. - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. -Maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. Maintaining a stable population will depend on the grizzly's food supply in a human-free habitat, which is in great fluctuation now. Commit to reducing conflicts. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. A campaign and bear-proof garbage containers to start. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other agencies involved. Many volunteers and local groups are ready, willing, and able to help. Please change the proposed plan for the better. Show that we have learned how to manage wildlife better over these past years when we didn't do so well. Take the words 'extermination', 'killing', 'removing', and 'reducing the population' out of your dictionary. It's our country too and many of us love to see grizzly bears.	GYC	

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I support the Yellowstone to Yukon corridors for reuniting and allowing the genetic mixing of various grizzly populations .	1001					Factor E	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal one governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. I support the Yellowstone to Yukon corridors for reuniting and allowing the genetic mixing of various grizzly populations. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	
The Yellowstone ecosystem is undergoing dramatic changes due to climate change and bears need all the help they can get. As an example white pines, an important source of food for the Bears are facing beetle problems, for the first time in Millinnia.	1006	1002				Factor E	Please accept my comments on the proposed delisting rule. It is absolutely unacceptable to me to delist grizzly bears at this time. The Yellowstone ecosystem is undergoing dramatic changes due to climate change and bears need all the help they can get. As an example white pines, an important source of food for the Bears are facing beetle problems, for the first time in Millinnia. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	
I have just finished reading the current issue of Yellowstone Science which dealt almost entirely with Grizzly Bears. While it seems to be true that Grizzlies are starting to reach the carrying capacity for the GYE, their future is not secure. The loss of Whitebark Pine, coupled with climate change, and pesticide use in neighboring states that can contribute to the loss of the Army Cutworm Moth may severely impact some portion of the Grizzly population.	1002	1006			1004	Factor E	I am writing to ask that you do not delist Yellowstone grizzly bears. Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered. Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. I have just finished reading the current issue of Yellowstone Science which dealt almost entirely with Grizzly Bears. While it seems to be true that Grizzlies are starting to reach the carrying capacity for the GYE, their future is not secure. The loss of Whitebark Pine, coupled with climate change, and pesticide use in neighboring states that can contribute to the loss of the Army Cutworm Moth may severely impact some portion of the Grizzly population. Regardless the economic impact of tourists to the region who come to view Grizzlies is greater than that brought by hunting.	Humane Society	

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Killing the adults destroys future generations by turning cubs into abandoned orphans						Factor E	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. Killing the adults destroys future generations by turning cubs into abandoned orphans. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	
The grizzly still faces many threats, including the loss of their food supply from the massive die back of pine tress from the pine bark beetle and resultant fungal infestation.	1002					Factor E	The listing if grizzly bears as endangered was a landmark in the process of preventing extinction of the grizzled bear in the US. The grizzly still faces many threats, including the loss of their food supply from the massive die back of pine tress from the pine bark beetle and resultant fungal infestation. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	

he delisting of grizzly bears is premature and without an adequate environmental study of how climate change will effect their numbers.	1006					Factor E	The delisting of grizzly bears is premature and without an adequate environmental study of how climate change will effect their numbers. We know they rely on the white pine which is prone to drought. It is far to early to put the american equivalent of the african elephant onto the delisted program. We could wreck havoc with what has been their steady recovery just so some yahoos can have their trophy hang in a living room. Be sensible, and manage with the thought of the future in mind, and how very precarious it might be for these majestic creatures. thank you, Nicole Terry	Humane Society Petition	
Yes, grizzly numbers in the Greater Yellowstone Ecosystem have grown from a low near 150 before listing, to over 700. Seven Hundred.....not a large number by any means. Couple that with the facts that they are very slow to reproduce, have at best a 50% chance of making it to breeding age and their primary food sources are being devastated by climate change make this rebound in numbers tenuous at best.	1000	1006				Factor E	Many have stated on social media and in articles concerning the subject that appealing to your office and the state governments of Idaho, Montana and Wyoming is a waste of time. As far as I am concerned, you are still part of the US Government and, as such, for the people. Therefore, I am confident that you will treat the concerns of all constituents with thoughtful consideration in this and all matters related to your work. Yes, grizzly numbers in the Greater Yellowstone Ecosystem have grown from a low near 150 before listing, to over 700. Seven Hundred.....not a large number by any means. Couple that with the facts that they are very slow to reproduce, have at best a 50% chance of making it to breeding age and their primary food sources are being devastated by climate change make this rebound in numbers tenuous at best. At this time, there is no economic or safety value to delisting. "Problem" bears are still handled on a case by case basis and economically, their value as a draw to the National Parks (Yellowstone and Teton) where they reside is estimated to be greater than \$10,000,000 per year. Any income gained by delisting and issuing hunting permits would be short lived and modest to nonexistent in comparison. The argument that trophy hunting will be economically important to saving the grizzly is arcane and outdated. One should also factor in the sentiments not only of our nation, but that of people from around the globe, many whom travel to the US annually for the chance of glimpsing one of these iconic bears. How can we ask other nations to conserve and protect their wildlife when we stop protecting ours? And, yes, they are a keystone species. Their recovery, along with that of the two other major predators in Greater Yellowstone, the wolf and the mountain lion, have been shown to have improved the health of the entire ecosystem. I hope that you will consider this argument and that, in the final vote, our federal government will stand behind continuing to protect this iconic species.	Humane Society Petition	
Yet these roaming bears, which may disperse hundreds of miles to mate, are precisely the animals that are needed to convey genetic diversity among populations. If dispersing bears are shot without restraint, chances of the species' survival will be sharply lowered.	1001					Factor E	The federal government spent years trying to add bears to the population; only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. Preserving federal protections for grizzly bears is paramount to species' survival BY GARY CARTER SPECIAL TO THE DAILY CALLAST UPDATED APRIL 1, 2016 Comment 3 In 1805, the explorers Meriwether Lewis and William Clark, making their way across the West, were warned by Native American tribes of grizzly bears' awesome strength. At first, Lewis scoffed at the tribes' advice, writing in his journal that "in the hands of skillful riflemen they are by no means as formidable or dangerous as they have been represented." A few terrifying encounters with the bears, though, changed his mind about that. A little more than a century later, crowds at Yellowstone National Park would gather in delight to watch the bears dine on food scraps. Signs were marked "Lunch Counter ... for Bears Only." Those days are long gone, but crowds still flock to Yellowstone -- nearly 4 million visitors every year -- partly to catch a glimpse of the storied creatures. The grizzly bears that live in and around Yellowstone make up almost half the population in the lower 48 states, and now those bears are at risk. In 2015, their numbers in the Yellowstone area declined by 40, to an estimated 717 from 757 -- a 6 percent drop that represents the highest one-year mortality since grizzlies were given federal protection in 1975. Despite this decline, the U.S. Fish and Wildlife Service is currently preparing to strip the animals of their Endangered Species Act protection. The agency is under pressure from the states around Yellowstone -- Wyoming, Montana and Idaho -- to allow hunting of bears that roam outside the park's boundaries. Now, the proposal to call the bears recovered and remove their protection is imminent. If the rule is finalized, it's likely to allow states to reduce bear numbers by more than 100 practically overnight. But the bears are already struggling, threatened by declines in important foods such as white-bark pine and Yellowstone cutthroat trout, as well as by their isolation from other grizzly populations. Historically, grizzlies ranged from Alaska to Mexico, with at least 50,000 bears living in the western half of the contiguous United States. Today only about 1,500 to 1,700 grizzlies survive outside Alaska, in five isolated populations in the northern Rocky Mountains and the Cascades. Numbers in the Greater Yellowstone area have increased since the animals were first given federal protection, but they continue to be threatened by climate change and food shortages. Over all, grizzly bears still occupy only 2 to 4 percent of their ancient range in the lower 48 states. In June 2014, we filed a "recovery plan petition" asking the Fish and Wildlife Service to recover grizzlies in more of their historic range, including parts of Colorado and Utah; in December, we further petitioned to reintroduce bears into the Selway-Bitterroot Wilderness in Idaho. The Endangered Species Act requires that a species be protected in each "significant portion of its range" -- the law's intent being not only to prevent a species' extinction, but also to ensure species so they can persist into the future. But the species has been	Humane Society Petition	

Removing grizzly bears from the listing acts against this interest of self-sustaining ecosystems.						Factor E	As a visitor to Yellowstone, I expect the ecosystems to be supported towards restoration and equilibrium. Removing grizzly bears from the listing acts against this interest of self-sustaining ecosystems. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	
The loss of Whitebark Pine, coupled with climate change, and pesticide use in neighboring states that can contribute to the loss of the Army Cutworm Moth may severely impact some portion of the Grizzly population.	1002	1006			1004	Factor E	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. I have just finished reading the current issue of Yellowstone Science which dealt almost entirely with Grizzly Bears. While it seems to be true that Grizzlies are starting to reach the carrying capacity for the GYE, their future is not secure. The loss of Whitebark Pine, coupled with climate change, and pesticide use in neighboring states that can contribute to the loss of the Army Cutworm Moth may severely impact some portion of the Grizzly population. Regardless the economic impact of tourists to the region who come to view Grizzlies is greater than that brought by hunting.	Humane Society Petition	
We have land, we have built cities and produced amazing things for good, but we need to reconsider the steps we take regarding not just climate control but other species survival. We need to safe guard animal not by throwing them in zoos but allowing them to live their life in their natural environment like we are						Factor E	Please, I urge you to think before acting! The more we encroach on land that "wildlife" have as their home the more we as a human race become nothing more than a virus. We have land, we have built cities and produced amazing things for good, but we need to reconsider the steps we take regarding not just climate control but other species survival. We need to safe guard animal not by throwing them in zoos but allowing them to live their life in their natural environment like we are. This may not get read, no action taken but the more we keep wanting to distroy the natural and stunning wild the more we are building our own demise. Thank you, Daman The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	

These bears will struggle to survive climate change.	1006						Factor E	Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: These bears will struggle to survive climate change. Already massive development in the areas surrounding the parks is threatening their survival, as well as that of other animals that need large spaces and migratory routes. Now is the time for the government to formally purchase and make forever wild vast tracks of the west, before it is lost forever to development. As large ranches close, it is an opportunity for the federal government to preserve and protect the land, rather than letting it fall to subdivisions and second-home owners. * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Thanks again for considering my comments.	NPCA	
With climate change bears face decreased nutrition with the decimation of whole forests by the white bark pine beetle, fungal infestation and lack of the nutritious nuts	1006	1002					Factor E	Predators are an important part of a healthy ecosystem. With climate change bears face decreased nutrition with the decimation of whole forests by the white bark pine beetle, fungal infestation and lack of the nutritious nuts. Prey species that are affected by climate change must be considered. Genetic diversity requires the ability of bears to migrate and reach other populations, currently difficult. Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Thanks again for considering my comments.	NPCA	
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It would be a disservice to park grizzly bears, the efforts of countless individuals, and generations to come to rush the delisting of grizzly bears, especially considering the potential additional threats they will face with climate changes occurring now and likely increasingly in the future.	1006					Factor E	Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule, especially because it would most likely endanger the grizzly bears that call Yellowstone, the Grand Tetons and the John D. Rockefeller parks home. Several decades and millions of dollars have been dedicated to recovering the grizzly bears of Yellowstone, Grand Teton, and surrounding landscapes to ensure the long-term health of these animals. It would be a disservice to park grizzly bears, the efforts of countless individuals, and generations to come to rush the delisting of grizzly bears, especially considering the potential additional threats they will face with climate changes occurring now and likely increasingly in the future. The possibility that the Fish and Wildlife Service's proposal could allow hunting to occur inside Grand Teton and the John D. Rockefeller Parkway, adjacent to national park lands, and in key ecological corridors is totally unacceptable, as the National Parks are the one hope that Americans have to save endangered and threatened species. In order to ensure that the conservation of grizzly bears in the parks and the surrounding Greater Yellowstone Ecosystem remains a success story, I ask that you take the following steps before finalizing any plan to delist them: * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Thanks again for considering my comments.	NPCA	
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Please also address the fact that climate disruption is impacting grizzly bears' habitat, food sources and behavior, and take these changes into account when managing for the HEALTH of grizzly bear populations--not their reduction	1006	1000				Factor E	I am very concerned about your agency's proposal to delist Yellowstone grizzly bears and thank you for the opportunity to provide comments on the proposed rule. It is an unfortunate fact that without the vital safety net provided by the Endangered Species Act (ESA), Yellowstone's grizzly bears are likely to be pushed back to the brink of extinction. Here's why: Yellowstone's current population of roughly 650 to 750 grizzly bears is much smaller than the 2000+ animals widely considered by experts to be necessary for long-term viability. Altogether, the five remaining grizzly bear populations in the lower-48 states number perhaps 1500, a mere 1-2% of the 100,000 grizzly bears that once roamed the contiguous U.S. in a range that was formerly 100 times larger. The federal government plans on deliberately perpetuating this precarious situation, even though it means trucking bears into Yellowstone every ten years to deal with genetic problems, and trusting state wildlife management agencies that have notoriously anti-carnivore track records. Entrusting grizzly bear management to the states leaves the rest of us without a democratic voice in ensuring the survival of these magnificent creatures. Moreover, although grizzly populations could be naturally supplemented by maintaining corridors connecting Yellowstone grizzlies with their cousins in Glacier National Park, this option is being foreclosed. Meanwhile, grizzly habitat is shrinking due to growing numbers of hobby ranches, vacation homes, and hunters in pursuit of a grizzly bear trophy. Although bears are demonized for hunting cattle, sheep, and even game, their pine nut and other dietary staples are also being impacted by human damage to the ecosystems that sustain them. I ask that you NOT delist the grizzlies. Moreover, I also ask that you NOT entrust their management and responsibility for stewardship to the states. Doing so would effectively disenfranchise me from a voice in an important part of my--and my children's--national, natural heritage. I further ask that National Park Service managers be assured a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, I ask for measures to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. Please also address the fact that climate disruption is impacting grizzly bears' habitat, food sources and behavior, and take these changes into account when managing for the HEALTH of grizzly bear populations--not their reduction. Thank you again for your consideration.	NPCA	

Grizzlies have the lowest reproduction rate of any North American mammal. They need to reach other grizzly populations for biological diversity.	1001					Factor E	Grizzlies have the lowest reproduction rate of any North American mammal. They need to reach other grizzly populations for biological diversity. Their food sources are being impacted by global warming. If their numbers get too low they may never recover. If they are delisted, don't hunt them. If they are hunted, there should be a no hunting corridor between and around the parks. Do NOT delist the grizzlies!	WELC	
Their food sources are being impacted by global warming.	1006	1000				Factor E	Grizzlies have the lowest reproduction rate of any North American mammal. They need to reach other grizzly populations for biological diversity. Their food sources are being impacted by global warming. If their numbers get too low they may never recover. If they are delisted, don't hunt them. If they are hunted, there should be a no hunting corridor between and around the parks. Do NOT delist the grizzlies!	WELC	
Grizzlies of the Greater Yellowstone Ecosystem are still in danger. Climate change has affected their food sources and they don't have genetic diversity.	1006	1000				Factor E	Grizzlies of the Greater Yellowstone Ecosystem are still in danger. Climate change has affected their food sources and they don't have genetic diversity. They have a high mortality rate and low reproduction rate. Surrounding States are already planning to sell trophy hunting licenses to kill 100 grizzlies. The science prices all these issues and should be listened to. Logging, mining, and ranching interests support delisting for monetary gain. The ecotourism industry brings millions of dollars a year to the area because visitors want to see grizzlies and wolves. Please listen to science and don't let your legacy be a bear rug. #DontDelistGrizzlies	WELC	

Grizzly bear populations are too small and too genetically limited to be viable without continued protection. If bears are removed from ESA, the three states around Yellowstone will allow hunting and killing of too many bears.	1001					Factor E	Grizzly bear populations are too small and too genetically limited to be viable without continued protection. If bears are removed from ESA, the three states around Yellowstone will allow hunting and killing of too many bears.	WELC	
Additionally, the Yellowstone grizzly population remains isolated; further limiting their range and numbers could prevent them from ever connecting to other grizzly populations.	1001					Factor E	I am writing to urge you to postpone delisting of the Yellowstone grizzly bear population. The proposal to remove Yellowstone grizzly bears from the endangered species list fails to preserve the progress made toward bear recovery. In fact, it will reverse it. The Greater Yellowstone grizzly bear is one of the United States' most iconic species. Held sacred by native communities for thousands of years in the west, the majestic grizzly has become a treasured symbol of our wild heritage. Visitors spend millions of dollars in the region every year, a vital part of many local economies, in the hopes of spotting a magnificent grizzly. The loss of the grizzly would be a loss for the entire region, and a disservice to the wildlife professionals, dedicated conservationists and wildlife advocates who have fought to save them. While grizzlies have made a comeback, their recovery is still a delicate and uncertain effort. Grizzly bears occupy less than 2% of their historic range in the lower 48 and reproduce very slowly, at a rate of only 1-2 cubs every few years. In the Yellowstone region, the growth of the population has stalled since the early 2000s, and there was a 6% decline last year. The proposed rule leaves Greater Yellowstone grizzlies in the crosshairs, as states have made clear their plans to reduce the population, including through trophy hunts. Management of grizzly bears outside of the national parks would be left completely up to the states, which have historically been hostile to bears and other large carnivores. The current proposal would allow states to exceed maximum bear deaths for years before any review, allowing for potentially irreversible damage, and would allow complete eradication of bears in some areas. The loss of female grizzlies to trophy hunters who will not be able to tell the difference between a male and female bear could cause a steep, quick decline before emergency action can be taken. Additionally, the Yellowstone grizzly population remains isolated; further limiting their range and numbers could prevent them from ever connecting to other grizzly populations. People and bears can coexist. We should not let bears slide back towards extinction because of misplaced political hostility towards these magnificent and beloved creatures. The end result of this proposal will be fewer bears limited to less land and with access to fewer resources necessary for survival. For too long, human beings have assumed animals are non-sentient, unintelligent and, therefore, ours to disrespect and exploit as we will. Today, often new research is published that denies humankind's previously arrogant assumptions about other species, and our lack of respect and care must change. Money and politics should not have the weight that they do on what is essentially an ethical question.	WELC	
I do not believe the genetic diversity of existing populations can be preserved without the ESA. I believe that delisting will put the long term viability of this species at grave risk.	1001					Factor E	I believe that grizzly bear populations are still too low to remove them from the ESA. Threats of hunting cannot be understated and illegal killings are likely to increase as well. I do not believe the genetic diversity of existing populations can be preserved without the ESA. I believe that delisting will put the long term viability of this species at grave risk. Considering the rash of proposed ESA delistings in the last few years that have been based on flawed and weak claims not justified by the scientific record, I am extremely skeptical that delisting the grizzly is justified.	WELC	

The right time will come but it is not now - we need much better diversity and distribution.						Factor E	The right time will come but it is not now - we need much better diversity and distribution.	WELC	
Greater Yellowstone Ecosystem Grizzlies remain isolated from the main population, and delisting with its consequent state public hunting will so further diminish the genetic diversity of that population, that the delisting will effectively slowly extinguish the species.	1001					Factor E	Greater Yellowstone Ecosystem Grizzlies remain isolated from the main population, and delisting with its consequent state public hunting will so further diminish the genetic diversity of that population, that the delisting will effectively slowly extinguish the species. The grizzly still only occupies a very tiny percentage of its historical habitat. Until sufficient subpopulation connectivity is established, and grizzly can naturally disperse into the western US , no delisting is appropriate. State control of predators has proven to be excessively draconian, turning the tiny remnant predator populations of predators not ESA listed into persecuted and very like nonviable over the long-term, unless permanent bans on public hunting can be established. The grizzly has such a slow reproductive capacity, that this small and fragmented US population MUST remain protected for the foreseeable future, as the few states holding populations cannot be trusted to use science to understand the consequences of their already publicized intents to create a public market for the killing of these important apex predators and scavengers.	WELC	
Grizzlies need continued protection under the ESA, period. Global warming has all but completely wiped out their prime food source, the whitebark pine. Survival will be dependent on further room to roam for food sources without being killed for so called "trophies ".	1006	1002				Factor E	Grizzlies need continued protection under the ESA, period. Global warming has all but completely wiped out their prime food source, the whitebark pine. Survival will be dependent on further room to roam for food sources without being killed for so called "trophies ".	WELC	

I urge the USFWS to withdraw its premature delisting proposal for the grizzly bear. With the decline of favorite food sources such as white bark pine nuts and cutthroat trout and the yet to be fully understood impact of climate change on this fragile species, the grizzly population in the Greater Yellowstone Ecosystem region should continue to receive federal protection for at least another decade.	1002	1003			1006	Factor E	I urge the USFWS to withdraw its premature delisting proposal for the grizzly bear. With the decline of favorite food sources such as white bark pine nuts and cutthroat trout and the yet to be fully understood impact of climate change on this fragile species, the grizzly population in the Greater Yellowstone Ecosystem region should continue to receive federal protection for at least another decade. The lack of connectivity between the Yellowstone population and other grizzly populations is also important for the long-term viability for the bears. Delisting the grizzly bear would only compound this problem. I believe this delisting proposal would be a real step backward in grizzly recovery. Thank you for considering my comments.	WELC	
As far as concerns about the bears becoming genetically isolated first of all I would point out that a slight reduction of bears (If there even is) within the Yellowstone ecosystem is not going to have any affect. I would think genetic diversity within the Yellowstone ecosystem relies on transient animals from other ecosystems arriving in the Yellowstone ecosystem, keeping in mind that these transient animals will still be fully protected until their arrival I believe the delisting would have almost no affect in this regard. Having lived in close proximity to grizzlies from other ecosystems all my life I find it abundantly evident that they are recovering and dispersing and have no doubts genetic diversity is not in any danger from the proposed rule, if anything perhaps a slight reduction in the Yellowstone population may be beneficial in this regard as it would make room for transient animals to establish territories and eventually interbreed with the existing population.	1001					Factor E	I fully support removing the greater yellowstone ecosystem population or grizzly bears from the list for both practical reasons or coexisting with bears and from a biological standpoint. Without going in to regurgitating data to support my statement I will just say I know that the professional biologists from USFWS would not make such a proposal if there were not sufficient evidence to warrant doing so. I also know that the states involved are fully capable of managing the bears without risk of taking a step backward in terms of maintaining a viable population in the Yellowstone ecosystem or achieving recovery in other ecosystems. As far as concerns about the bears becoming genetically isolated first of all I would point out that a slight reduction of bears (If there even is) within the Yellowstone ecosystem is not going to have any affect. I would think genetic diversity within the Yellowstone ecosystem relies on transient animals from other ecosystems arriving in the Yellowstone ecosystem, keeping in mind that these transient animals will still be fully protected until their arrival I believe the delisting would have almost no affect in this regard. Having lived in close proximity to grizzlies from other ecosystems all my life I find it abundantly evident that they are recovering and dispersing and have no doubts genetic diversity is not in any danger from the proposed rule, if anything perhaps a slight reduction in the Yellowstone population may be beneficial in this regard as it would make room for transient animals to establish territories and eventually interbreed with the existing population. Knowing many people who live and recreate in the Yellowstone ecosystem I am shocked at how many tell me about frequent encounters with these bears. I am convinced the reason that the bears so commonly show little or no fear of humans is that management policies have prohibited people from engaging in activities which discourage bears from interaction with humans, including defense of life and property in all but the most dire of circumstances. Bears are very capable of learning from their experiences and I believe their behavior will change in a positive way resulting in less conflict if the proposed rule is adapted, this will be good for the bears in the long term, if sows teach their young to avoid humans rather than being indifferent to them, or worse yet seeking them out, more cubs will survive. While on the subject of cub survival I would also like to point out that if regulated hunting was established in any portion of the ecosystem it also has the potential of benefiting overall cub survival rates as well by reducing the number of mature boars which are known to kill cubs given the opportunity, in addition to helping restore a healthy fear of humans in all the bears. In reality state regulated hunting would provide funds for conservation efforts and create a better public perception of the bears as well as state and federal management agencies within the communities directly affected. Financially the proposed rule has many benefits both for government agencies as well as citizens. Federal managers would no longer be tasked with providing protection to a population segment that quite frankly has no more room to grow. State managers would no longer be tasked with monitoring a population they are forbidden from managing as a resource. Private citizens could potentially benefit in many ways including less loss of personal property and perhaps even revenue generated by regulated hunting. I believe that	FWS-R6-ES-2016-0042-0075	
The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. A - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. A	1001					Factor E	~~I oppose the delisting of grizzly bears on the following grounds. - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!).~~ With the climate change on fact this is the worst case scenario and food source changes for bears will be very serious	FWS-R6-ES-2016-0042-0320	

Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. A	1001					Factor E	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). <i>With the climate changing so fast, this is the worst winter on record, and food sources changing for bears, why are we rushing</i>	FWS-R6-ES-2016-0042-0320	
Population growth has stagnated since the early 2000s and has even been in decline in recent years. Most recently in fact, the Yellowstone grizzly population declined by 43 bears in 2015 alone, representing a massive 6% population decline in a single year. The USFWS has argued that the population growth has stagnated because the population has reached its carrying capacity. In reality, what's happened is the bears major food sources are in a state of disaster and more bears are roaming more widely in search of different foods and getting killed by humans in the process.	1000					Factor E	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	
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Yellowstone's grizzlies have had zero genetic connectivity with outside populations in the last 100 years. This means that every grizzly in the Yellowstone population today came from a gene pool of only 136 animals (the population low point in 1975). A wildlife population will not survive in the long term without genetic connectivity to promote genetic diversity and avoid the damaging effects that inbreeding can have on a wildlife population. Establishing corridors to allow bears to move between populations in Yellowstone and Glacier will require more protection, not less. Genetic connectivity is an absolute necessity if the Yellowstone grizzly is to survive in the long term and this prospect becomes much more difficult in the absence of ESA protections.	1001						Factor E	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	
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Because the ecosystem is becoming stressed by climate change causing dramatic changes in food supplies needed. Because all foods are not equal.	1006	1000					Factor E	We have lived, worked and recreated in the Greater Yellowstone Ecosystem (GYE) for almost 40 years, meeting working in Yellowstone National Park. We have explored by foot thousands of miles of trails into some of the most breathtaking landscapes on earth, filled with the suite of native wildlife that we so love and respect. We have seen many grizzly bears over the decades and no animal is more powerful in the public's sensibility than the Great Bear. It is our state animal, picked by Montana school children. Our native tribes greatly value the grizzly bear as do all of us who value our wild places and wildlife. The grizzly bear is greater than life; it represents all that we as a people almost lost and what we have preserved. We value our large predators, our carnivores, because they remind us that we share life together in this time and place. They represent the wilderness we almost lost. We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best. Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data. Because the ecosystem is becoming stressed by climate change causing dramatic changes in food supplies needed. Because all foods are not equal. Because grizzlies are being killed at a rate the slowly-reproducing animals cannot tolerate long-term; since 2002 the population has probably declined. Because connectivity with other bears depends upon GYE grizzlies roaming and hunting would preclude that. Because human caused mortality is mostly avoidable and prevention is not stressed enough. Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable. Because sport trophy hunting of grizzly bears would be abhorrent and would reverse recovery. Because tolerant bears that people see around the parks would be the first killed. Because wildlife watchers are ignored by state wildlife agencies and the USFWS. Just look at wolf and bison management. Because tribal interests are ignored by state wildlife agencies. Because wildlife watching brings in far more economically than does hunting in GYE states. Because listing the grizzly as a distinct population segment (DPS) is possibly illegal, because it precludes the bears seeking connectivity. Because the GYE grizzly bear lives on an ecological island. Because politics trumps science every time. We love our grizzly bears and want them protected from nefarious forces bent upon hunting them. USFWS should listen to the public's concerns, listen to opposing scientists and do the right thing. Do not delist the grizzly bear.	FWS-R6-ES-2016-0042-0422	

1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada.	1001				Factor E	1. Oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in	FWS-R6-ES-2016-0042-0456	
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The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem.	1002	1006			Factor E	1. Oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will decrease. No one	FWS-R6-ES-2016-0042-0456	

The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Å	1006	1000				Factor E	The U.S. Fish and Wildlife Service (FWS) wants to strip Endangered Species Act protection from the Greater Yellowstone Ecosystem grizzly bear. We have only until May 10 to comment on the FWS proposal. FWS claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claim: The shortage of cutthroat trout and white bark pine nutstwo of the grizzly's primary foods is not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. FWS claim: Their agency will stay involved with protecting the grizzly population after delisting. The reality: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that removing grizzly bears in the Greater Yellowstone Ecosystem from the protection of the Endangered Species Act at this time would be an enormous mistake. Threats to the species are increasing, not decreasing. Increasing numbers of people are living in and visiting the GYE, and some are pursuing more radically disruptive activities. Scientists and managers are just starting to get a handle on climate change and what it will mean for this area and wildlife. Fish & Wildlife Service's opinion that climate change is no problem for grizzly bears is just not credible. There is much uncertainty about the future of important grizzly bear foods. As a pilot, flying professionally and recreationally in the GYE since the late 1980s, I have witnessed the rapid death of huge swaths of forests in the mountains, including most of the old whitebark pine stands that produced most of the pine seeds. The loss of this important bear food will take a long time to manifest itself fully or even to be understood, particularly if the other most important foods are reduced by climate change or other factors. Elk numbers could decline sharply if chronic wasting disease becomes established. Cutthroat trout, even if recovering slowly in the Yellowstone Lake area, face a bleak future as spawning streams decline due to drought effects. Moth sites in the high mountains could also diminish, and they are highly vulnerable to human disturbance. The science claimed by the government to support delisting has considerable, undisclosed uncertainty. From 1988 to 1997, I was the pilot of many official grizzly bear observation flights in the GYE, working out of Driggs, Idaho with Western Air Research. Observers I flew with varied a lot in their ability to see bears, and in their tolerance for the kind of flying best applied to finding bears. How many bears we saw during a flight seemed to have as much or more to do with the day's conditions, the observer's characteristics, and luck than anything else. Some bears ran for cover immediately, making it hard to know how many cubs a female had with her. Success was high in open areas, so we spent more time flying in those areas. It was hard to know if we saw individual bears more than once on any given flight. Lighting conditions change continually with aircraft direction and clouds, etc., so a bear that looked dark could look light, adding to the problem of distinguishing animals. Having experienced these issues, I find it hard to accept that the government knows accurately how many bears there are, based on the number of observed bears. Statistics can handle some problems, but large variations in observations cannot be avoided. This makes for very poor confidence margins. The idea that the government will know when the number declines to "500 bears" or "612 bears" is a fable. It is clear that the state game agencies want to implement grizzly bear trophy hunting as soon as they can. The killing of bears for sport and pleasure is not acceptable to me, and I believe that is true for the majority of the public. As a resident of Wyoming, I see that Wyoming Game & Fish Department has these problems: (1) a high intolerance of predatory wildlife, as we see in their endorsement of not protecting wolves in most of the state, and trying to aim for the near-minimum number of wolves in the trophy hunting zone. (2) chronic problems maintaining some species that WGFD issues licenses for, including mule deer and moose, whose numbers have dropped sharply, while elk are maintained due to being fed through the winter on food provided, which is headed for the problems with chronic wasting disease.	FWS-R6-ES-2016-0042-5043	
There is much uncertainty about the future of important grizzly bear foods. As a pilot, flying professionally and recreationally in the GYE since the late 1980s, I have witnessed the rapid death of huge swaths of forests in the mountains, including most of the old whitebark pine stands that produced most of the pine seeds. The loss of this important bear food will take a long time to manifest itself fully or even to be understood, particularly if the other most important foods are reduced by climate change or other factors. Elk numbers could decline sharply if chronic wasting disease becomes established. Cutthroat trout, even if recovering slowly in the Yellowstone Lake area, face a bleak future as spawning streams decline due to drought effects. Moth sites in the high mountains could also diminish, and they are highly vulnerable to human disturbance.	1002	1006	1005	1003	1004	Factor E	There is much uncertainty about the future of important grizzly bear foods. As a pilot, flying professionally and recreationally in the GYE since the late 1980s, I have witnessed the rapid death of huge swaths of forests in the mountains, including most of the old whitebark pine stands that produced most of the pine seeds. The loss of this important bear food will take a long time to manifest itself fully or even to be understood, particularly if the other most important foods are reduced by climate change or other factors. Elk numbers could decline sharply if chronic wasting disease becomes established. Cutthroat trout, even if recovering slowly in the Yellowstone Lake area, face a bleak future as spawning streams decline due to drought effects. Moth sites in the high mountains could also diminish, and they are highly vulnerable to human disturbance.	FWS-R6-ES-2016-0042-5038	
EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources.DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes.	1002	1000				Factor E	I do not support the delisting of Grizzly Bears in GYE. THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected.	FWS-R6-ES-2016-0042-5651	

Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources.	1000	1002	1003	1006	Factor E	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife, primarily grizzlies and wolves. Allowing a "trophy" hunt, targeting the park grizzlies is not only an easy hunt, but not a hunt at all, no less an ambush of the species. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, even resistant to managing a species of high importance to the non-hunting public and/or the federal government (i.e. - Gray wolves). In addition, even with Federal Protections, there have been too many human caused direct killings of Grizzly Bears and this will most certainly go under	FWS-R6-ES-2016-0042-0463	
(4) poor grizzly genetic diversity and U.S. Fish and Wildlife Service's failure to improve the bears' genetics by bringing in an outside grizzly like they said they would do,	1001				Factor E	Delisting the grizzly bear is a misguided decision, and one based on politics, not science. Specifically, my concerns about the delisting are as follows: (1) availability of food for the bears, (2) a multi-year (too long) period needed to verify and take action on the grizzly population drop, (3) a primary conservation zone that is far too small, (4) poor grizzly genetic diversity and U.S. Fish and Wildlife Service's failure to improve the bears' genetics by bringing in an outside grizzly like they said they would do, and (5) removing grizzlies from the fringes will have negative impacts inside the primary zone for dispersal and bear cubs when a large bear is killed (new grizzlies move into his vacant territory and try to kill the bear cubs). In no way is the grizzly bear population in a health enough position to be delisted. Please reconsider this poor proposal and maintain the grizzly on the federal list of endangered and threatened wildlife. Thank you!	FWS-R6-ES-2016-0042-5081	
While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations.	1002	1006	1000		Factor E	WHY? IS MY QUESTION! Why in the world would you try to eradicate the Grizzly Bear population again? It is so unfortunate that Fish and Wildlife service doesn't seem to exist to protect the wildlife but to destroy it. You always come up with phony reasons to open fire on anything that moves. I get the feeling that you are a bunch of hunters anxious to pull the trigger legally. Just to refresh your memory: The grizzly bear once roamed free throughout the Western states, including 52 of California's 58 counties. Abundant in the Central Valley and North Bay in the 1800s, California grizzlies were also seen feasting on decaying whale carcasses along the shores of Monterey Bay. The last grizzly in California was shot by hunters in the 1920s, although it remains the familiar icon on our state flag. In state after state, ranchers and hunters wiped out local populations, until they were isolated in but a few small ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the greater Yellowstone population was estimated at 300 BEARS. Due to coordinated efforts by federal and state resources agencies mandated by the ESA, cooperative research, monitoring, habitat protections and regulatory mechanisms, including a strict hunting ban, their numbers have grown over the past 30 years to slightly more than 600 BEARS today, according to U.S. Fish and Wildlife's bear recovery coordinator, Chris Servheen. This is a success story that must be acknowledged and celebrated. I do not have to give you the details about why Grizzlies should remain protected, you know them as well as I do. But just in case: While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long term survival. The grizzly bear, no more than any other wildlife species, represents the wilderness that should be preserved.	FWS-R6-ES-2016-0042-5079	

Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures.						Factor E	WHY? IS MY QUESTION! Why in the world would you try to eradicate the Grizzly Bear population again? It is so unfortunate that Fish and Wildlife service doesn't seem to exist to protect the wildlife but to destroy it. You always come up with phony reasons to open fire on anything that moves. I get the feeling that you are a bunch of hunters anxious to pull the trigger legally. Just to refresh your memory: The grizzly bear once roamed free throughout the Western states, including 52 of California's 58 counties. Abundant in the Central Valley and North Bay in the 1800s, California grizzlies were also seen feasting on decaying whale carcasses along the shores of Monterey Bay. The last grizzly in California was shot by hunters in the 1920s, although it remains the familiar icon on our state flag. In state after state, ranchers and hunters wiped out local populations, until they were isolated in but a few small ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the greater Yellowstone population was estimated at 300 BEARS. Due to coordinated efforts by federal and state resources agencies mandated by the ESA, cooperative research, monitoring, habitat protections and regulatory mechanisms, including a strict hunting ban, their numbers have grown over the past 30 years to slightly more than 600 BEARS today, according to U.S. Fish and Wildlife's bear recovery coordinator, Chris Servheen. This is a success story that must be acknowledged and celebrated. I do not have to give you the details about why Grizzlies should remain protected, you know them as well as I do. But just in case: While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's	FWS-R6-ES-2016-0042-5079	
Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source."	1001	1002				Factor E	I am a scientist, I do not have a conscience and none of the rednecks states sense, lets my will come that the grizzly bears should not be delisted in the Greater Yellowstone Ecosystem. Actual numbers of grizzly bears are merely estimates as are the numbers required to support a sustainable populations for one of the slowest-reproducing mammals in North America with female grizzlies giving birth only every three years, if conditions are right. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399 would be threatened by the delisting. FWS could well see more than 40 years of recovery efforts squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America.. By the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range and grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. The management of isolated populations of free-ranging carnivores like grizzly bears and wolves is flawed. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. A leaked memo states that if the GYE grizzly bears are delisted, that they will open up trophy hunting seasons for grizzlies in Wyoming, Idaho and Montana which suggests that opening such seasons is a prime motivation for the states in pushing for de-listing. The FWS needs to strongly consider the majority interests of the American people including hunters. A recent national poll on behalf of the	FWS-R6-ES-2016-0042-5116	
From the Yellowstone Park website: 'Bear mortality rates aren't the only worry for biologists. There's also the issue of genetic isolation among the bears in the Greater Yellowstone. The Yellowstone population has less genetic variation than is found in any other remnant population in North America. Researcher Lance Craighead and others have found that the Yellowstone grizzlies have lost 15-20 percent of their genetic variability over the past century. This could lead to inbreeding and worsen problems stemming from food loss, habitat loss and conflicts with people. Researchers Lisette Waites and Craig Miller have calculated that the Yellowstone population would need 1,850 grizzlies to maintain long-term genetic viability. Importing all those bears from Canada is not an acceptable option. Dr. Michael Gibeau, the foremost bear expert in Alberta, said the province has only 500 bears. "They're skinny and stressed," he said, from rampant energy and economic development and fragmentation of habitat. Gibeau said a female grizzly in Alberta needs 500 square kilometers of habitat, while a male needs 1,500-6,000 square kilometers, due to highly fragmented and lower quality habitats. Tapping Alberta bears to make up for U.S. losses is unrealistic, he said. "Bears are caught in a giant pinball game, bumping against people and mountain peaks," Gibeau said. In his research, he's found a linear relationship between road density and bear mortality: more roads mean more dead bears, because more roads increase opportunities for bears and people to meet. Yet Servheen maintains that bear numbers in the Greater Yellowstone ecosystem will be closely monitored. If numbers should fall to 500, he told the Los Angeles Times earlier this year, that would trigger a management review, and a review could lead to an emergency relisting of grizzlies under the Endangered Species Act. "That's very discretionary and very fuzzy," countered Willcox. "There are no hard triggers anywhere in the state or federal plans," she said - no single, lower population number for grizzlies that would trigger an automatic relisting under the Endangered Species Act. Willcox's fear is that without a hard trigger, the states and U.S. Fish & Wildlife will use adaptive management to ineffectively tweak this or that aspect of this or that state plan, while habitat continues to be lost to development, foods continue to decline and bears continue to die. And, Willcox noted, the Bush administration has not voluntarily listed a single species in over four years - despite a backlog of thousands of species in danger of extinction. The political opposition to relisting grizzlies would be tremendous. Relisting might never occur, said Willcox, or come too late to do any good.' Please, do not delist these bears.	1001					Factor E	From the Yellowstone Park website: 'Bear mortality rates aren't the only worry for biologists. There's also the issue of genetic isolation among the bears in the Greater Yellowstone. The Yellowstone population has less genetic variation than is found in any other remnant population in North America. Researcher Lance Craighead and others have found that the Yellowstone grizzlies have lost 15-20 percent of their genetic variability over the past century. This could lead to inbreeding and worsen problems stemming from food loss, habitat loss and conflicts with people. Researchers Lisette Waites and Craig Miller have calculated that the Yellowstone population would need 1,850 grizzlies to maintain long-term genetic viability. Importing all those bears from Canada is not an acceptable option. Dr. Michael Gibeau, the foremost bear expert in Alberta, said the province has only 500 bears. "They're skinny and stressed," he said, from rampant energy and economic development and fragmentation of habitat. Gibeau said a female grizzly in Alberta needs 500 square kilometers of habitat, while a male needs 1,500-6,000 square kilometers, due to highly fragmented and lower quality habitats. Tapping Alberta bears to make up for U.S. losses is unrealistic, he said. "Bears are caught in a giant pinball game, bumping against people and mountain peaks," Gibeau said. In his research, he's found a linear relationship between road density and bear mortality: more roads mean more dead bears, because more roads increase opportunities for bears and people to meet. Yet Servheen maintains that bear numbers in the Greater Yellowstone ecosystem will be closely monitored. If numbers should fall to 500, he told the Los Angeles Times earlier this year, that would trigger a management review, and a review could lead to an emergency relisting of grizzlies under the Endangered Species Act. "That's very discretionary and very fuzzy," countered Willcox. "There are no hard triggers anywhere in the state or federal plans," she said - no single, lower population number for grizzlies that would trigger an automatic relisting under the Endangered Species Act. Willcox's fear is that without a hard trigger, the states and U.S. Fish & Wildlife will use adaptive management to ineffectively tweak this or that aspect of this or that state plan, while habitat continues to be lost to development, foods continue to decline and bears continue to die. And, Willcox noted, the Bush administration has not voluntarily listed a single species in over four years - despite a backlog of thousands of species in danger of extinction. The political opposition to relisting grizzlies would be tremendous. Relisting might never occur, said Willcox, or come too late to do any good.' Please, do not delist these bears.	FWS-R6-ES-2016-0042-5147	

The conservation efforts that have been deployed to encourage the Grizzly Bears recovery have been a great success. However, these efforts should be continued until Grizzly populations are connected over the entire landscape between Yellowstone and the Yukon. Isolated populations do not do well over the long run. Grizzly Bears need to be allowed to roam freely through all areas with suitable habitat. The Yellowstone grizzly bear population is an isolated population. There is very little evidence that Grizzly Bears from Yellowstone travel to other Grizzly Bear populations to the north.	1001					Factor E	To the U.S. Fish and Wildlife Service: I am writing for the board of directors of the North Fork Preservation Association to comment on the proposal to remove Grizzly Bears in the Greater Yellowstone Ecosystem from the Federal List of endangered and threatened wildlife. Our community on the North Fork of the Flathead River in Northwest Montana, sitting just below the U.S./Canadian border next to Glacier National Park is one of the most ecologically diverse regions in North America. We also have the highest population of Grizzly Bears in the lower 48 states. Surrounded by public land and wildlife habitat, we have learned to live peacefully in the Grizzlies country. We value these bears and have enjoyed watching their numbers grow over the last few decades. The conservation efforts that have been deployed to encourage the Grizzly Bears recovery have been a great success. However, these efforts should be continued until Grizzly populations are connected over the entire landscape between Yellowstone and the Yukon. Isolated populations do not do well over the long run. Grizzly Bears need to be allowed to roam freely through all areas with suitable habitat. The Yellowstone grizzly bear population is an isolated population. There is very little evidence that Grizzly Bears from Yellowstone travel to other Grizzly Bears to the north. Without this connectivity, genetic diversity cannot remain strong in the Yellowstone population. For this reason, we feel that it is too early to delist Grizzly Bears. We also disagree with trophy hunting grizzly bears. It has taken many decades and millions of our tax dollars to change the trend toward extinction and hunting these iconic creatures seems contrary to everything that we have achieved. In addition, the status of Grizzly Bears in the public mind has risen. Many visitors come to Montana and Wyoming hoping to see a Grizzly Bear. These bears are the heritage of all of the people in the U.S., not just those of us who live in Montana, Wyoming, or Idaho. Just from an economic viewpoint these Bears generate more income for Montana, Wyoming, and Idaho from visitors than will ever be realized from 10-50 annual Trophy Tags. There are many more people who want to see a grizzly bear than shoot one. There also needs to be adequate and continual funding for Bear conservation in place, including bear management personnel to deal with bear-people conflicts, before delisting happens. The loss of federal money for conservation efforts is a major concern regarding delisting. For these reasons, we oppose the delisting of Grizzly Bears at this time.	FWS-R6-ES-2016-0042-5128	
establish a steady population that doesn't become stuck with a single genetic strain before we go forward with any consideration of delisting.	1001					Factor E	We need to take the presence of these animals more seriously. With forest fires a new threat in many areas, hunting and/or poaching, and natural factors can threaten the species right back onto the endangered list. We don't need to bow to the pressures of trophy hunters; establish a steady population that doesn't become stuck with a single genetic strain before we go forward with any consideration of delisting.	FWS-R6-ES-2016-0042-5134	
The FWS needs to strongly consider the majority interests of the American people including hunters. A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following:-55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. -More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. -Only 20% support trophy hunting. -50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. -62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS needs to make a concerted effort to work with the Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting.	1007					Factor E	I am a veterinarian, a biologist and a concerned citizen and for the reasons stated below, it is my firm contention that grizzly bears should not be delisted in the Greater Yellowstone Ecosystem. Actual numbers of grizzly bears are merely estimates as are the numbers required to support a sustainable populations for one of the slowest-reproducing mammals in North America with female grizzlies giving birth only every three years, if conditions are right. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399 would be threatened by the delisting. FWS could well see more than 40 years of recovery efforts squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. By the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range and grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yaak region." Therefore, the grizzly bear cannot be delisted in just the GYE. The management of isolated populations of free-ranging carnivores like grizzly bears and wolves is flawed. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. A leaked memo states that if the GYE grizzly bears are delisted, that they will open up trophy hunting seasons for grizzlies in Wyoming, Idaho and Montana which suggests that opening such seasons is a prime motivation for the states in pushing for de-listing. The FWS needs to strongly consider the majority interests of the American people including hunters. A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: -55% of voters oppose the FWS proposal	FWS-R6-ES-2016-0042-5116	

The fragility of the population in terms of genetic isolation and importance of those genetics for the North American population as a whole should be the key deciding factor for keeping these majestic North American mammals on the the protected list.	1001					Factor E	I would opt to keep the greater Yellowstone grizzly bear listed as Endangered and Threatened Wildlife. The fragility of the population in terms of genetic isolation and importance of those genetics for the North American population as a whole should be the key deciding factor for keeping these majestic North American mammals on the the protected list.	FWS-R6-ES-2016-0042-5152	
1) Quantity/quality of habitat. Climate change and development pressure continue to impact grizzly bear food sources and habitat. Traditional food sources (whitebark pine, cutworm moths, cutthroat trout) are threatened by climate change and invasive species. Development continues to fragment the edges and connectivity of core grizzly bear range. Management needs to aggressively protect habitat including limiting development and road densities in core areas. USFWS needs to work with states and other land management agencies to ensure long-term habitat protection.	1006	1002	1003	1004	1001	Factor E	I am writing to say I do not support the USFWS plan to delist the grizzly bear. Grizzly bear recovery has been a slowly successful, long-term process for the Interagency Grizzly Bear Study Team; they should be proud of their efforts. But I don't believe there is scientific consensus that the species is beyond the need for protection. And I don't believe there is agreement among all interests that the grizzly population is stable enough to withstand hunting. The USFWS states in a their press release from March 3, 2016 that delisting does not solely rely on numbers but also includes "the quantity and quality of habitat, adequate regulatory mechanisms to maintain a healthy and viable population, and a good balance of male and female bears that are well-distributed throughout the ecosystem." I believe all of these factors are unresolved and continue to place the grizzly bear at risk. 1) Quantity/quality of habitat. Climate change and development pressure continue to impact grizzly bear food sources and habitat. Traditional food sources (whitebark pine, cutworm moths, cutthroat trout) are threatened by climate change and invasive species. Development continues to fragment the edges and connectivity of core grizzly bear range. Management needs to aggressively protect habitat including limiting development and road densities in core areas. USFWS needs to work with states and other land management agencies to ensure long-term habitat protection. 2) Regulatory mechanisms. There are not adequate regulatory mechanisms in place to guarantee grizzly populations are maintained, especially if hunting is allowed. USFWS and states need to set strict caps on grizzly mortality and ensure mechanisms and funding are in place to reduce human-bear conflict. 3) Bear distribution. Scientists and concerned citizens have always maintained that in order to ensure a strong and stable population there must be a genetic connectivity to other grizzly populations in the Northern Rockies. I am concerned that pressure from hunting and other human-bear conflict will continue to isolate the Greater Yellowstone population. On an emotional and intellectual level I just don't believe an iconic animal such as the grizzly bear should be hunted. If they were restored to their historic range and allowed to roam the Rocky Mountains, the Great Plains and the Central Valley I might feel differently, but that is never going to happen. I think there is too much risk of increased mortality to bears if a spring and fall hunting season is opened. Finally, I don't think delisting is an appropriate tool of adaptive management when applied to conservation biology. I'm not sure it works well within the regulatory framework of the Endangered Species Act. It is too coarse, too slow, and does not allow for versatile adaptability. I think it will be much more challenging to relist the grizzly than it is to delist (which is proving challenging enough). The numbers might look good at this moment in time but I'm worried about the long-term trend, with unresolved pressure from climate change and habitat fragmentation, on the stability of the grizzly bear.	FWS-R6-ES-2016-0042-5158	
3) Bear distribution. Scientists and concerned citizens have always maintained that in order to ensure a strong and stable population there must be a genetic connectivity to other grizzly populations in the Northern Rockies. I am concerned that pressure from hunting and other human-bear conflict will continue to isolate the Greater Yellowstone population.	1001					Factor E	I am writing to say I do not support the USFWS plan to delist the grizzly bear. Grizzly bear recovery has been a slowly successful, long-term process for the Interagency Grizzly Bear Study Team; they should be proud of their efforts. But I don't believe there is scientific consensus that the species is beyond the need for protection. And I don't believe there is agreement among all interests that the grizzly population is stable enough to withstand hunting. The USFWS states in a their press release from March 3, 2016 that delisting does not solely rely on numbers but also includes "the quantity and quality of habitat, adequate regulatory mechanisms to maintain a healthy and viable population, and a good balance of male and female bears that are well-distributed throughout the ecosystem." I believe all of these factors are unresolved and continue to place the grizzly bear at risk. 1) Quantity/quality of habitat. Climate change and development pressure continue to impact grizzly bear food sources and habitat. Traditional food sources (whitebark pine, cutworm moths, cutthroat trout) are threatened by climate change and invasive species. Development continues to fragment the edges and connectivity of core grizzly bear range. Management needs to aggressively protect habitat including limiting development and road densities in core areas. USFWS needs to work with states and other land management agencies to ensure long-term habitat protection. 2) Regulatory mechanisms. There are not adequate regulatory mechanisms in place to guarantee grizzly populations are maintained, especially if hunting is allowed. USFWS and states need to set strict caps on grizzly mortality and ensure mechanisms and funding are in place to reduce human-bear conflict. 3) Bear distribution. Scientists and concerned citizens have always maintained that in order to ensure a strong and stable population there must be a genetic connectivity to other grizzly populations in the Northern Rockies. I am concerned that pressure from hunting and other human-bear conflict will continue to isolate the Greater Yellowstone population. On an emotional and intellectual level I just don't believe an iconic animal such as the grizzly bear should be hunted. If they were restored to their historic range and allowed to roam the Rocky Mountains, the Great Plains and the Central Valley I might feel differently, but that is never going to happen. I think there is too much risk of increased mortality to bears if a spring and fall hunting season is opened. Finally, I don't think delisting is an appropriate tool of adaptive management when applied to conservation biology. I'm not sure it works well within the regulatory framework of the Endangered Species Act. It is too coarse, too slow, and does not allow for versatile adaptability. I think it will be much more challenging to relist the grizzly than it is to delist (which is proving challenging enough). The numbers might look good at this moment in time but I'm worried about the long-term trend, with unresolved pressure from climate change and habitat fragmentation, on the stability of the grizzly bear.	FWS-R6-ES-2016-0042-5158	

However, there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival.	1001					Factor E	However, there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. Thank you so much for your attention, Susan Goldstein	FWS-R6-ES-2016-0042-5181	
In addition, the status of Grizzly Bears in the public mind has risen. Many visitors come to Montana and Wyoming hoping to see a Grizzly Bear. These bears are the heritage of all of the people in the U.S., not just those of us who live in Montana, Wyoming, or Idaho. Just from an economic viewpoint these Bears generate more income for Montana, Wyoming, and Idaho from visitors than will ever be realized from 10-50 annual Trophy Tags. There are many more people who want to see a grizzly bear than shoot one.						Factor E	To the U.S. Fish and Wildlife Service: I am writing for the board of directors of the North Fork Preservation Association to comment on the proposal to remove Grizzly Bears in the Greater Yellowstone Ecosystem from the Federal List of endangered and threatened wildlife. Our community on the North Fork of the Flathead River in Northwest Montana, sitting just below the U.S./Canadian border next to Glacier National Park is one of the most ecologically diverse regions in North America. We also have the highest population of Grizzly Bears in the lower 48 states. Surrounded by public land and wildlife habitat, we have learned to live peacefully in the Grizzlys country. We value these bears and have enjoyed watching their numbers grow over the last few decades. The conservation efforts that have been deployed to encourage the Grizzly Bears recovery have been a great success. However, these efforts should be continued until Grizzly populations are connected over the entire landscape between Yellowstone and the Yukon. Isolated populations do not do well over the long run. Grizzly Bears need to be allowed to roam freely through all areas with suitable habitat. The Yellowstone grizzly bear population is an isolated population. There is very little evidence that Grizzly Bears from Yellowstone travel to other Grizzly Bear populations to the north. Without this connectivity, genetic diversity cannot remain strong in the Yellowstone population. For this reason, we feel that it is too early to delist Grizzly Bears. We also disagree with trophy hunting grizzly bears. It has taken many decades and millions of our tax dollars to change the trend toward extinction and hunting these iconic creatures seems contrary to everything that we have achieved. In addition, the status of Grizzly Bears in the public mind has risen. Many visitors come to Montana and Wyoming hoping to see a Grizzly Bear. These bears are the heritage of all of the people in the U.S., not just those of us who live in Montana, Wyoming, or Idaho. Just from an economic viewpoint these Bears generate more income for Montana, Wyoming, and Idaho from visitors than will ever be realized from 10-50 annual Trophy Tags. There are many more people who want to see a grizzly bear than shoot one. There also needs to be adequate and continual funding for Bear conservation in place, including bear management personnel to deal with bear-people conflicts, before delisting happens. The loss of federal money for conservation efforts is a major concern regarding delisting. For these reasons, we oppose the delisting of Grizzly Bears at this time.	FWS-R6-ES-2016-0042-5128	
First of all, two main food sources of Yellowstone grizzlies- Whitebark Pine Nuts and Cutthroat Trout- are not stable, and it is unclear what effect their further decline will have on grizzlies who rely heavily on them for food. The Center for Biological Diversity recognizes the threat of climate change on these food sources and therefore on the grizzly.	1002	1003	1006			Factor E	I do not support removing the GYE grizzly bear population protections. As a guide and educator in the Greater Yellowstone Ecosystem, I believe that there are some flaws with this proposal. First of all, two main food sources of Yellowstone grizzlies- Whitebark Pine Nuts and Cutthroat Trout- are not stable, and it is unclear what effect their further decline will have on grizzlies who rely heavily on them for food. The Center for Biological Diversity recognizes the threat of climate change on these food sources and therefore on the grizzly. Grizzly mortality is also increasing. Even if there were an accurate count of grizzlies in the ecosystem, this should be cause for concern. Their range is also merely a fraction of what it was historically-somewhere around 4%. Is that really enough range to be considered recovered to a point where delisting can be an option? Also, many Native American tribes oppose the delisting of the grizzly, and I stand by their opposition as the grizzly is culturally and environmentally important to them. Having seen the treatment of wolves in the states of Montana, Idaho, and Wyoming following their delisting, I have little confidence in the ability of the states to manage another large predator with trophy hunts. Wyoming had its control of wolves revoked; and I do not believe they will do any better with their control of grizzlies. The grizzly bear is still a recovering, threatened animal in the Greater Yellowstone Ecosystem.	FWS-R6-ES-2016-0042-5204	

Also, many Native American tribes oppose the delisting of the grizzly, and I stand by their opposition as the grizzly is culturally and environmentally important to them.	1007					Factor E	I do not support removing the GYE grizzly bear population protections. As a guide and educator in the Greater Yellowstone Ecosystem, I believe that there are some flaws with this proposal. First of all, two main food sources of Yellowstone grizzlies- Whitebark Pine Nuts and Cutthroat Trout- are not stable, and it is unclear what effect their further decline will have on grizzlies who rely heavily on them for food. The Center for Biological Diversity recognizes the threat of climate change on these food sources and therefore on the grizzly. Grizzly mortality is also increasing. Even if there were an accurate count of grizzlies in the ecosystem, this should be cause for concern. Their range is also merely a fraction of what it was historically-somewhere around 4%. Is that really enough range to be considered recovered to a point where delisting can be an option? Also, many Native American tribes oppose the delisting of the grizzly, and I stand by their opposition as the grizzly is culturally and environmentally important to them. Having seen the treatment of wolves in the states of Montana, Idaho, and Wyoming following their delisting, I have little confidence in the ability of the states to manage another large predator with trophy hunts. Wyoming had its control of wolves revoked; and I do not believe they will do any better with their control of grizzlies. The grizzly bear is still a recovering, threatened animal in the Greater Yellowstone Ecosystem.	FWS-R6-ES-2016-0042-5204	
The E.S.A. does not envision the restoration of endangered and threatened species to geographical "zoos", especially with such historically wide ranging species as the grizzly. It envisions restoration of species to their historic habitat, NOT CURRENTLY OCCUPIED HABITAT.Grizzlies didn't evolve in geographic zoos and until their extermination began in the 17th century , they were spread all over the WestThat means that their genetic diversity and long term survival depended upon, and depends upon now, adaptations to different environments and interchange with other populations throughout the WestThe intent of the E.S.A. is to replicate, as much as possible, these evolved natural conditions of the species. In other words, we're talking about a species that has an evolutionary biology and ecology that depends upon its being in lots of places at low densities rather than having large populations in a few places which would create serious biological and ecological problems.Grizzlies, being at the top of the food chain, are necessarily limited in number in specific areas by food availability.In short, that means what is natural for grizzlies is low densities in specific areas but widespread distribution of interconnected populations throughout the continent....this is how genetic diversity is maintained.....You maintain genetic diversity by having small stable populations spread widely across the landscape with dispersers moving among populations. It's about density and distribution and interconnectedness, not numbers of bears.I urge you to allow grizzlies to seek out new areas so that the connectedness will continue to spread. This WILL NOT be achieved under state management and under hunting pressure.	1001	1000				Factor E	I wish for the record to show that I am AGAINST the delisting of grizzlies in the Greater Yellowstone Ecosystem. The extirpation of grizzlies and other large carnivores from an ecosystem is a global phenomenon with broad ecological consequences. Grizzlies and other carnivores benefit and shape our North American ecosystems. The Endangered Species Act calls for restoration of threatened and endangered species to a SIGNIFICANT portion of their HISTORIC range. The word "historic" doesn't appear in the law, but "historic" is logically and scientifically inseparable from "significant". When USFWS wrote its first implementing regulation for the E.S.A., it interpreted the law and congressional intent to require restoration to historic ranges. This interpretation remained in place for over thirty years until the Bush Administration ILLEGALLY tried to reinterpret "range" to mean only "currently occupied" range to limit the biologically necessary but politically volatile expansion of such species as the wolf and grizzly bear. This latter day interpretation violates the restorative intent of the E.S.A. and the biological and ecological needs of the previously wide ranging species such as the Grizzly Bear. The E.S.A. does not envision the restoration of endangered and threatened species to geographical "zoos", especially with such historically wide ranging species as the grizzly. It envisions restoration of species to their historic habitat, NOT CURRENTLY OCCUPIED HABITAT. Grizzlies didn't evolve in geographic zoos and until their extermination began in the 17th century , they were spread all over the West That means that their genetic diversity and long term survival depended upon, and depends upon now, adaptations to different environments and interchange with other populations throughout the West The intent of the E.S.A. is to replicate, as much as possible, these evolved natural conditions of the species. In other words, we're talking about a species that has an evolutionary biology and ecology that depends upon its being in lots of places at low densities rather than having large populations in a few places which would create serious biological and ecological problems. Grizzlies, being at the top of the food chain, are necessarily limited in number in specific areas by food availability. In short, that means what is natural for grizzlies is low densities in specific areas but widespread distribution of interconnected populations throughout the continent....this is how genetic diversity is maintained.....You maintain genetic diversity by having small stable populations spread widely across the landscape with dispersers moving among populations. It's about density and distribution and interconnectedness, not numbers of bears. I urge you to allow grizzlies to seek out new areas so that the connectedness will continue to spread. This WILL NOT be achieved under state management and under hunting pressure. In summary...the E.S.A. requires grizzly restoration to the species historic range I ask you to take this into consideration and allow this dispersal to move forward without taking away the protections these bears need. If left to state management, this will not happen and once again grizzlies will persecuted and annihilated from our lands.	FWS-R6-ES-2016-0042-5190	
The number one threat to the GYE is climate change. We are currently experiencing an extinction rate 1000x greater than anything on the paleontological record, and it is our fault. Water availability affecting flora and fauna, foods for grizzlies, will be affected. Plants will be migrating up, or north and bears may not be able to follow them. A precarious population with an extremely low growth rate will not fare well under any circumstances, let alone one without utmost protection.Their threatened critical food sources (trout, whitebark pines) that are supposedly being replaced with other sources do not take into account the difference in caloric value, quality of food, seasonal needs, and availability without human interference. There are temporal, spatial, caloric and risk factors that aren't being addressed in the proposal.The "adaptable bear" argument is moot.	1006	1003	1002			Factor E	I have spend a significant amount of time in Yellowstone from 1995 to present. I have a deep love for the Greater Yellowstone Ecosystem and want my children to be able to grow up and see this land as I have come to know it -- a large are a of relatively undisturbed habitat. Removing Grizzly Bears will drastically change the dynamics of the ecosystem. We are going to see a decrease in bears WITHOUT hunting, due to development and an increase in the human population in the Greater Yellowstone Ecosystem (GYE), especially after delisting when so much of their habitat will be opened to fracking, natural gas development, mining and trophy homes. By the time we need to re-list, which will most certainly happen due to a variety of reasons below, we will have lost critical habitat and many other species under the grizzly umbrella. Having lived in the GYE for the past 20 years, learning and teaching about this ecosystem, I promise you, this will have major effects. The number one threat to the GYE is climate change. We are currently experiencing an extinction rate 1000x greater than anything on the paleontological record, and it is our fault. Water availability affecting flora and fauna, foods for grizzlies, will be affected. Plants will be migrating up, or north and bears may not be able to follow them. A precarious population with an extremely low growth rate will not fare well under any circumstances, let alone one without utmost protection. Their threatened critical food sources (trout, whitebark pines) that are supposedly being replaced with other sources do not take into account the difference in caloric value, quality of food, seasonal needs, and availability without human interference. There are temporal, spatial, caloric and risk factors that aren't being addressed in the proposal. The "adaptable bear" argument is moot. US FWS must submit their population data for proper peer review (the Interagency Grizzly Bear Study Team doesn't count.) There may well be 700 bears, but it is suspect that the number nearly doubled in 2007 when delisting was on the table. It is suspect that for many yrs the population was 260-600, then all of a sudden it was a solid 700. The methods involve a lot of extrapolation from very few verifiable sightings and that should make us nervous. An independent, unbiased, qualified source can be trusted with the geographic data the IGBST is reticent to release. The fact that the Northern Continental Divide Ecosystem bears are not on the chopping block is odd. There are more bears in that population, yet ours are threatened with less protection. The incredible pressure on this land for development of second (and third) homes, fracking, mining and general development is astonishing, and powerful enough to convince public officials we should throw caution to the wind and see how it goes. There was a 6% decrease in the past 2 years and at least 59 known dead last year (likely higher). This is a trend for the past few years. Actual numbers will rise and fall, but there is not an overall growth trend. Grizzly protection also shelters my sanity. To live and hike in griz country moves me to an equilibrium that's hard to find in an ever more deafening society, and it is irreplaceable. Being face to face with a grizzly leaves with my cells on fire, and a passion for life you cannot buy. Having a daughter later in life is directly tied to me raising her in a place where wilderness reigns.	FWS-R6-ES-2016-0042-5209	

#NAME?						Factor E	As a tax paying American I am asking that you do the right thing and NOT delist grizzlies! - DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states known for their hatred and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and most Americans (55%) oppose delisting. Even more Americans (68%) oppose hunting of grizzly bears if delisted. - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears.	FWS-R6-ES-2016-0042-5238	
Climate change brought about by man has caused the White Bark Pine to begin dying thus inviting the pine beetle to finish the job. Invasive Lake Trout were stocked in the lakes which prey on the indigenous Cutthroat Trout which does inhabit shallower waters enabling bears to catch and eat them. The Lake Trout are deep water inhabitants and eat the Cutthroat Trout as well. Bears cant catch the Lake Trout. Moth larvae has been contaminated by human pesticides.	1002	1006	1003	1004		Factor E	It is far too premature to consider delisting the Grizzly Bear. They have rebounded only 600 more in number in a 40 year period. Man has interfered with 3 of their 4 major food sources: Climate change brought about by man has caused the White Bark Pine to begin dying thus inviting the pine beetle to finish the job. Invasive Lake Trout were stocked in the lakes which prey on the indigenous Cutthroat Trout which does inhabit shallower waters enabling bears to catch and eat them. The Lake Trout are deep water inhabitants and eat the Cutthroat Trout as well. Bears cant catch the Lake Trout. Moth larvae has been contaminated by human pesticides. With their food sources depleted in one area, they have to range to locate new sources. Bears cannot be held responsible for our mistakes nor expected to abide by man made sanctions. You are basically implying that Bears starve to death or else you will hunt and kill them. Fixing mistakes with more mistakes is not a sane manner of resolving any issue. It is imperative to maintain the preservation of bears, their functions in the ecosystem which benefit humanity in many ways, including the prevention of lethal diseases...and bears do it for free! Please keep the bears and all predators protected. They have a priceless value alive. Thank you.	FWS-R6-ES-2016-0042-5263	
There is scientific uncertainty around the effects of climate change on grizzly bears; and their food sources. Connectivity remains a major problem; Yellowstone's grizzlies are isolated from their kfn In Glacier, a few hundred miles to the north. Moreover, it is likely the GYE population is no longer growing and most likely declining. The GYE population, along with grizzlies to the north, only represent a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the contiguous U.S. In a range that was formerly 100 times larger	1006	1000	1001			Factor E	See Attached Attachments Sheehy Pike Lisa	FWS-R6-ES-2016-0042-0522	Climate change impacts

There are still healthy stands of Whitebark Pine outside the PCA in the Northern and Southern Wind Rivers, vital food for grizzlies. These areas will be primarily managed by the states.	1002					Factor E	1) The Primary Conservation Area... (PCA) does not include all of Grand Teton National Park and areas of the Northern Wind Rivers and Upper Green River where grizzlies have long been established. The PCA should be expanded and updated to include these and all areas where grizzlies are currently found. 2) Areas outside the PCA are referred to the Demographic Management Area (DMA). The DMA will be mostly managed by state agencies. Fortunately a good chunk of grizzly habitat falls within tribal lands (in WY) not subject to heavy handed state mismanagement of predators. 3) The entirety of the Wyoming Range, Caribou Range (Idaho), and the Targhee National Forest west of Jackson, WY should be included in the DMA. Grizzly populations currently in the Wyoming Range and other areas that fall outside of the DMA, are subject to extreme management actions and killing by hunters. No incentive to protect bears in suitable habitat outside the DMA. 4) Grizzlies located outside the PCA will be "allowed to expand into biologically suitable and socially acceptable areas". How does a state, hostile to predators, identify what is socially acceptable. A blank check for heavy handed management. Again, areas in the Upper Green, around Teton Park, and the northern Wind River Range with established grizzly populations most likely will see dramatic decreases in numbers. 5) Maintain only 500 grizzlies in the Greater Yellowstone Ecosystem (GYE). With estimates over 700, there is no motivation for the states to maintain grizzly numbers. 6) There is already a lot of human caused mortality outside the PCA, especially in the Upper Green River and Wind River areas. This probably will become worse since the State will have primary management control in these areas. 7) There are still healthy stands of Whitebark Pine outside the PCA in the Northern and Southern Wind Rivers, vital food for grizzlies. These areas will be primarily managed by the states. 8) The Wyoming management of grizzlies in the DMA as stated in their management plan, "significant consideration will be given to humans". We can only assume grizzlies will pay with their lives more often at the hands of state employees. Socially Accepted = Intolerance. 9) Wyoming Plan and handling of nuisance bears; "Grizzlies displaying natural aggression may be removed from the population." Natural aggression is defined as a grizzly defending itself, cubs, or food source. In the DMA, seems like grizzlies will be killed when they simply defend themselves by our intrusions. 10) A grizzly getting into chicken coups (without electric fences or other means to try and deter grizzlies) most likely will be killed by game managers, especially in the DMA. This is an alarming trend in grizzly country with the rise of people wanting to raise their own chickens. Outside of cattle and sheep, chickens are resulting in dead grizzlies. 11) The concern over sport hunting is real. There should be a moratorium on any sport hunting for 10 years to ensure the State is doing all it can to preserve grizzlies. 12) I DO NOT support delisting grizzlies in the Greater Yellowstone Area. It ensures the population will remain an isolated population. Historically hostile views of western states towards predators is proof enough that grizzlies should not be delisted. Wyoming has yet to turn in an acceptable wolf plan. How can it be expected to manage the vast majority of grizzlies within the GYE.	FWS-R6-ES-2016-0042-0533	
It is too soon to remove the grizzly bear, because the long term effects of climate change on the species is too unknown to open the species up to state management, where the possibly for large scale hunting is very high. Many in the west view predators as an issue, but that approach should not influence the delisting of the GYE grizzly, because the future effects of climate change are too unknown.	1006					Factor E	The delisting of the GYE grizzly bears is premature. The grizzly bear was listed in 1975, and saw large population growth and stabilization. It has been listed for forty-one years, and while there has been significant growth in the program, when considering the possible implications of climate change and hunting on the species, forty-one years is not long enough time of protection. In allowing the states to manage the GYE grizzly bear that will allow the GYE, a game species, to potentially be hunted. The proposed rule states that Idaho, Wyoming, and Montana have no current plans to allow the grizzly to be hunted, but that proposition will not last long. State fish and wildlife agencies are more pliable than the federal government, increased public pressure to hunt the bears will lead to state regulated hunting. The proposed rule outlines the perimeters for federal intervention and hunting allowances, but that outline is insufficient, because it does not consider the cumulative effects of climate change and hunting on the species. The proposed rule discusses the possible impacts of climate change on the species separate of direct human impacts. The proposed rules fails to view both of these large impacts congruently. The proposed rule states that the hunting allowances can be changed year to year, giving some flexibility to agency. But this flexibility may not be enough. A large fire or extreme drought stemming from climate change following hunting season could decimate the population, even if the following hunting season is cancelled. These two large population controls need to be consider in tandem. The grizzly population recovery is important, predator species are so very important to the health of western ecosystems. It is too soon to remove the grizzly bear, because the long term effects of climate change on the species is too unknown to open the species up to state management, where the possibly for large scale hunting is very high. Many in the west view predators as an issue, but that approach should not influence the delisting of the GYE grizzly, because the future effects of climate change are too unknown. Forty-one years of recovery should not be hastily dashed, because of public pressure on limiting predator species.	FWS-R6-ES-2016-0042-0591	
In my opinion the delisting plan at the federal and state level needs to move forward finding a way to preserve the habitat and generate and preserve tolerance for the grizzly as both go hand in hand. Conflict reduction, human safety and education like the 360Bearwise program need to be top priorities.	1008					Factor E	See attached file(s) Attachments Delisting Grizzly Comments 4-12-16	FWS-R6-ES-2016-0042-0673	

2--The under-studied repercussions of climate change and the impact on the bear's food supply	1006	1000					Factor E	As a lifelong resident of the Greater Yellowstone Ecosystem, and one who has worked directly with the Inter Agency Recovery Team over a span of many years, I strongly oppose the delisting the the Grizzly bear. I join those who are concerned about: 1--The voracious desire, most notably by surrounding states of Wyoming and Montana, to capitalize financially on trophy hunting. 2--The under-studied repercussions of climate change and the impact on the bear's food supply. 3--Shrinking habitat, that is even now far too limited. 4--The unreasonable reliance of FWS on unreliable bear numbers. 5--The absence of corridors to permit grizzly migration. 6--The inability to forecast human caused bear mortality, that is only going to increase with development and population growth. The Yellowstone Grizzly is a national treasure. Removal from endangered/threatened status is trading that treasure for fool's gold. While it may be provide a boastful feather in the cap for FWS, it will prove to be one of the most ill-conceived proposals ever advanced by FWS.	FWS-R6-ES-2016-0042-0672	
The Act became a law before the realization that global warming is our over-riding ecological (and existential!) issue. No mega fauna is now safe. Even more micro fauna and flora are threatened. Many species are ASSURED of extinction. We are presently in an era of mass extinctions.	1006	1000					Factor E	This is a bad move. It is a "feel good" action to help critics accept the Endanger Species Act. The Act became a law before the realization that global warming is our over-riding ecological (and existential!) issue. No mega fauna is now safe. Even more micro fauna and flora are threatened. Many species are ASSURED of extinction. We are presently in an era of mass extinctions. Sorry folks, but there is nothing but bad news on the environmental front when viewed long term, which is the only way these things should be viewed. To put a good face on the grizzly bear situation is purely a political move. We should raise awareness on the issue of threatened species, global warming and extinction. Delisting the grizzly sends a message that will result in complacency and, even worse, HUNTING by the irresponsible state governments trying to appease special interests and market their state to a certain demographic. Scientist need to lead and educate lay people about the state of wildlife preservation in this country and the world. Things do not look promising. We need to protect and expand grizzly habitat to have any hope of keeping this high level predator around. It is an amazingly adaptable animal, but there are limits. It is already stressed with the failure of at least two critical food sources in the GYE. We would be adding insult to injury to delist. The pressures against the bear's survival mount up every day. Visitation to the parks is at a record level (yet another stress to the grizzly population). Virtually all of those visitors want there to be as many bears as the carrying capacity will allow.	FWS-R6-ES-2016-0042-0718	
We need to protect and expand grizzly habitat to have any hope of keeping this high level predator around. It is an amazingly adaptable animal, but there are limits. It is already stressed with the failure of at least two critical food sources in the GYE. We would be adding insult to injury to delist. The pressures against the bear's survival mount up every day. Visitation to the parks is at a record level (yet another stress to the grizzly population). Virtually all of those visitors want there to be as many bears as the carrying capacity will allow.	1000						Factor E	This is a bad move. It is a "feel good" action to help critics accept the Endanger Species Act. The Act became a law before the realization that global warming is our over-riding ecological (and existential!) issue. No mega fauna is now safe. Even more micro fauna and flora are threatened. Many species are ASSURED of extinction. We are presently in an era of mass extinctions. Sorry folks, but there is nothing but bad news on the environmental front when viewed long term, which is the only way these things should be viewed. To put a good face on the grizzly bear situation is purely a political move. We should raise awareness on the issue of threatened species, global warming and extinction. Delisting the grizzly sends a message that will result in complacency and, even worse, HUNTING by the irresponsible state governments trying to appease special interests and market their state to a certain demographic. Scientist need to lead and educate lay people about the state of wildlife preservation in this country and the world. Things do not look promising. We need to protect and expand grizzly habitat to have any hope of keeping this high level predator around. It is an amazingly adaptable animal, but there are limits. It is already stressed with the failure of at least two critical food sources in the GYE. We would be adding insult to injury to delist. The pressures against the bear's survival mount up every day. Visitation to the parks is at a record level (yet another stress to the grizzly population). Virtually all of those visitors want there to be as many bears as the carrying capacity will allow.	FWS-R6-ES-2016-0042-0718	

1) Climate Change is impacting the ecosystem - reducing white-bark pine nuts available to grizzlies.	1006	1002					Factor E	I am against the removal of the Greater Yellowstone Grizzly Bear Population from the Federal List of Endangered and Threatened Species for the following reasons: 1) Climate Change is impacting the ecosystem - reducing white-bark pine nuts available to grizzlies. 2) Climate Change is impacting and altering the ecosystem in ways that we do not foresee. 3) Human population growth and urban development infringes on habitat and connectivity between populations. 4) Disease can spread through a small population and reduce the population significantly and/or cause extinction - such as has occurred with Tasmanian Devil (Devil facial tumor disease). 5) There is no protected natural connectivity to the Selway Bitterroot area in Idaho. 6) There is no nearby grizzly population in the Selway Bitterroot area in Idaho. 6) Delisting will allow trophy hunting of the grizzly bear - which is a thoroughly disgusting and self centered pastime.	FWS-R6-ES-2016-0042-0727	
The grizzly is facing losses of some of their key food sources such as the white bark pine. This has been studied and the concerns of loss of these foods has been supported by the Ninth Circuit Court of Appeals, Federal District Judge Molloy. The cutthroat trout are also diminishing due to the introduction of non native species causing 2 of the grizzlies main food sources to scarce. With these food supplies short they must look elsewhere for new foods to replace these. With no protections outside the park they will not have the habitat needed to establish new food sources. The lack of food sources is what cause the very few and far between encounters with ranchers livestock. The adjoining states have already said and have it in their plans to allow killing of any grizzlies who pose a threat to their livestock.	1002	1003					Factor E	I strongly OPPOSE the delisting of the GYE grizzlies. The grizzly is facing losses of some of their key food sources such as the white bark pine. This has been studied and the concerns of loss of these foods has been supported by the Ninth Circuit Court of Appeals, Federal District Judge Molloy. The cutthroat trout are also diminishing due to the introduction of non native species causing 2 of the grizzlies main food sources to scarce. With these food supplies short they must look elsewhere for new foods to replace these. With no protections outside the park they will not have the habitat needed to establish new food sources. The lack of food sources is what cause the very few and far between encounters with ranchers livestock. The adjoining states have already said and have it in their plans to allow killing of any grizzlies who pose a threat to their livestock. The reproduction rate of the grizzly is slow and without the necessary food sources to make it through hibernation there will be fewer births. If you consider this in conjunction with the amount of bears each state is going to allowed to be hunted, the number of bears that will inevitably be killed because due to ranchers seeing them as a threat to their livestock, the current population of bears will not stand the reduction without grave consequences. The citizens of the united states have paid for the protection of these bears. Your office has been charged with the duty of safe guarding these bears and delisting them without more thought and planning for the delisting will certainly put them back in an endangered state. The areas which border the GYE is becoming more heavily populated. With the encroachment of development the bears have very little space in which to travel from one population to another for breeding. If there are no safe guards for the bears to migrate to other areas the population will be trapped, this again brings them to the point of being endangered. There is no reason for hunting a bear other than sport and the money the states have proposed to charge for the hunting of this prized animal will in no way cover the cost the tax payers have already paid to protect that bear. It just doesn't make sense. The ranches are compensated by the numerous willing organizations for the loss of any animal killed by a bear. So it is not like the grizzlies are out there destroying herds of cattle. In fact as per your own studies the losses of ranchers has been minimal, and the ranchers do not loss money. At the very least the Primary Conservation area should be increased to include bear corridors, and am ample area around the entire GYE for the bears. Encounters with bears for people are rare, and most of those have proven it was not the bears fault, but the people's; regardless those bears have been killed. If people are going to go into bear country and not be prepared it is their fault and the entire population of bears should not have to pay the price for human stupidity. If you allow the states to openly place and advertise these great bears can be shot for a trophy what are you saying about your plan and your entrusted duty to safe guard the animals of our great parks and country. The states of Wyoming and Idaho allow for baiting of bears. They are saying it will not be allowed for the grizzly but it is not in their plan and when someone baits a black bear and a grizzly shows up that someone will shoot it and claim they thought it was a black bear. The current grizzly population cannot withstand these additional killings. The grizzly was placed on the endangered species list and should remain so. There is no unified plan that has	FWS-R6-ES-2016-0042-0739	
I'm a biologist. What I got out of reading this document is that the USFWS wants to use its failure to recover the Greater Yellowstone Grizzly Bear population to the point where it can properly interact with other grizzly bear populations as an excuse to consider this population in isolation from the rest of the species. I see a population of 500 stated as sufficient to maintain genetic diversity, when what I was taught in school is that anything below 1,000 is at serious genetic risk, and that healthy populations need to be at 10,000 individuals or greater. I see mentions of acceptable mortality which I interpret as giving the go-ahead to hunting. No surprise there, as wildlife agencies at both state and federal level are incredibly spineless about protecting wildlife unless it can be a source of fee revenue. I totally OPPOSE the de-listing, under any of the alternatives. What the USFWS should be doing is working with adjacent public land agencies to remove the land use barriers such as sheep allotments and associated high-danger strips that mean that large amounts of otherwise suitable habitat for grizzlies is classified as uninhabitable.	1001						Factor E	I'm a biologist. What I got out of reading this document is that the USFWS wants to use its failure to recover the Greater Yellowstone Grizzly Bear population to the point where it can properly interact with other grizzly bear populations as an excuse to consider this population in isolation from the rest of the species. I see a population of 500 stated as sufficient to maintain genetic diversity, when what I was taught in school is that anything below 1,000 is at serious genetic risk, and that healthy populations need to be at 10,000 individuals or greater. I see mentions of acceptable mortality which I interpret as giving the go-ahead to hunting. No surprise there, as wildlife agencies at both state and federal level are incredibly spineless about protecting wildlife unless it can be a source of fee revenue. I totally OPPOSE the de-listing, under any of the alternatives. What the USFWS should be doing is working with adjacent public land agencies to remove the land use barriers such as sheep allotments and associated high-danger strips that mean that large amounts of otherwise suitable habitat for grizzlies is classified as uninhabitable.	FWS-R6-ES-2016-0042-0709	

Certainly climate change is having a negative impact on our wildlife but the political nature of this type of environmental deterioration is not taken into account.	1006					Factor E	Removing the Grizzly Bear from the endangered species list is a mistake that will ensure the need to reinstate this magnificent predator. I believe that the decision is not based on sound scientific information, but rather on the pressure of political entities. Because it is not defensible to make such important decisions based on political pressure, science is manipulated and misinterpreted to develop convenient findings to support the political decision. Predators play an overwhelmingly important role in the health of our ecosystems. However, throughout the history of the United States, our government and the general public have fostered a deep seated fear and demonization of predators, especially the large predators. This is evidenced by the near eradication of the Grizzly Bear and wolves and the widespread hatred of an essential species. Fear of predators has been institutionalized and the elimination of predators sold as a necessary program to protect protect livestock, and the western way of life. However, it doesn't take much effort to see the damage that such programs have on our ecosystems and the other problems that arise when predators are reduced to unsustainable population levels. Wildlife management decisions are too often based on the need to generate revenue and a perceived notion that large predators diminish our enjoyment of hunting big game species such as mule deer, elk. Certainly predators kill these species, but if we would allow the natural cycles of predators and game species to occur, we would find that our hunting would improve over time. We have created a hunger for revenue generated by the marketing of permits to kill large predators such as Grizzlies. What could stoke the prestige and ego more than shooting an evil killing machine as notorious as the Grizzly. Unfortunately, wildlife management decisions regarding the hunting of predators are often made with incomplete knowledge about the numbers of animals, the limiting effects of diminished habitat and the isolation of specie populations. Certainly climate change is having a negative impact on our wildlife but the political nature of this type of environmental deterioration is not taken into account. It is no secret that changing winter conditions in the northern Rockies is having a devastating impact on our forests. I have seen a significant change in the overall health of forests in the Sawtooth Mountains in Idaho. Most people might be surprised that a vital source of nourishment for the carnivorous beast, the Grizzly Bear, are pine nuts. Climate change has led to the rapid decline of the white bark pine and its production of nuts which are essential to the Grizzly. Wildlife managers have not given this fact enough weight in their decision making. After all, Grizzlies are carnivores, living by eating our precious game animals. Well, it is not so easy to replace an essential food source as important as the white bark pine nut is to the Grizzly. Imagine the impact on our food options if corn or wheat production was drastically reduced by some disease. Other important sources of nourishment for the Grizzlies are also experiencing declines putting further pressure on Grizzly survival. There really aren't that many Grizzlies in the Yellowstone area. Certainly many think that there are way too many and that hunting will help keep their populations in check. The resurgence of the Grizzly Bear over the past decades has been significant and credit must be given to the federal government for	FWS-R6-ES-2016-0042-0750	
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Thousands of park visitors have thrilled over viewing grizzly bear families (mother bears with young are more frequent along roads). One famous mother grizzly, known as number 399, is now in hibernation but frequents roadways in Grand Teton. A Jackson Hole, Wyoming, outfitter has reportedly pledged that this is the first bear he would target: "because he hates federal government, bear-loving environmentalists and the Endangered Species Act," according to journalist Todd Wilkinson.	1007					Factor E	The only certain outcome or destiny the Yellowstone grizzly bear is that it will result in trophy hunting or bears by the states of Wyoming, Montana, and Idaho. After spending a federal fortune each year since 1975 to bring the grizzly back from near extinction, we're now poised to abruptly begin killing them off for the bargain price of a hunting license. Why this fierce madness to kill our largest carnivore? I am a hunter who doesn't buy into the fatuous claims about the need to kill carnivores. Apex predators serve a complex and necessary role in ecological communities and in their own wild social communities. America's great bears today threaten our minds more than they do our bodies; by reminding us that upon occasions still possible today, we mighty humans were once just another flavor of meat. They challenge our notion of how we fit into the world and our dominion over it. And that's why we need them alive and roaming the land. A trophy hunt for grizzlies could begin, if we don't stop it, as early as next year. The danger is simple: In an isolated, island ecosystem like Yellowstone, once the number of dead bears greatly exceeds the number of cubs born, you're headed toward extinction. Here are the current stats: The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the, current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality. There is a very dark side to this lust for killing top carnivores. The first and easiest grizzlies to be killed will be the roadside bears of Yellowstone and Grand Teton national parks. These loved and most photographed bears have little fear of humans since wildlife is protected in national parks. Thousands of park visitors have thrilled over viewing grizzly bear families (mother bears with young are more frequent along roads). One famous mother grizzly, known as number 399, is now in hibernation but frequents roadways in Grand Teton. A Jackson Hole, Wyoming, outfitter has reportedly pledged that this is the first bear he would target: "because he hates federal government, bear-loving environmentalists and the Endangered Species Act," according to journalist Todd Wilkinson. Last year, during the furor over the killing of Cecil the African lion, Yellowstone park officials decided to kill another famous mother bear who had fatally mauled a photographer, and send her cubs to live in a zoo. The American public unloaded a ton of fury on the park's superintendent. There is more: Delisting the Yellowstone grizzlies will make them very easy for anyone to kill; without federal protection, their bearish lives will be made expendable. Witness how the only agreement by the three states is how they divide the spoils of Yellowstone into three piles of dead bears. The unmistakable message is that the only measure of value of these magnificent animals is as a head on the wall or a rug on the floor. Of the reported 59 grizzlies killed in 2015, more than half were	FWS-R6-ES-2016-0042-0779	
The Yellowstone ecosystem is in many ways a geographical island. Genetic diversity is essential for the sustainability of healthy species. Because of the relative isolation of large predators such as Grizzlies in Yellowstone, it is difficult to maintain a diverse gene pool. Hunting outside of the Park will make it even more difficult, adding another significant constraint on the sustainability of a healthy Grizzly Bear population.	1001					Factor E	...killing the Grizzly bear, from the biologists' species for a while and will ensure the need to return to a high level of predator. I believe that the decision is not based on sound scientific information, but rather on the pressure of political entities. Because it is not defensible to make such important decisions based on political pressure, science is manipulated and misinterpreted to develop convenient findings to support the political decision. Predators play an overwhelmingly important role in the health of our ecosystems. However, throughout the history of the United States, our government and the general public have fostered a deep seated fear and demonization of predators, especially the large predators. This is evidenced by the near eradication of the Grizzly Bear and wolves and the widespread hatred of an essential species. Fear of predators has been institutionalized and the elimination of predators sold as a necessary program to protect protect livestock, and the western way of life. However, it doesn't take much effort to see the damage that such programs have on our ecosystems and the other problems that arise when predators are reduced to unsustainable population levels. Wildlife management decisions are too often based on the need to generate revenue and a perceived notion that large predators diminish our enjoyment of hunting big game species such as mule deer, elk. Certainly predators kill these species, but if we would allow the natural cycles of predators and game species to occur, we would find that our hunting would improve over time. We have created a hunger for revenue generated by the marketing of permits to kill large predators such as Grizzlies. What could stoke the prestige and ego more than shooting an evil killing machine as notorious as the Grizzly. Unfortunately, wildlife management decisions regarding the hunting of predators are often made with incomplete knowledge about the numbers of animals, the limiting effects of diminished habitat and the isolation of specie populations. Certainly climate change is having a negative impact on our wildlife but the political nature of this type of environmental deterioration is not taken into account. It is no secret that changing winter conditions in the northern Rockies is having a devastating impact on our forests. I have seen a significant change in the overall health of forests in the Sawtooth Mountains in Idaho. Most people might be surprised that a vital source of nourishment for the carnivorous beast, the Grizzly Bear, are pine nuts. Climate change has led to the rapid decline of the white bark pine and its production of nuts which are essential to the Grizzly. Wildlife managers have not given this fact enough weight in their decision making. After all, Grizzlies are carnivores, living by eating our precious game animals. Well, it is not so easy to replace an essential food source as important as the white bark pine nut is to the Grizzly. Imagine the impact on our food options if corn or wheat production was drastically reduced by some disease. Other important sources of nourishment for the Grizzlies are also experiencing declines putting further pressure on Grizzly survival. There really aren't that many Grizzlies in the Yellowstone area. Certainly many think that there are way too many and that hunting will help keep their populations in check. The resurgence of the Grizzly Bear over the past decades has been significant and credit must be given to the federal government for	FWS-R6-ES-2016-0042-0750	
Global warming, which the FWS denies has any effect at all on the lives or futures of grizzlies, is in itself sufficient reason to never delist the Yellowstone grizzly. The federal government is not impressed by climate change and clearly states global warming is not a threat to grizzlies today or in the future. The FWS remains adamantly chained to this delusional stance despite a legal requirement to use "the best available science." In a recent lawsuit over wolverines, Climate change is a black hole of uncertainty for all species. Aside from the fact that it's coming to get us, nothing is sure.	1006					Factor E	The only certain outcome or destiny the Yellowstone grizzly bear is that it will result in trophy hunting or bears by the states of Wyoming, Montana, and Idaho. After spending a federal fortune each year since 1975 to bring the grizzly back from near extinction, we're now poised to abruptly begin killing them off for the bargain price of a hunting license. Why this fierce madness to kill our largest carnivore? I am a hunter who doesn't buy into the fatuous claims about the need to kill carnivores. Apex predators serve a complex and necessary role in ecological communities and in their own wild social communities. America's great bears today threaten our minds more than they do our bodies; by reminding us that upon occasions still possible today, we mighty humans were once just another flavor of meat. They challenge our notion of how we fit into the world and our dominion over it. And that's why we need them alive and roaming the land. A trophy hunt for grizzlies could begin, if we don't stop it, as early as next year. The danger is simple: In an isolated, island ecosystem like Yellowstone, once the number of dead bears greatly exceeds the number of cubs born, you're headed toward extinction. Here are the current stats: The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the, current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality. There is a very dark side to this lust for killing top carnivores. The first and easiest grizzlies to be killed will be the roadside bears of Yellowstone and Grand Teton national parks. These loved and most photographed bears have little fear of humans since wildlife is protected in national parks. Thousands of park visitors have thrilled over viewing grizzly bear families (mother bears with young are more frequent along roads). One famous mother grizzly, known as number 399, is now in hibernation but frequents roadways in Grand Teton. A Jackson Hole, Wyoming, outfitter has reportedly pledged that this is the first bear he would target: "because he hates federal government, bear-loving environmentalists and the Endangered Species Act," according to journalist Todd Wilkinson. Last year, during the furor over the killing of Cecil the African lion, Yellowstone park officials decided to kill another famous mother bear who had fatally mauled a photographer, and send her cubs to live in a zoo. The American public unloaded a ton of fury on the park's superintendent. There is more: Delisting the Yellowstone grizzlies will make them very easy for anyone to kill; without federal protection, their bearish lives will be made expendable. Witness how the only agreement by the three states is how they divide the spoils of Yellowstone into three piles of dead bears. The unmistakable message is that the only measure of value of these magnificent animals is as a head on the wall or a rug on the floor. Of the reported 59 grizzlies killed in 2015, more than half were	FWS-R6-ES-2016-0042-0779	

We do not know how the current population of grizzlies will respond to their recent increase in human caused mortality, reduction in white bark pine nuts, reduction in Yellowstone Cutthroat, and reduction in the elk population.	1002	1003	1005				Factor E	I am against removing protection from grizzlies in the Yellowstone ecosystem by de-listing. We do not know how the current population of grizzlies will respond to their recent increase in human caused mortality, reduction in white bark pine nuts, reduction in Yellowstone Cutthroat, and reduction in the elk population. We know that if de-listed, Wyoming, Montana, and likely Idaho will enable trophy hunting of the grizzly. People taking out the dominate males from a stressed population will be bad for the species. The bears need at least five more years of protection to determine how the population will fare before we start hunting them. I am a Westerner, living in Idaho for over 36 years.	FWS-R6-ES-2016-0042-1083	
Grizzly food sources are in decline, cub mortality rate is high, there is no connectivity between GYE and NCD ecosystems, human-caused mortality rate is high.	1001	1000					Factor E	See Attached Attachments Cardori Zachary	FWS-R6-ES-2016-0042-1139	
Although numbers have begun to increase in recent years we are experiencing rapid climate and habitat change worldwide in which we have no idea how the Grizzly population will adapt to. It is inhumane to consider allowing external and controllable pressures to reduce the rebounding population of Grizzlies when they face pressures from the rapidly changing natural environment that we and they have no control over and that they are reliant upon.	1006						Factor E	The notion of delisting Grizzlies or any other threatened species is appalling in this age of environmental instability. Although numbers have begun to increase in recent years we are experiencing rapid climate and habitat change worldwide in which we have no idea how the Grizzly population will adapt to. It is inhumane to consider allowing external and controllable pressures to reduce the rebounding population of Grizzlies when they face pressures from the rapidly changing natural environment that we and they have no control over and that they are reliant upon. Do not condemn the GYA Grizzlies to the annals of history, let them thrive for future generations to enjoy seeing in their natural habitat and range.	FWS-R6-ES-2016-0042-5373	

I disagree with the notion of separating the Greater Yellowstone Population of bears from the other populations in the northern Rockies, and delisting only the GYE bear population. Grizzly recovery goals should be based on a larger ecosystem. Given the ecological disruptions that we know will occur on an increasing basis due to climate change, successful grizzly recovery will depend on connecting existing populations, and managing them as a whole.	1001	1006					Factor E	See Attached Attachments Weiner Gary	FWS-R6-ES-2016-0042-1229	
Whitebark pine is being killed off due to climate change, which removes a major food source for the grizzlies. A report by the Interagency Grizzly Bear Study Team that concludes that whitebark pine is not essential to the bears is conceptually flawed, with a bias towards a political agenda, and flatly contradicts an overwhelming body of earlier government research which demonstrated the importance of whitebark pine to the grizzly population. Other major food sources of the grizzly are stressed - cutthroat trout by invasives, and cutworm moths by pesticide use. The decrease in availability of food sources will result in healthier bears, greater mortality, and decreased fertility, all of which will lead to a decline in the bear population.	1003	1002	1006	1004			Factor E	I strongly oppose the delisting of Grizzly Bears in the Greater Yellowstone Ecosystem. FWS claims that it will be involved in management of and protecting the grizzly population after delisting. However, Montana has already decided to allow trophy hunting for grizzlies. Idaho, Montana, and Wyoming have shown themselves to be hostile towards predators, with little attempt to prosecute poaching, and only minor penalties for poachers who are prosecuted. You claim that there are enough grizzlies (700) in the Greater Yellowstone Ecosystem to delist them. How was the number of 700 arrived at, and by whom? Dr. David Mattson, who has studied grizzlies and mountain lions for the last 35 years, 15 of which were intensive field study in Yellowstone, disagrees with this assessment. Even if your estimate is accurate, the population is still in danger. Whitebark pine is being killed off due to climate change, which removes a major food source for the grizzlies. A report by the Interagency Grizzly Bear Study Team that concludes that whitebark pine is not essential to the bears is conceptually flawed, with a bias towards a political agenda, and flatly contradicts an overwhelming body of earlier government research which demonstrated the importance of whitebark pine to the grizzly population. Other major food sources of the grizzly are stressed - cutthroat trout by invasives, and cutworm moths by pesticide use. The decrease in availability of food sources will result in healthier bears, greater mortality, and decreased fertility, all of which will lead to a decline in the bear population. Coming back from any population decline will be difficult for grizzlies, since the females only give birth every 3 years. Lastly, regarding claims that the Greater Yellowstone Grizzly has recovered enough range to be delisted - Under the Endangered Species Act, species must be treated as a whole. The Yellowstone Ecosystem population is no different biologically than other grizzlies in the Northern Continental Divide region. Therefore, you have no legal authority to delist the grizzly in the Greater Yellowstone Ecosystem. Please remember that the wildlife of this nation does not belong to the state Fish and Game Departments, nor to special interest groups such as hunters and outfitters, but to the people of this nation. Thank you for your consideration of my opinion.	FWS-R6-ES-2016-0042-5377	
I oppose allowing trophy hunting of bears. This type of hunting has far more to do with economic opportunism than bear management. The states of MT, WY and ID have shown a strong predilection for hunting, almost as a philosophical goal, rather than necessarily the best management option. I do not support managing the GYE bear population for a target population of 674 bears, and encouraging the discretionary harvest (hunting) of independent bears to maintain this population target. Rather, the GYE grizzly population should be allowed to expand, if it can. (And I am not at all convinced that the GYE population will continue to increase, given known disruptions to its primary food sources, and our lack of knowledge about the sustainability of whatever they are currently using as alternatives.) It would be advantageous for recovery to encourage independent males and females to leave the GYE area and connect with adjacent populations, improving genetic diversity and expanding the overall geographic extent of the species.	1000	1001					Factor E	See Attached Attachments Weiner Gary	FWS-R6-ES-2016-0042-1229	

As a long time resident of the west, I want to see the bear continue to be on the ESL in the GYE. That is until their numbers there are around 1000 in that ecosystem. They need to have some DNA diversity. Also with global warming killing white bark pine, problems with yellowstone cutthroat trout numbers being devastated and moths not being as prolific (being killed off by pesticides) . I think it is reasonable and important to ensure the existence of this key species in the lower 48.	1001	1003	1002	1003		Factor E	The grizzly bear is a key and unique species of north america. I have lived in Cook City, Silvergate, Gardiner and West Yellowstone (all in MT) over many years. I learned to love and respect the bear. I lived in WY for 30 years and now in ID for 7. I think the numbers are still low (700 out 300,000) and the intentions of many in WY, MT and ID in the Greater Yellowstone Ecosystem are to kill as many bears as possible as soon as they are off the Endangered Species List. I worked in YNP doing hiking and camping safety events teaching people how to be careful in bear country. Teaching about bear spray and helping communities get bear proof trash containers. I see this delisting the grizzly bear as a sad event. I remember when Frank and John Craighead warned the F&WS and the Park Service that changing to much all at once would cause great harm to the bear. Which is why they ended up on the ESL. I think the agencies are being pressured by politics and short sighted politicians. As a long time resident of the west, I want to see the bear continue to be on the ESL in the GYE. That is until their numbers there are around 1000 in that ecosystem. They need to have some DNA diversity. Also with global warming killing white bark pine, problems with yellowstone cutthroat trout numbers being devastated and moths not being as prolific (being killed off by pesticides) . I think it is reasonable and important to ensure the existence of this key species in the lower 48. I thank you for your time and attention.	FWS-R6-ES-2016-0042-1268	
They are genetically isolated from other grizzly populations, a danger to their survival.	1001					Factor E	See Attached Attachments Dickinson Sarah	FWS-R6-ES-2016-0042-1349	
I DO NOT SUPPORT DELISTING the grizzly or the Yellowstone Draft Plan due to the lack of protection offered to the great Grizzly Bear. These bears need to travel to find mates. How can this species not only survive, but thrive, when their gene pool is so isolated? They need to be able to travel to find mates who offer gene diversity without the threat of hunters, habitat loss, or disgruntled ranchers. These bears should be able to expand their territory to sustain their species without human threat.	1001					Factor E	I am a proud American and value what makes this country unique, including our land and wildlife. After hearing of the debate about Grizzly Bear delisting, not only was I disappointed, but angry. Angry because, once again, it seems those who are paid by American citizens to manage and protect our countries treasures are bowing to some wealthy political lobbyists. We have torn down forests, paved over habitat, wiped out entire species, and built our capitalist shrines throughout this nation. It is past time to reign in our greed and arrogance. It is time to take pride in this country's life. Delisting will only bring hunts... And hunts contributed to the grizzly numbers dropping to less than 200 in the 70s. I DO NOT SUPPORT DELISTING the grizzly or the Yellowstone Draft Plan due to the lack of protection offered to the great Grizzly Bear. These bears need to travel to find mates. How can this species not only survive, but thrive, when their gene pool is so isolated? They need to be able to travel to find mates who offer gene diversity without the threat of hunters, habitat loss, or disgruntled ranchers. These bears should be able to expand their territory to sustain their species without human threat. These ranchers need to man up... Stop blaming the bear and wolves for trying to survive on what little land we've left for them. Ranchers are the intruders. They need to take more precautions before taking out their rifles on my land. This is PUBLIC LAND PAID FOR BY TAXPAYERS and most of us want the wildlife to stay in tact. Also, the plan talks about waiting for THREE years of lowered bear population before action is taken. With what I know about the difficult and slow reproductive rates of these bears, I consider THREE years too long without a response by a management team. After all, it took grizzly bears 40 years to raise their numbers to only about 700. While the plan does not mention an intended grizzly hunt, I can only guess it's impending. I do not support a hunt at this time especially in or AROUND Yellowstone. And definitely not in any area that interrupts the bears' passage to find mates. And if you allow hunts, how will hunters differentiate between males and mothers with cubs that depend on her for survival? Or will they even care? Starving, motherless cubs is not acceptable. This plan is no plan without addressing these points. Please consider my words while remembering the dire state of the worlds wildlife. Be part of the solution. With deep concern, Ang Sutton	FWS-R6-ES-2016-0042-1373	

There are not adequate existing regulatory mechanisms taking place outside the ESA. For example, the state of Wyoming's plan states that they will not let the demographic of the bears drop below 500 individuals. This would mean the population could potentially lose at least 30% of its current members, not including the estimates that the population doubles every two years. That substantially decreases not only the current and future population but the genetic diversity as well. The goal of the Endangered Species Act is to recover individuals to a level where they can sustain their population and increase in numbers for the futures. The current proposal to delist encourages the reduction of the population to a precarious level	1001					Factor E	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	
Climate change will have a bigger and bigger impact on animals. Already they have lost 2 of their main food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides.	1006	1002	1003	1004		Factor E	I am opposed to the delisting of Grizzly bears. Climate change will have a bigger and bigger impact on animals. Already they have lost 2 of their main food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides. But than some scientists say we only have 100 years anyway before we are doomed.	FWS-R6-ES-2016-0042-1435	
Their population is at risk as it isolated from other grizzly bear populations. There are no plans for connecting the two populations, which is key to long term survival of the species.	1001					Factor E	I oppose the delisting of Greater Yellowstone Ecosystem grizzly bears. Their population is at risk as it isolated from other grizzly bear populations. There are no plans for connecting the two populations, which is key to long term survival of the species. Further, grizzly bears are one of the slowest reproducing mammals in North America. What would happen if a number of bears died due to unforeseen events in a single year? The population would be in jeopardy. Finally, state management of the bears is a risk in and of itself. We have seen what happened when these predator-unfriendly states "managed" the wolves. The populations were decimated. Wyoming's so much so that a federal judge had to re-list Wyoming wolves. There are no assurances that things would be any different with management of grizzlies. Indeed, the discussion between the states so far has indicated that they plan a trophy hunting season and that bears dispersing to connect with other populations would be among those first to be killed. As if that weren't enough, a majority of Americans oppose the delisting of Yellowstone area grizzly bears. These bears are icons of the American wilderness as well as a huge tourism draw to the region. They should be protected, not delisted.	FWS-R6-ES-2016-0042-1455	

Federal delisting and subsequent hunting, as well as the imminent extinction of a key food source, due to global warming, spell disaster for the iconic grizzly bears of the Greater Yellowstone Ecosystem.	1006	1000				Factor E	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530	
Grizzly bears feel the effects of climate change in more ways than just an untimely end to hibernation¼ as the whitebark pine tree succumbs to the effects of global warming, the grizzlies primary food source (nuts from the tree) is rapidly disappearing with the tree facing possible extinction from the park (80 percent of the stands are dead or dying). Once common in harsh mountain environments, the tree is being pushed out of its subÅ-alpine habitat thanks to a warming climate, causing the treeline to migrate to higher elevations.	1006	1002				Factor E	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530	
The whitebark pine is also a victim of the pine beetle, the insect responsible for the destruction of hundreds of thousands of acres of forests across the West. Pine bark larvae have higher survival rates in warmer winters and the infestation, at this stage, seems unstoppable (In 2011 the U.S. Fish and Wildlife Service determined the tree warrants protection under the Endangered Species Act). In the Yellowstone park area the tree is nearly gone: ÆœNo amount of science or management will bring the trees back in our lifetime.Æœ	1002	1006				Factor E	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530	

As if we hadn't learned our lesson from prior grizzly strategies, we find ourselves at the crossroads of further endangering the very existence of our beloved Grizzlies by delisting a species struggling to survive in our ever-changing and warming world. Further complicating the situation (as if it wasn't bad enough, already) the Yellowstone grizzly bear population suffers from increasingly fragmented and disconnected habitats	1006	1001				Factor E	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530	
Without wildlife corridors, migration routes, and other connected habitat, wildlife like grizzlies cannot continue to reproduce, find food, disperse, and maintain enough diversity in their populations to survive into the future.	1001	1000				Factor E	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530	
The Yellowstone Atlas produced by an ecology team at the U. of Oregon, Eugene highlights the need for spill over areas for animals and plants of Yellowstone. The concept of a "Greater Yellowstone Ecosystem" is established & increasingly serious and necessary due to the natural ebb and flow of population due to climate and natural habitat changes, but is critical due to the spiraling human development issues of which we've seen only the beginning. Increasing fires, temperature changes and habitat changes (water, noise, human intrusion upsetting population, pollution, fish and stream changes, corridor impediment for not only genetic diversity but movement to access habitat and food in times of stress all affect the grizzly bear and its ecosystem.	1001	1006	1000			Factor E	See Attached Attachments Trygstad Ellen	FWS-R6-ES-2016-0042-1607	

A recent Harvard study on stress and population has highlighted that the scientific community has greatly underestimated the needed population numbers and dispersal for large mammal survival, critically important in light of the speed with which climate change is assaulting habitat.	1006	1001				Factor E	See Attached Attachments Trygstad Ellen	FWS-R6-ES-2016-0042-1607	
Grizzly Bear conservation has been dynamic and many goals were reached including raising population numbers. However, just because the population has reached a certain set number does not mean they lack vulnerabilities. One such vulnerability is climate change. The issue of climate change is addressed in the proposal with the conclusion of having little impact on the bears . Grizzly Bears used to range from Northern Canada to Northern Mexico, a vast expanse of land known to many as the "Spine of the Continent." However, Grizzly bears are also creatures of the cold and with the rise in global temperature, their comfortable habitat range will continually be expurgated Northward. Climate change has also decline snowfall in certain areas; snowfall is important to Grizzlies as they inhabit dens where snow is unlikely to melt in warmer temperatures. As noted in the proposal, many Grizzly Bear biologists within this region do not believe climate change will affect the species. Though resilient and hardy creatures, by taking them off the Endangered and Threatened Species list, we are asking them to adapt to climate change as a whole species.	1006	1001				Factor E	Keep Grizzly bears on the Endangered and Threatened Species List As well as the Grizzly Bear population has recuperated within the past few years, these numbers alone cannot guarantee aggregate protection of the species. Although many factors were taken into consideration in the proposal, two main aspects of conservation biology were forgotten: 1) the ecosystem is a synchronized whole; protecting bears would protect other species as well, especially because bears are an umbrella species to their habitats and 2) all conservation methods, though pragmatic, have no definite outcome. Grizzly Bear conservation has been dynamic and many goals were reached including raising population numbers. However, just because the population has reached a certain set number does not mean they lack vulnerabilities. One such vulnerability is climate change. The issue of climate change is addressed in the proposal with the conclusion of having little impact on the bears . Grizzly Bears used to range from Northern Canada to Northern Mexico, a vast expanse of land known to many as the "Spine of the Continent." However, Grizzly bears are also creatures of the cold and with the rise in global temperature, their comfortable habitat range will continually be expurgated Northward. Climate change has also decline snowfall in certain areas; snowfall is important to Grizzlies as they inhabit dens where snow is unlikely to melt in warmer temperatures. As noted in the proposal, many Grizzly Bear biologists within this region do not believe climate change will affect the species. Though resilient and hardy creatures, by taking them off the Endangered and Threatened Species list, we are asking them to adapt to climate change as a whole species. As noted before, Grizzly Bears are known as a keystone and umbrella species of their systematic habitats. (Berger et al 2001) Just like the Grey Wolves in Yellowstone, even their presence affects many more species including both animal and plant life forms. Using the wolves as an example in Yellowstone, when the wolves were eliminated the whole ecosystem seemed to be dying alongside. Without wolves to control the Elk populations, the Elk overpopulated and ate or trampled many plant species. Without plant species, all the other mini-ecosystems such as the riverbanks were affected negatively as well. Though bear numbers are stable at the moment, they are faced with habitual vulnerabilities such as fragmentation and poaching. As the country develops, more and more land is urbanized and deforestation is rampant. Since the founding of our country, 90% of virgin forest has been cleared away due to human activities. (UMich) More and more roadways are built to convenience the lives of humans at the cost of roaming species. Habitat fragmentation is a somber issue often overlooked; fragmentation often leads to reduction of species richness, inbreeding, and loss of sustainability of the habitat for the animal itself. (Fahrig 2003) The concept of limited poaching is introduced especially if for self defense. However, bears are not harmful creatures and many methods can be implemented to prevent these creatures from attacking the population or the properties. The Habitat Based Recovery Criteria listed within the recovery planning are not backed with much scientific evidence; instead the bears are described as "opportunistic creatures" (USF&W) As well as the bears are doing, they are not at the same level as historic numbers. Though I understand the change within the country over time due to large scale development such as the building of roads	FWS-R6-ES-2016-0042-1670	
The reduction of whitebark pine seeds could be problematic as well. Post hibernation, bears require all the nutrition possible to gain their fat reserves back. As documented these whitebark pine seeds be over consumed by the bear population. Adverse effects could be an increase in death for other wild animals or possible human deaths. There are thousands of visitors to Yellowstone every day, and there may be more human-bear interactions.	1002					Factor E	The Greater Yellowstone area should remove the grizzly bear from the federal endangered species list. According to the data shown in graphs below it is perfectly reasonable for this species to no longer require federal attention and relinquish their management to the respective states. I believe we should use proper justification of data shown in this proposed rule to influence federal and state decisions, and not let the morals of hunting that many self-described conservationists influence decisions. The grizzly bears population has hit the species carrying capacity for that area according to figure 1. As hard as many find it to allow hunting of an animal, it is wise to allow the regulated ability for locals and visitors to minimally hunt this animal increasing the maximum benefits to costs for this resource. If the bear is not allowed to be hunted there is room for future increased danger from the predator since there could be more potentially harmful human encounters since the bears will venture further off national park grounds. Reducing the numbers of bears that leave the national park ground could keep unsafe encounters to a minimum. It's important to keep in mind the surrounding ecology that would be affected by the capped capacity to the bear population. As many other commenters continually emphasize the value of the bear population, they do not take into account the complexity of wildlife habitats. Other wildlife populations will be affected by more bears. More bison, elk and moose have become part of their diet. Does this mean that the conservationist commenters value the life of a bear more than the life of other animals that could be opportunistically eaten by the bears given the chance? The reduction of whitebark pine seeds could be problematic as well. Post hibernation, bears require all the nutrition possible to gain their fat reserves back. As documented these whitebark pine seeds be over consumed by the bear population. Adverse effects could be an increase in death for other wild animals or possible human deaths. There are thousands of visitors to Yellowstone every day, and there may be more human-bear interactions. As someone who values natural habitats and enjoys visiting our nation's largest national park it is our duty to now relinquish the responsibilities to manage these valued animals to their respective states. Let the coordination between fish and wildlife divisions keep the bear at a healthy population to continue to prosper, but not at such a high population that they can do other unnecessary harm to other parts of the forests ecology.	FWS-R6-ES-2016-0042-1740	

the FWS claim that 'grizzlies have reached their "carrying capacity" in Yellowstone and the ecosystem will not support any additional bears' is extremely dubious. The the bears' dispersal and increasing territory are likely because they are seeking additional food such as ungulates, something that puts them in direct conflict with local hunters and ranchers. This is due to the decline in the grizzlies' main food sources (such as whitebark pine nuts, which is under threat from invasive mountain pine beetles)--how will the bears' food will fare in the future -- how do we know that their population growth has truly stabilized.	1005	1002					Factor E	I strongly OPPOSE the proposed removal of Grizzly bears from the Endangered list. --recent reports of the killing of Scarface (tagged as Bear 211) tells us about the future that faces Grizzlies once they are delisted. Even while supposedly protected under the ESA, Scarface and the other 61 grizzlies in 2015 were killed. Delisting them would cause a bloodbath. --Why did it take 6 months to report Scarface's murder? It seems like it was done to fit the needs of the Feds' and states' delisting and trophy hunting narrative. -- the proposal is not based on the best available science. It is premature to change the bears' protected status -- delisting Grizzlies will immediately open them to Trophy Hunting. This move is nothing but a giveaway to rich, white hunters. -- the move is opposed by local Indian tribes 'GOAL Tribal, an association of Native American tribes and groups' -- the FWS claim that 'grizzlies have reached their "carrying capacity" in Yellowstone and the ecosystem will not support any additional bears' is extremely dubious. The the bears' dispersal and increasing territory are likely because they are seeking additional food such as ungulates, something that puts them in direct conflict with local hunters and ranchers. This is due to the decline in the grizzlies' main food sources (such as whitebark pine nuts, which is under threat from invasive mountain pine beetles) --how will the bears' food will fare in the future -- how do we know that their population growth has truly stabilized. both avoid points indicate that proposal is extremely premature	FWS-R6-ES-2016-0042-1759	
In addition, these animals are still struggling to keep their population at healthy levels, and the recent changes in our climate cycles include such as the persistence of insects through the winter months that would have died off in the past.and the migration into the area of invasive species. The food chain that sustains the grizzlies is being affected.	1006	1000					Factor E	Caving in to the trophy hunters will likely result in fewer visits to our great national parks, as visitors who want to see the iconic grizzly bear might just as well go somewhere else if the grizzly population of wilderness areas in Western states is threatened. Take into consideration all the businesses that rely on this tourism - the camping and boating concessions, the hotel industry. In addition, these animals are still struggling to keep their population at healthy levels, and the recent changes in our climate cycles include such as the persistence of insects through the winter months that would have died off in the past.and the migration into the area of invasive species. The food chain that sustains the grizzlies is being affected. Opening up a season on grizzly kills is not in the best interests of this nation.	FWS-R6-ES-2016-0042-1794	
I OPPOSE DELISTING!! Here is why and the science behind it: THE USFWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival.The reality: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. The USFWS claims there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." More science to come.	1002	1003	1001				Factor E	I OPPOSE DELISTING!! Here is why and the science behind it: THE USFWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. The USFWS claims there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." More science to come.	FWS-R6-ES-2016-0042-1878	

The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone.	1000						Factor E	I OPPOSE DELISTING!! Here is why and the science behind it: THE USFWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. The USFWS claims there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." More science to come.	FWS-R6-ES-2016-0042-1878	
We have spent millions of dollars to restore grizzly bears to GYE and we must continue these conservation efforts in perpetuity, preserving the important roles they play in maintaining healthy and diverse environments. Rather than delisting grizzlies and opening up hunting immediately - our efforts should be focused on connecting this isolated genetic population to grizzlies in the North.	1001						Factor E	As trained scientist, physician and someone that has been following the science related to Grizzlies, I'm opposed to delisting the GYE Grizzly bears because the plan is inadequate and does not account for the many challenges this population will continue to face. Grizzlies are a keystone species of our national parks and wild places, making the U.S Fish and Wildlife Service's proposal to remove the Greater Yellowstone Ecosystem grizzly from the Endangered Species List a serious concern. The post-delisting management of bears must be based on sound science and provide adequate protections to ensure the long-term survival of this iconic population. Frustratingly, this draft rule released for public review is incomplete, it fails to provide details that will impact bears in our national parks. It also relies on outdated state plans, one a decade old, for grizzly management. The draft rule is missing critical information to outline how state agencies will partner with the National Park Service, in addressing bear management on lands adjacent to national parks. It is extremely concerning that this draft rule fails to address hunting inside of the John D. Rockefeller Parkway, key habitat connecting bears between Grand Teton and Yellowstone National Parks. Under the current proposal, hunting could occur on lands directly adjacent to national parks as well as key habitat that could link Yellowstone's grizzly bears to grizzlies from GNP. We have spent millions of dollars to restore grizzly bears to GYE and we must continue these conservation efforts in perpetuity, preserving the important roles they play in maintaining healthy and diverse environments. Rather than delisting grizzlies and opening up hunting immediately - our efforts should be focused on connecting this isolated genetic population to grizzlies in the North.	FWS-R6-ES-2016-0042-1910	
The delisting of the Yelloestone grizzlies would be a devastating mistake for many reasons. To preserve and enhance this isolated gene pool good science should provide guidance to implement a plan to provide interaction with other bear populations. This would also allow for a greater range for food forage. Grizzlies have a slow rate of reproduction and any females lost would tip the scales unfavorably. A certain elements in some Western States is all too eager to decimate their bear and wolf populations. This hostility displaces scientific studies and any respect for their wildlife and the will of the people throughout the United States.	1001	1000					Factor E	The delisting of the Yelloestone grizzlies would be a devastating mistake for many reasons. To preserve and enhance this isolated gene pool good science should provide guidance to implement a plan to provide interaction with other bear populations. This would also allow for a greater range for food forage. Grizzlies have a slow rate of reproduction and any females lost would tip the scales unfavorably. A certain elements in some Western States is all too eager to decimate their bear and wolf populations. This hostility displaces scientific studies and any respect for their wildlife and the will of the people throughout the United States.	FWS-R6-ES-2016-0042-1926	

USFWS is going to have a big PR mess on their hands if delisting and hunting takes place and so will the US Government.	1007						Factor E	I OPPOSE delisting and here is why. Nothing has changed from what happened the last time USFWS wanted to delist. In fact, climate change has worsened, people's perspective about trophy hunting is abhorrent. The case of Bear #211 also known as Scarface killed by a so called elk hunter will be the fate of the bears. #211 did not see well, hear well, was arthritic and had 2 teeth. He should have died in his den by natural causes not by a bullet. USFWS is going to have a big PR mess on their hands if delisting and hunting takes place and so will the US Government. In 1997, the US Fish and Wildlife Service (FWS) released a "Habitat Based Criteria" plan, designed to establish habitat goals for recovery in response to a federal court ruling in 1995. Of the 15,750 comments submitted to FWS, over 97% expressed support for strengthening habitat standards. In 2000, the FWS released the Draft Conservation Strategy, directing the implementation of the Habitat Based Criteria. The FWS received 16,794 comments, of which over 99% supported strengthening the plan. In 2001, the state of Wyoming released its plan for management of the grizzly after delisting. Over 8,000 comments were submitted, more than have been received for any other wildlife plan in Wyoming history, "shattering the record," according to Wyoming Game and Fish Information Officer Larry Kruckenberg. Over 95% of the comments were in support of strengthening grizzly protections and expanding grizzly range beyond the FWS recovery zone line. As part of the Wyoming planning effort, a 2001 telephone survey of Wyoming citizens was conducted inquiring into peoples' attitudes towards grizzlies. This survey was solicited by Wyoming Game and Fish. Of the 1500 citizens interviewed, 87% agreed that grizzlies are an important component of their ecosystem, and 74% agreed that grizzlies are a great benefit to Wyoming. And a majority of respondents supported a plan that would allow grizzlies to expand into all suitable habitats in Wyoming (66%), including the Wyoming Range (73%) and Wind River Mountains (67%). In 2001, the state of Idaho also released its draft plan for managing grizzlies after delisting. Over 80% of these comments supported stronger protections for the grizzly.	FWS-R6-ES-2016-0042-1961	Public attitudes towards delisting
The population will be put in jeopardy as they will be at the mercy of hunters and improper state management. We do not even know at this time what severe effects may happen to the Grizzly bear population due to global warming.	1006						Factor E	See Attached Attachments Davison Dennis	FWS-R6-ES-2016-0042-2007	
If the numbers are lowered to the point where genetic diversity is compromised, then you will have issues with the animals health.	1001						Factor E	As a resident of California, and someone who wishes she had seen a grizzly in the wild, here in California, I beg you to protect these beautiful animals. California has a grizzly on it's flag because they once roamed this state, wild and free. They are now extinct in this state. They only live in a few places. Trophy hunting is appalling to me. It goes against everything I believe in. Wild animals deserve to be wild. To hunt an animal, simply for it's hide or it's head is beyond comprehension. Especially when there are so few left in the wild. If the numbers are lowered to the point where genetic diversity is compromised, then you will have issues with the animals health. The wolves were hunted to extinction in Yellowstone and so many other animals began to over populate that the wolves were re-introduced. Now they are being hunted as well. If we do not look at the historical evidence, we are a doomed planet. The wild horses are being hunted to make room for cattle. The wolves are being hunted, to make room for cattle. The bison are killed because of the remote possibility they might make the cattle sick (not scientifically proven) but in reality, it's because they might eat grass the cattle would eat. As an American and an animal lover, I want my voice heard. Please take a look at the situation with an eye to the past. California has no more grizzlies. I had to go to Alaska to see one in the wild. It took my breath away. Such a magnificent animal. The bison in Yellowstone took my breath away when I saw them, as did the one lone wolf I saw. Do not remove the grizzly bear from the list of endangered species. They are not only representative of this great land but they are an important part of the food chain and the ecosystem. People need to learn how to behave around these animals so we can all remain safe, including the animals.	FWS-R6-ES-2016-0042-2239	

David Mattson also disagrees with the USFWS's contention that the number of bears has reached the [Greater Yellowstone Ecosystem's] carrying capacity. To the contrary, Mr. Mattson argues that carrying capacity has in fact declined. He stated, "because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millennial drought which is promising more of the same to come, that we've seen a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods". He further added, "while we have seen an increase in the distribution of the bear population, probably by 30 to 40% since the early 2000s, at the same time, we haven't seen any increase in the population".	1002	1003	1005				Factor E	Biologist: Yellowstone Grizzlies Can't Afford Any Increase In Mortality This was the response David Mattson, a retired bear biologist and ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone gave when asked whether the Yellowstone Grizzly population is big enough that it could sustain any mortality from sport hunting? David Mattson also disagrees with the USFWS's contention that the number of bears has reached the [Greater Yellowstone Ecosystem's] carrying capacity. To the contrary, Mr. Mattson argues that carrying capacity has in fact declined. He stated, "because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millennial drought which is promising more of the same to come, that we've seen a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods". He further added, "while we have seen an increase in the distribution of the bear population, probably by 30 to 40% since the early 2000s, at the same time, we haven't seen any increase in the population". Because the Grizzly population is becoming increasingly vulnerable, and because state wildlife management is such a poor alternative, and in dire need of reform, Mr. Mattson strongly opposes delisting. In light of these statistics, the decision to remove Greater Yellowstone Grizzlies from federal protection under the Endangered Species Act would be disastrous. As a taxpayer, as a frequent visitor to Yellowstone and as a great appreciator of the Grizzly Bears and their impact not only on the environment but our lives, I respectfully ask that you do not delist them.	FWS-R6-ES-2016-0042-2215	
Given the demonstrable and growing adverse effects of global warming on food sources bears rely upon, there is no justification for concluding that grizzly numbers have recovered sufficiently to remove this ecosystem's population from the protections of the ESA.	1006						Factor E	Delisting Yellowstone Grizzlies in 2016 is an ill-advised and premature proposal. There has not been enough preparation to secure adequate habitat protection for them, and I am appalled that FWS continually caves in to pressure from ranching interests and adjacent State governments to facilitate hunting and culling of wildlife populations. Given the demonstrable and growing adverse effects of global warming on food sources bears rely upon, there is no justification for concluding that grizzly numbers have recovered sufficiently to remove this ecosystem's population from the protections of the ESA. Grizzlies in the lower forty-eight states have a special significance for millions of American citizens. Their continued existence (along with wolves and cougars) as the apex predators of the increasingly constricted natural wildlife areas is extraordinarily important to most of us. Given the fact that FWS has already screwed up the reintroduction of buffalo and wolves to the Yellowstone ecosystem, this proposed delisting should be postponed for at least another five years.	FWS-R6-ES-2016-0042-2400	
The grizzly bears in the Yellowstone area had been removed from the list in 2007 but in 2009 a 9th Circuit federal judge ordered that they be put back on, citing the decline of the whitebark pine tree, whose pine cone nuts were seen as a critical part of the grizzly diet. However, the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers.	1002						Factor E	The facts are very clear. Grizzly bears need to be delisted. Please do so According to Yellowstone National Park, over the last 40 years the grizzly population there has grown from 136 to a stable population of somewhere between 674 and 839 The recovery population goal was 500 and was actually met in 1999. The grizzly bears in the Yellowstone area had been removed from the list in 2007 but in 2009 a 9th Circuit federal judge ordered that they be put back on, citing the decline of the whitebark pine tree, whose pine cone nuts were seen as a critical part of the grizzly diet. However, the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered.. Fact: Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said the reason the population is leveling out is that bear density has reached the carrying capacity for the range. Fact: the number of female grizzlies with cubs in the Yellowstone ecosystem was the highest ever recorded ever counted in 2013.	FWS-R6-ES-2016-0042-2508	

Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, seasonable resilience, and availability throughout the habitat. A	1002	1003				Factor E	De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, seasonable resilience, and availability throughout the habitat. The Greater Yellowstone Ecosystem (GYE) population is much smaller than the Northern Range bears, but the Northern population is not being considered for de-listing. The GYE population is being threatened because industrial, energy, and development companies have been applying tremendous political pressure through lobbying and heavy-handed public relations campaigns (promising jobs, dismissing science; the usual stuff). The GYE grizzlies are an "island population". This means that they are adapted to live and thrive within a specific geographic range. Substantial threats or changes to that habitat would likely pressure the bears to try and relocate, but they cannot successfully do so. The Greater Yellowstone Ecosystem is the environment to which they have adapted over eons. There is not another environment to which they could relocate and remain a viable species. Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability. US Fish and Wildlife data regarding the GYE grizzly population is suspect at best. For years, most counts of the population were in the 200 to 400 range. When de-listing was first proposed in 2007, the number suddenly shot up to 700. The methods used to arrive at that number involve a great deal of extrapolation from an extremely small sample of verified sightings. Rather than relying on US FWS data (pressured by lobbyists and hostile legislators), the public should demand research by independent organizations like The Ecological Society of America or the National Research Council. Current population estimates are untrustworthy, and the field needs good peer-reviewed analysis by objective scientists. If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it.	FWS-R6-ES-2016-0042-2542	
The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals.	1001					Factor E	There are many compelling reasons why removing ESA protections of the grizzly is premature at best and potentially devastating to the bears recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. Delisting the grizzly will also re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival.	FWS-R6-ES-2016-0042-2744	
While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue.	1005	1003	1002	1006		Factor E	quoting Larry Fahn, " . . . there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. end quote I look forward to your response,	FWS-R6-ES-2016-0042-2750	

Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated at least one food source. USFWS needs to consider how climate change will impact bears' food sources and behavior. USFWS failed to do this with wolverines and had to have a court order USFWS to consider climate change in wolverine listing.	1006					Factor E	I object to delisting the grizzly bear from the Endangered Species Act. Barring that, the delisting does not need to be accompanied by the legalization of trophy hunting for the following reasons: AS WE SAW WITH SCARFACE, BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. In 2015, record number of Yellowstone area grizzly bears were killed despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. Additionally, there are ranchers right outside of Yellowstone (in MT) who are practicing wildlife sustainable ranching. Rather than give ranchers a license to kill, can't we first ask that they try these methods? The economic impact of grizzlies being road friendly in Yellowstone is huge. Once they start being hunted, they will become less road friendly and there will be fewer visitors to Yellowstone. IF HUNTING IS ALLOWED, THERE MUST BE BUFFER ZONES around national parks and a no-hunt zone in between Yellowstone and Grand Teton National Park, minimally, and up through the Tom Miner Basin area in Montana. CLIMATE CHANGE NEEDS TO BE CONSIDERED. Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated at least one food source. USFWS needs to consider how climate change will impact bears' food sources and behavior. USFWS failed to do this with wolverines and had to have a court order USFWS to consider climate change in wolverine listing. Additionally, we can't say that we are being environmentally responsible and kill off apex predators. The environment does not stop with the flora but is equally impacted by the fauna, particularly apex predators. MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The outcry over the killing of Cecil the Lion by many Americans will be repeated here. We cannot object to the killing of Cecil and then less than a year later sanctify the right of hunters to do the exact same thing in the U.S. STATE CONFLICTS OF INTEREST. The states have not shown that they can work together to manage their apex predator populations, and several officials of the surrounding states have indicated that they wish to eradicate apex predators from their areas. These creatures don't know where state lines begin and end, and some of the most natural habitats for grizzlies are in decidedly unfriendly states. I am disappointed that under a Democratic president that U.S. Fish & Wildlife would even consider delisting which is the equivalent of unprotected our wildlife. While I appreciate that delisting shows that there has been some success in restoring the grizzly population in the lower 48, the sad fact is that it comes with a license to trophy hunt which is unfair after years of protection, and to a barely sustainable population of animals. It is one thing to hunt elk or deer which thrive in abundance, and which are then consumed but trophy hunting is ultimately about the act of killing an apex predator for bragging rights that it can be done. The next is to enter the habitat, decimate, and stuffed and become a living	FWS-R6-ES-2016-0042-2859	
I just listened to Dr. Jane Goodall's message on why she opposes the delisting of grizzly bears. She raises facts that cannot be denied. It took over 40 years to grow their population from 150 to 700 bears. Once delisted in their quest for food because their main food sources are becoming scarcer so in stepping outside the park, they could be shot by a trophy hunter.	1000					Factor E	I just listened to Dr. Jane Goodall's message on why she opposes the delisting of grizzly bears. She raises facts that cannot be denied. It took over 40 years to grow their population from 150 to 700 bears. Once delisted in their quest for food because their main food sources are becoming scarcer so in stepping outside the park, they could be shot by a trophy hunter. There is a growing movement among sportsman's to start getting ready for grizzly bear hunting season. Just look at a Wyoming newspaper which sports an article with a pic of trophy hunter standing over a dead grizzly bear, declaring: "WOLF GRIZZ DELIST HUNT!" Hunting will orphan cubs and further decimate the population it took so long to build. Let the future of America's bears be secure. I know this is not the intent of the ESA but once delisted, animals like wolves and bears will be hunted. Do the right thing and keep Grizzly bears listed.	FWS-R6-ES-2016-0042-2924	
the unknown implications of climate change to this particular, isolated population of Grizzlies and, well, the inability for them to maintain a healthy genetic diversity due to their isolation and lack of connectivity to other populations up north. These two challenges are only going to get harder as land and food sources diminish in this region in the coming years.	1006	1001				Factor E	Although the hard work of many government agencies, scientists and conservationist has proven successful in the recovery of the Great Grizzly Bear, I am opposed to the proposed 2016 delisting of the iconic Greater Yellowstone Ecosystem Grizzly. Two main reasons, of a host of many, are the unknown implications of climate change to this particular, isolated population of Grizzlies and, well, the inability for them to maintain a healthy genetic diversity due to their isolation and lack of connectivity to other populations up north. These two challenges are only going to get harder as land and food sources diminish in this region in the coming years. I ask you to please consider my comment along with the thousands of others who oppose the delisting of the GYE Grizzly Bear.	FWS-R6-ES-2016-0042-2932	

First, the bears in this region are finding it increasingly difficult to find decent food resources throughout the year, on account of the effects of climate change, including phenological effects in high-elevation ecosystems, and the alarming growth in the numbers of the mountain pine beetle. Secondly, the genetic diversity of these bears is not great, so the sustainability of the population as a whole is unusually insecure; in light of that, so far from their having to deal with being left with fewer protections, their population should be strengthened by finding increased protections for reliable migration corridors connecting their region to regions to the north where other grizzlies are thriving. Thirdly, the bears' human environment was never good: human neighbors mistrust them at best, or actively go about seeking their removal; hunters covet collecting their body-parts as trophies; and local and state governments lack the political will to protect them, if they're even aware that they need protecting, and are at all sympathetic to that cause.	1006	1003	1001				Factor E	The proposal to remove the Yellowstone population of grizzly bears from status as endangered or threatened should not be recommended. The criteria that the agency have been using to make that recommendation are too narrow, so that the predicament of those bears is not fully appreciated. Three considerations seem to be outstanding. First, the bears in this region are finding it increasingly difficult to find decent food resources throughout the year, on account of the effects of climate change, including phenological effects in high-elevation ecosystems, and the alarming growth in the numbers of the mountain pine beetle. Secondly, the genetic diversity of these bears is not great, so the sustainability of the population as a whole is unusually insecure; in light of that, so far from their having to deal with being left with fewer protections, their population should be strengthened by finding increased protections for reliable migration corridors connecting their region to regions to the north where other grizzlies are thriving. Thirdly, the bears' human environment was never good: human neighbors mistrust them at best, or actively go about seeking their removal; hunters covet collecting their body-parts as trophies; and local and state governments lack the political will to protect them, if they're even aware that they need protecting, and are at all sympathetic to that cause. With regard to that third consideration more generally, it is not clear that the agency take full account of the human environment of wild animals when they assign them a regulatory survival status. It's very fair for us to think of the situation of another species of mistrusted predator in the midst of hostile human neighbors, the re-introduced "Mexican" gray wolves of southern Arizona and New Mexico, a situation that has been poorly regulated and maintained and as a result remains highly insecure, especially because of failures to appreciate the behavior of human beings. Those of us who hope for a strong and resilient population of grizzlies in the Yellowstone region, secure in their home and well-connected to other populations of their kind, dread the thought that they may be left in a predicament not unlike that of the Mexican wolves, with no human friends to help them secure their future, but rather having to rely on the tender mercies of neighbors who neither understand them nor sympathize with them nor even so much as like them.	FWS-R6-ES-2016-0042-2964	
Yellowstone grizzly bears need more protections not less right now, because their major staples, whitebark pine seeds and Yellowstone cutthroat trout, have declined precipitously.	1002	1003					Factor E	Grizzly bears are a slow-to-reproduce species one of the slowest in the animal kingdom. For instance, a mother grizzly bear spends up to four years raising and provisioning her young teaching them how to be bears. It's a huge investment of time, but if their mother gets killed by a trophy hunter, the her cubs will die from starvation or predation. Yellowstone grizzly bears should not be delisted because if they are, they will be subject to trophy hunting by the states of Wyoming, Montana and Idaho, which have already divided up the percentages of bears that can be hunted. Grizzly bear are a majestic species worth far more alive than dead. They bring tens of millions of dollars to the Northern Rockies states' economies each year. More than 4 million visitors went to Yellowstone and Grand Teton national parks in 2015 alone. Last year, Wyoming realized \$1.1 billion from national park-related revenues. This money helps a lot more people in these states. If someone shoots a grizzly bear, others cannot view or photograph it. Trophy hunters will stuff their dead bears, put their heads over their mantelpieces or turn them into bear skin rugs. That's just wrong. Wildlife belong to us all not just rich trophy hunters. Yellowstone grizzly bears need more protections not less right now, because their major staples, whitebark pine seeds and Yellowstone cutthroat trout, have declined precipitously. Please retain Yellowstone's grizzly bears on the Endangered Species List.	FWS-R6-ES-2016-0042-3002	
The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Å	1001						Factor E	Please do NOT delist the grizzlies. -Trophy hunting of the grizzly is not sound management of the species. There should be a three to five year moratorium on even considering hunting as a management tool. -- GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. -The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. - MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it.	FWS-R6-ES-2016-0042-3011	

This includes changes in land use as a result of the delisting including: hunting, change sin land uses, logging, increased accidental and poaching of bears, reduced penalties for illegal kills that could lead to greater bear deaths, reduced breeding due to bear removal, greater stress on the bears that reduces reproduction, killing of sows and related reduction in reproduction and cumulative effects of climate change and increased resource extraction as a result of a decision to delist.	1006						Factor E	Please, do not delist the Greater Yellowstone population of grizzlies from the Edangered Species list. The affects of this decision need to be analyzed for all likely foreseeable direct, indirect and cumulative effects on the species. This includes changes in land use as a result of the delisting including: hunting, change sin land uses, logging, increased accidental and poaching of bears, reduced penalties for illegal kills that could lead to greater bear deaths, reduced breeding due to bear removal, greater stress on the bears that reduces reproduction, killing of sows and related reduction in reproduction and cumulative effects of climate change and increased resource extraction as a result of a decision to delist. There needs to be a complete analysis of all effects as a result of the delisting. I urge you to no delist at this time, as there are many effects that need to evaluated and in the case of climate chage it is a likely foreseeable effect taht will result in reduced habitat quality and quantity, changes in habitat spatial arrangement that could affect the speices and reduced habitat quality due to greater resource extraction in areas that are now critical habitat for bear recovery. I will talk to you in any format, you can call me at 509 6303594 ir wrute ne at 200 S. kent Place East Wenatchee, Wa. 98802. Sincerely Kevin Kane	FWS-R6-ES-2016-0042-3036	
There needs to be a complete analysis of all effects as a result of the delisting. I urge you to no delist at this time, as there are many effects that need to evaluated and in the case of climate chage it is a likely foreseeable effect taht will result in reduced habitat quality and quantity, changes in habitat spatial arrangement that could affect the speices and reduced habitat quality due to greater resource extraction in areas that are now critical habitat for bear recovery.	1006						Factor E	Please, do not delist the Greater Yellowstone population of grizzlies from the Edangered Species list. The affects of this decision need to be analyzed for all likely foreseeable direct, indirect and cumulative effects on the species. This includes changes in land use as a result of the delisting including: hunting, change sin land uses, logging, increased accidental and poaching of bears, reduced penalties for illegal kills that could lead to greater bear deaths, reduced breeding due to bear removal, greater stress on the bears that reduces reproduction, killing of sows and related reduction in reproduction and cumulative effects of climate change and increased resource extraction as a result of a decision to delist. There needs to be a complete analysis of all effects as a result of the delisting. I urge you to no delist at this time, as there are many effects that need to evaluated and in the case of climate chage it is a likely foreseeable effect taht will result in reduced habitat quality and quantity, changes in habitat spatial arrangement that could affect the speices and reduced habitat quality due to greater resource extraction in areas that are now critical habitat for bear recovery. I will talk to you in any format, you can call me at 509 6303594 ir wrute ne at 200 S. kent Place East Wenatchee, Wa. 98802. Sincerely Kevin Kane	FWS-R6-ES-2016-0042-3036	
Two of their primary food sources, cutthroat trout and pine nuts are in serious decline. Housing and grazing encroachments continue to increase in the greater Yellowstone ecosystem which further stresses and displaces the grizzlies.	1002	1003					Factor E	Delisting grizzly bears at this time is a bad idea. Two of their primary food sources, cutthroat trout and pine nuts are in serious decline. Housing and grazing encroachments continue to increase in the greater Yellowstone ecosystem which further stresses and displaces the grizzlies. I live in Park County, Montana and know this area and have been around grizzly bears for over 20 years. I understand that the goal of the Endangered Species Act is to protect a species and restore it's numbers and then delist the species. Now is not the time to do this with grizzly bears.	FWS-R6-ES-2016-0042-3176	

Another argument once brought up is the availability of the white bark pine. It has been determined that the pine is not a significant factor limiting the bears. This argument should be irrelevant for the bear delisting issue. We can probably generalize if bears cannot rely on white bark pine, they will probably find something else to supplement their diet.	1002					Factor E	I support delisting the grizzly bear. As a wildlife biology and management major, I understand the importance of carrying capacity in wildlife. It is important that we manage the bears rather than letting their numbers run loose so that the population doesn't increase too much. Therefore we should be able to determine a reasonable population of bears and hunt them to keep them there. The grizzlies are at the top of the food chain, besides humans, so they aren't going to be in danger from other animals. They are in danger from themselves because if there is too high of a population they will start depleting all of the resources. Hunting is not something that should be taken away from us, so we need to share the available prey with them. Having too many top predators would reduce our ability to hunt because there will be smaller populations of prey. To keep the prey, such as elk, at optimal population numbers you would reduce our right rather than reducing the amount of bears. I think this is wrong. Yes we should have predators, but we shouldn't allow them to over populate. Right now, my step father lives in Wapiti, Wyoming, which most people know is on the main route the the east entrance of Yellowstone. Wapiti is highly colonized by people, and grizzlies share that habitat too. In the past several years, grizzlies have become more and more of a problem with the people living here. There is numerous amounts of wilderness lands around Yellowstone that should allow the bears to live comfortably. When bears and humans start having conflicts in developed areas I think we have a problem. I'm not saying bears will never be around humans, but when they are causing problems and government agencies are constantly moving, trapping, or killing bears this should be a red flag. There is a grizzly bear recovery zone set aside just for them. The bears are now well past those boundaries and expanding quickly. There is no reason to say they have not recovered and no longer need protection especially when the population has exceeded the target 500 bear goal by almost double. I grew up hunting, fishing, and camping on horses in the wilderness of Shoshone National Forest, and I have been face to face with grizzly bears. Those who want to protect them should have to go into an elk camp in September in the Thorofare and stay there for the month. After that experience, then I will listen to what they have to say. Every outfitter knows the struggles of the grizzlies in their camps, around their horses, clients, and carcasses. Bear advocates want to group outfitters as bear haters, but if they lived in the outfitter's shoes for a year, they might think differently too. Not to say they are bear haters, it's just another problem to stack onto their extremely high daily load of duties. Simultaneously, every once in a while there is a habituated grizzly bear that causes a problem, charges, or endangers someone's life in the backcountry. These bears should not be given more than one chance, but with them protected it causes many problems with anyone who shoots one in self defense. When a person is in a life threatening situation, they shouldn't have to hope they will not get accused of shooting an endangered species purposefully and fear the consequences that come with it. If grizzlies were delisted, needing to shoot a bear would result in simpler actions. From the government side of the spectrum, my father is a law enforcement officer for the forest service where he spends most days riding a horse in the wilderness. He encounters bears just like the outfitter, and he can first hand all of the problems. I also have worked	FWS-R6-ES-2016-0042-3160	
DECLINING FOOD SOURCES: Historically bears dependent on 4 food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides.	1002	1003	1004			Factor E	I completely OPPOSE delisting Yellowstone Grizzlies. For lots of reasons but these are the main ones, - DECLINING FOOD SOURCES: Historically bears dependent on 4 food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - STATE MANAGEMENT JEOPARDIZES THE GRIZZLIES SURVIVAL. Many states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. - MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - GRIZZLY BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. There is a poaching problem, a record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population of The Iconic Grizzly.	FWS-R6-ES-2016-0042-3243	
But current plans to delist grizzlies fail to recognize continued threats to what remains a small, fragile population. Crucial food sources have been lost to climate change, putting the bears under stress. Fewer cubs are living to adulthood. Human-bear encounters are increasing as bears range further in search of food, placing the bears in lethal peril. Even with ESA protections, the grizzly population has been static for over a decade. Without those protections, experts project that grizzly numbers will fall.	1006					Factor E	See Attached Attachments Regele Susan	FWS-R6-ES-2016-0042-3272	

Delisting will almost certainly lead to the reopening of sports hunting on grizzlies and the loss of genetic viability. It will hand over management of grizzlies to Montana, Wyoming and Idaho, states with poor to abysmal track records when it comes to defending the welfare of large predators.	1001						Factor E	See Attached Attachments Regele Susan	FWS-R6-ES-2016-0042-3272	
2. Even though grizzlies eat a wide variety of foods, the majority rely on whitebark pine seeds while others rely on Yellowstone cutthroat trout which have both significantly declined in recent years. These losses result in grizzlies looking for alternate high protein and fat food sources which may be one of the reasons why human caused grizzly deaths are on the increase.	1002	1003					Factor E	The IGBC has worked tirelessly for the recovery of grizzlies for many years and their population has increased a modest amount since 1975 when they were initially listed and I commend their efforts. I ask the question, what is the purpose and need to delist the GYE grizzly. I worked for the BLM my entire career and I know the pressure to delist species so management activities can go forward. I know the states have put pressure to allow their agencies to take over management, but let's let science decide and leave the politics to the politicians. Here is the need to continue the protection of GYE grizzly bears: 1. Grizzlies reproduce at one of the slowest pace of any large mammal in the US, so any loss of adult females would significantly adversely affect their overall population. 2. Even though grizzlies eat a wide variety of foods, the majority rely on whitebark pine seeds while others rely on Yellowstone cutthroat trout which have both significantly declined in recent years. These losses result in grizzlies looking for alternate high protein and fat food sources which may be one of the reasons why human caused grizzly deaths are on the increase. 3. Visitors to Yellowstone and Grand Teton National Parks provide hundreds of millions of dollars to the local economy and one of the main reasons for their visitation is to see live grizzly bears. I realize the ESAs purpose is not to provide economic stimulus, however, there is little doubt if grizzly bear hunts are allowed, less opportunity for bear observations will occur. 4. By continuing the protection, the grizzly gene pool will be maintained or improved. Furthermore, as they continue to expand their home ranges, their natural migration into the Bitterroot Mountains and Northern Continental Divide would be enhanced, instead of the continual isolation of the GYE. 5. Conflicts between grizzlies and humans are mainly due to livestock predation and hunter encounters. Their continued protection would put the onus on us, requiring us to learn how to live with them instead of them bearing our faults. There are ranchers living among grizzlies that have had few or no conflicts with bears for years because they have learned how to alter their practices. We know how to reduce human/grizzly conflicts, but if delisted, the indiscriminate killing (eventual hunting) would do little to reduce these conflicts. Grizzlies have two main needs, to eat and breed. Their main food sources before winter fat up are significantly declining and any loss of adult bears and especially breeding females would adversely affect their population and continued recovery. One of the greatest moments of my life occurred while hiking in Glacier NP and had a close encounter with a grizzly. Their presence on the wild landscape is an indicator of a fully functioning ecosystem and until they disperse to other recovery zones, there is no need to delist them.	FWS-R6-ES-2016-0042-3293	
There are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. A	1001						Factor E	The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, digging for grubs and hunting prey. Seeing a grizzly bear in the wild is usually an experience that remains with you for life. The Endangered Species Act has helped bring the grizzly bear back from the brink of extinction. The bears in the greater Yellowstone ecosystem need its help, and yours, to continue on their road to recovery. There are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival.	FWS-R6-ES-2016-0042-3349	

While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. A	1002	1006					Factor E	The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, digging for grubs and hunting prey. Seeing a grizzly bear in the wild is usually an experience that remains with you for life. The Endangered Species Act has helped bring the grizzly bear back from the brink of extinction. The bears in the greater Yellowstone ecosystem need its help, and yours, to continue on their road to recovery. There are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival.	FWS-R6-ES-2016-0042-3349	
Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. A	1006						Factor E	We must immediately stop the U.S. Fish and Wildlife Service (USFWS) from removing the grizzly bear in the Greater Yellowstone EcosystemMontana, Idaho and Wyomingfrom the Federal Lists of Endangered and Threatened Wildlife. They must not delist the Yellowstone grizzly bear.. Critics of the USFWS proposal say that lifting protections for the bear could endanger a growing population, and a lot of the US Public believe that also. The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to an estimated 700 or more today. But grizzly bears have all but disappeared from almost all of the continental United States, except for Yellowstone and Glacier National Park and a few other slivers of habitat, the New York Times reported May 3. After all I have read I wonderf if the delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that I sternly oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. We cannot let humans jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. I also read that the author of the report that led to the delisting proposal, Dr. Christopher Servheen, grizzly bear recovery coordinator, U.S. Fish and Wildlife Service, admits private land development is the greatest threat to the nation's grizzlies, as further development could cut off connectivity among populations and disrupt vital habitat. Please do what is right and scientifically backed and don't delist the grizzly bear because it would be the beginning of the end for them. Thank you for your time and consideration on this very important issue.	FWS-R6-ES-2016-0042-3441	
Acknowledging that precise calculations are not always possible in the conservation and ecology oriented applied sciences, a problem develops. New factors, such as global warming, gene pool isolation and increased concentrations of chemical residues in soils have rendered the previous calculations obsolete or incorrect. The fish and wildlife service must, as a matter of public trust, err on the side of caution and not remove the grizzly bears from the endangered species act. Their reproduction rate is lower than any North American mammal. Delisting and allowing hunting could lead to their demise in only a few short years.	1001	1006					Factor E	Don't delist the Yellowstone grizzly bears. Acknowledging that precise calculations are not always possible in the conservation and ecology oriented applied sciences, a problem develops. New factors, such as global warming, gene pool isolation and increased concentrations of chemical residues in soils have rendered the previous calculations obsolete or incorrect. The fish and wildlife service must, as a matter of public trust, err on the side of caution and not remove the grizzly bears from the endangered species act. Their reproduction rate is lower than any North American mammal. Delisting and allowing hunting could lead to their demise in only a few short years. Do NOT delist the grizzly bears!	FWS-R6-ES-2016-0042-3457	

How did the USFWS account for climate change in making this decision? Three of the Grizzly Bear's main food sources (pine nuts, elk, and cutthroat trout) are in decline.	1006	1002	1005	1003		Factor E	Delisting the Grizzly bear from Endangered species status is a bad idea. My understanding is that there has been a 6-10% multi-causal mortality of the Yellowstone population of Grizzly Bears during 2015. This level of mortality is not sustainable and hardly indicates a recovered population. Common sense would dictate that this trend needs to followed for several years before management is turned over to three states that are hostile to co-existence with large carnivores. A Reliable source, (Mattson, 2016) states that "dramatic increases in grizzly bear activity on moth sites have also contributed to inflated estimates of growth for the Yellowstone grizzly bear population. Bears on moth sites are almost certain to be seen by airborne researchers and managers out looking for females with cubs-of-the-year. " Endangered species status seemed to result in a dramatic recovery of the population over the past three decades. (until 2015)There will be inconsistent management of the Grizzly as a nuisance or as a potential trophy by Idaho, Montana and Wyoming. This will put the population at great risk. Hunters will claim that they had to shoot a bear in self- defense. Bears habituated to large metal objects (cameras) in Yellowstone NP will be treated very differently when confronted by large metal objects (rifles) outside of Yellowstone. How did the USFWS account for climate change in making this decision? Three of the Grizzly Bear's main food sources (pine nuts, elk, and cutthroat trout) are in decline. As someone who has spent much time observing and photographing bears in the wild, the magnificent Grizzly is a symbol of the wildness that remains in the American West. The Grizzly is a source of inspiration and is worshipped by many Americans. Those interested in sport hunting can travel to Alaska where the Alaskan Grizzly and Brown Bear are not endangered and have a stable food source. Would the USFWS please disclose the special interests that have been involved in their recommended delisting decision. I urge the USFWS to make a decision regarding the Grizzly Bear that is science based and not driven by political interests. Please expand the Primary Conservation Area for the Yellowstone Grizzly to include all of the known moth sites, and then protect these sites and a substantial surrounding area from any sport hunting. Better yet, please continue ESA for the Yellowstone Grizzly Howie Garber MD	FWS-R6-ES-2016-0042-3453	
I helped make a diorama about a grizzly turning over high mountain rocks in order to catch the small mammals that live there. Those small marmots and pikas are already endangered by climate change. The temps are too warm, the snow is too scarce, the seasons are out of synchrony. Bears eat them. Of course, bears eat as much vegetable matter as prey those big claws are garden rakes. The vegetation is also changing.	1006					Factor E	I've hugged a lot of grizzly bears because when they're dead and you're ready to skin them, you can only move them by getting a good grip. I was married to a taxidermist. I know a lot about the economics of the trophy business, the psychology of guys who fly-in to cross the continent to prove their balls. Since we had a museum with a mounted rearing, roaring griz, I know a lot about people who think it is funny to steal the rubber tongue. Since Bob Sriver was also a sculptor who made a portrait of Gentle Ben, I know a little about griz show biz. Quite a lot like politics. When I was out at the trash roll-off this morning (5/7), Shannon came alongside, excited to tell us about the griz hanging around Valier a few miles out. He'd been about fifteen feet away from it and went back to get his wife, who longs to see a griz. The Hutterites on the rez have been complaining about griz in their cows, but the Blackfeet Fish and Game haven't been able to shoot it yet. The idea is to pick out "bad" habituated bears, not trophy bears. And a little accurate shooting might not be a bad thing keep those bears wary. I know very little about Yellowstone grizzlies. I know quite a lot about Glacier Park Grizzlies. When you live in Heart Butte, where I taught on the high east slope of the rez, they teach you to pound on the side of a dumpster before you throw in your trash, so as to spook the bears out first. Often we could see griz going along peacefully on the side of Heart Butte. I used to sneak into the Montana Bear and Wolf meetings of professionals when Jonkel was active. You had to have some kind of a contact to find them, because the general public is so irrational in a dozen different ways, ranging from believing that bears love them the way they love bears, to seeing them as devils in fur that should be eliminated, to wanting a bear rug in their rumpus room to prove their testosterone level until they stub their toe on the bear's open mouth. I helped make a diorama about a grizzly turning over high mountain rocks in order to catch the small mammals that live there. Those small marmots and pikas are already endangered by climate change. The temps are too warm, the snow is too scarce, the seasons are out of synchrony. Bears eat them. Of course, bears eat as much vegetable matter as prey those big claws are garden rakes. The vegetation is also changing. I think it's too early to legalize bear hunting. I think people are reacting to the change in their businesses (like the dearth of skiing) and bad general economics by demanding new ways to make money. This pressure is going to continue for decades. Commodification of game animals is always a political plus for some people, and an atrocity to other people. It's hard to steer a sensible middle-course and it's scary when the bears are coming to town. But I think it's important to hold the line a while longer until we know more about managing grizzlies than shooting and bear spray. It's really more about managing politicians or even Supreme Court justices. Hunting can become a secret society.	FWS-R6-ES-2016-0042-3495	
The decision is premature and does not adequately factor in the decline of their main food sources due to climate change.	1006					Factor E	I am opposed to delisting the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal list of endangered species. The decision is premature and does not adequately factor in the decline of their main food sources due to climate change. There is no scientific reason to hunt Grizzly Bears, they are slow to reproduce and need protection, not targets on their back for the benefit of the constantly declining special interests of trophy hunters. Listen to the voices of scientists who have appealed to your poor and biased decision to remove the bears from esa protection. Listen to the comments from the public which are overwhelmingly against delisting Grizzlies. Stop listening to the diminished and shrieking voices of the minority who find pleasure in killing public wildlife for their own sick personal benefit.	FWS-R6-ES-2016-0042-3525	

Climate change, the loss of important food sources, low reproductive rates, and existing human-caused mortality all threaten the survival of this population. Removing healthy individuals from the gene pool and orphaning dependent cubs, compounded with the stress on surviving bears caused by the need to constantly run for their lives, will have untold consequences.	1006					Factor E	I live in rural New Mexico. I used to live in rural Idaho, Boise, Seattle, and Spokane. I watched the Mahleur Wildlife Refuge confrontation in Oregon, and was aghast Cliven Bundy de facto expropriated public land by threatening federal agents executing a court order. I have been menaced by people with livestock when lawfully accessing wilderness areas. I am aware of the political pressure imposed on the FWS by special interests who think public lands belong to them or should be open to plunder. This has led to wildlife managers in the states surrounding GYE states who make decisions based on politics instead of science. The New Mexico Department of Game and Fish recently changed a rule to allow steel leg-hold traps against cougars on public land despite overwhelming public opposition and weak conjectural evidence. This is what happened with the delisting of the grey wolf enabling a calamitous and, frankly, nauseating slaughter of these creatures. FWS is proposing to repeat this spectacle by delisting the Grizzly. The ESA process has succeeded in saving the grizzly bear from complete extirpation, but recovery takes time. Of the 50,000 grizzlies that roamed the lower 48 two centuries ago, only about 3% are left, and over half of those bears reside in the GYE - the area in and around Yellowstone and Grand Teton National Parks. Suggesting that a population which has struggled to increase its numbers by even a few hundred over the past 40 years is recovered is not logical. It is certain that removing federal protections from the GYE grizzly bear would result in a rush to hunt these bears down. A leaked memo detailing how these three states would divvy up the grizzlies to trophy hunters confirmed this. Opening a hunting season on these bears would not only lower their numbers, it would lower their chances of ever actually recovering. Climate change, the loss of important food sources, low reproductive rates, and existing human-caused mortality all threaten the survival of this population. Removing healthy individuals from the gene pool and orphaning dependent cubs, compounded with the stress on surviving bears caused by the need to constantly run for their lives, will have untold consequences. I am sick and tired of land, water, air, timber, and wildlife that is the heritage of all Americans managed as though it belongs to a privileged few. I know millions of Americans share my view. I hope FWS takes the scientifically correct and morally defensible position of continuing to protect what is left of this species. James Atkinson, PhD	FWS-R6-ES-2016-0042-3548	
low population diversity, a less than suitable bear habitat in GYE, continued habitat degradation and human encroachment, all the effects of climate change, reduced and in some cases the lack of preferred bear food sources (white bark pine nuts, cut throat trout) in GYE, the ecological importance of an apex predator in maintaining the health of the GYE ecosystems, and the spontaneous culling by "threatened" humans.	1001	1006	1002	1003		Factor E	While an understanding of the scientific justification* against de-listing of the grizzlies in Yellowstone should be enough, there is a possibly even greater argument for ensuring security for the grizzly: The continued existence of one of the world's most magnificent top predators that have roamed most of North America for eons, respected by Native Americans, feared by early explorers like Lewis and Clark, and held in awe by most of us. Is it too much to ask of us as Americans and also stewards of the land we have so grossly denigrated, to want to maintain a tiny corner of the country for one of the greatest symbols of wildness left on this earth? Our care and ability to secure a safe future existence for this grand, beautiful mammal, despite all odds against it, will leave a legacy that will speak volumes to future generations of Americans about who we were. * low population diversity, a less than suitable bear habitat in GYE, continued habitat degradation and human encroachment, all the effects of climate change, reduced and in some cases the lack of preferred bear food sources (white bark pine nuts, cut throat trout) in GYE, the ecological importance of an apex predator in maintaining the health of the GYE ecosystems, and the spontaneous culling by "threatened" humans.	FWS-R6-ES-2016-0042-3725	
Ecosystem Due to climate change the bears have less food and have to travel outside Yellowstone National Park and they could be shot the minute they step outside of Yellowstone. I am concerned about the availability of food for the bears. A multi-year (too long) period needed to verify and take action on the grizzly population drop, a primary conservation zone that is way too small, poor grizzly genetic diversity and U.S. Fish and Wildlife Service's failure to improve the bears' genetics by bringing in an outside grizzly like they said they would do.	1006					Factor E	I oppose the delisting of the Grizzly bears the Greater Yellowstone Ecosystem Due to climate change the bears have less food and have to travel outside Yellowstone National Park and they could be shot the minute they step outside of Yellowstone. I am concerned about the availability of food for the bears. A multi-year (too long) period needed to verify and take action on the grizzly population drop, a primary conservation zone that is way too small, poor grizzly genetic diversity and U.S. Fish and Wildlife Service's failure to improve the bears' genetics by bringing in an outside grizzly like they said they would do.	FWS-R6-ES-2016-0042-3749	

Where are the cutthroat trout, what can be done to ensure growth in this area, instead of the constant decline in numbers. Are the bears incapable of eating Lake trout and if this is the case why were they introduced to the ecosystem? What of the Whitebark pine seeds. If fires and beetles have seen a sharp decline in available food from these trees, what has been done since 1988 to replace what was lost. See, if you were for the bears all of these missing links in their ecosystem would have been on the to do list, would have been taken care of, so who dropped the ball?	1003	1002				Factor E	Only a few days ago I heard about the Proposed rule to remove the Grizzly Bears within the Greater Yellowstone ecosystem on the Federal List of Endangered and Threatened Wildlife list. This is to be done by the Fish and Wildlife Service. Many reasons for this have been explored in information offered, but this is where I think things become simple. You are either for the bears or against. In the research and explanations offered I am reading a text that is not only against these bears, but has been created in a way that I think appears biased in removing them from the list and I cannot fathom why this would be the case when it should be unbiased and simply based on facts gathered from multiple sources and from people with education in multiple disciplines. I am for the bears. I have an understanding that you believe their ecosystem will/has become incapable of supporting the current population, and that in the future the ecosystem will not be able to support them. I cannot fathom how studies into how to support their ecosystem have not been considered. You could not feign no knowledge of these issues when the bears have been so closely monitored over so many years. Where are the cutthroat trout, what can be done to ensure growth in this area, instead of the constant decline in numbers. Are the bears incapable of eating Lake trout and if this is the case why were they introduced to the ecosystem? What of the Whitebark pine seeds. If fires and beetles have seen a sharp decline in available food from these trees, what has been done since 1988 to replace what was lost. See, if you were for the bears all of these missing links in their ecosystem would have been on the to do list, would have been taken care of, so who dropped the ball? Is shooting Grizzlies in Yellowstone the answer, I don't think so. If your bears in your park are going to starve to death then look at how to fix it, not kill the bears so as to try to fool people. Where is the transparency in releasing data collected by your government. The IGBST is not releasing this, and that makes this situation look a lot more deplorable than it POSSIBLY is. Without evidence being able to be scrutinized by people outside of government and people with nil vested interests having a say in this decision how do we know that this decision is correct and honorable. Public Relations. My friends have visited your lovely park, and I had plans in the future to make this one of my destinations as they want to go back. I will not visit. Not only will I not visit, but I will tell anyone I know not to visit, not to support and not to participate. Without the draw card of me visiting Yellowstone I have no other reason to travel to your country in which case I will never visit and you will not get my money. Please take that seriously. I had always wanted to see Canada, but their recent decision to kill Polar Bears has now made me declare that I won't, and I am spreading the word rapidly about what they have done. Wait and see what a disaster it will be for them if you really need proof. I cannot conceive that a country that can send people into deep space, build war machines that only the strongest of imaginations could have dreamed up, and a country that is one of the strongest in the developed world, cannot sort out a little ecosystem vs grizzly bears issue. How has it come to killing? There has been some argument about genetics, well what about the genetics of removing bears, a dying genetic pool along with dying bears.	FWS-R6-ES-2016-0042-3745	
There has been some argument about genetics, well what about the genetics of removing bears, a dying genetic pool along with dying bears. What of the stress that will be inflicted on these great animals as population declines. As bears die they will know and there will be a backlash of stress, population decline, illness and sickness that goes with all vile acts perpetrated against a species. Then we will be left with no bears in Yellowstone. Imagine having to explain that one.	1001					Factor E	Only a few days ago I heard about the Proposed rule to remove the Grizzly Bears within the Greater Yellowstone ecosystem on the Federal List of Endangered and Threatened Wildlife list. This is to be done by the Fish and Wildlife Service. Many reasons for this have been explored in information offered, but this is where I think things become simple. You are either for the bears or against. In the research and explanations offered I am reading a text that is not only against these bears, but has been created in a way that I think appears biased in removing them from the list and I cannot fathom why this would be the case when it should be unbiased and simply based on facts gathered from multiple sources and from people with education in multiple disciplines. I am for the bears. I have an understanding that you believe their ecosystem will/has become incapable of supporting the current population, and that in the future the ecosystem will not be able to support them. I cannot fathom how studies into how to support their ecosystem have not been considered. You could not feign no knowledge of these issues when the bears have been so closely monitored over so many years. Where are the cutthroat trout, what can be done to ensure growth in this area, instead of the constant decline in numbers. Are the bears incapable of eating Lake trout and if this is the case why were they introduced to the ecosystem? What of the Whitebark pine seeds. If fires and beetles have seen a sharp decline in available food from these trees, what has been done since 1988 to replace what was lost. See, if you were for the bears all of these missing links in their ecosystem would have been on the to do list, would have been taken care of, so who dropped the ball? Is shooting Grizzlies in Yellowstone the answer, I don't think so. If your bears in your park are going to starve to death then look at how to fix it, not kill the bears so as to try to fool people. Where is the transparency in releasing data collected by your government. The IGBST is not releasing this, and that makes this situation look a lot more deplorable than it POSSIBLY is. Without evidence being able to be scrutinized by people outside of government and people with nil vested interests having a say in this decision how do we know that this decision is correct and honorable. Public Relations. My friends have visited your lovely park, and I had plans in the future to make this one of my destinations as they want to go back. I will not visit. Not only will I not visit, but I will tell anyone I know not to visit, not to support and not to participate. Without the draw card of me visiting Yellowstone I have no other reason to travel to your country in which case I will never visit and you will not get my money. Please take that seriously. I had always wanted to see Canada, but their recent decision to kill Polar Bears has now made me declare that I won't, and I am spreading the word rapidly about what they have done. Wait and see what a disaster it will be for them if you really need proof. I cannot conceive that a country that can send people into deep space, build war machines that only the strongest of imaginations could have dreamed up, and a country that is one of the strongest in the developed world, cannot sort out a little ecosystem vs grizzly bears issue. How has it come to killing? There has been some argument about genetics, well what about the genetics of removing bears, a dying genetic pool along with dying bears. What of the stress that will be inflicted on these great animals as population declines. As bears die they will know and there will be a backlash of stress, population decline, illness and sickness that goes with all vile acts perpetrated against a species. Then we will be left with no bears in Yellowstone. Imagine having to explain that one.	FWS-R6-ES-2016-0042-3745	
The population may be doing well now, however if removed from the list, hunting would quickly place them back on the list. It could also tip the scale in favor of this species ending up being lost forever. This is a small population, genetically isolated.	1001					Factor E	Please do not remove the Grizzly from the protected species list. The population may be doing well now, however if removed from the list, hunting would quickly place them back on the list. It could also tip the scale in favor of this species ending up being lost forever. This is a small population, genetically isolated. These two facts favor an outcome that is poor if hunting is allowed.	FWS-R6-ES-2016-0042-3858	

Although their population has increased they are still susceptible to the threats of habitat loss, climate change, and issues with reproduction based on a small population. We need to do everything we can to protect the wild lands that remain in north america, and by helping the species that live there thrive, we keep these parts as they should be - wild and untouched by humans.	1006						Factor E	Please do not delist the grizzlies from the Federal Endangered Species Act protection. Although their population has increased they are still susceptible to the threats of habitat loss, climate change, and issues with reproduction based on a small population. We need to do everything we can to protect the wild lands that remain in north america, and by helping the species that live there thrive, we keep these parts as they should be - wild and untouched by humans.	FWS-R6-ES-2016-0042-3863	
Just how do you count Grizzly bears? I don't think you can get an accurate count! Their food is vanishing, with the loss of Cutthroat trout and loss of the Whitebark pines. The loss of these bears by hunters, claiming an encounter.	1002	1003					Factor E	It is with a hopeful heart that you will read this letter from the first line to the last, and try to understand how important it is that our Grizzly bears are not de-listed. That the ESA stay in tact, and that individual states should not have control over our wildlife and public lands. This land belongs to you and I, and it is a gift to "ALL" American citizens! Not just hunters and cattleman who have their lobbyists. These bears are the true meaning of our wild America. They are true icons, ambassadors of the west, and they bring millions of visitors, and millions of visitor dollars to the economy of our western states. Just how do you count Grizzly bears? I don't think you can get an accurate count! Their food is vanishing, with the loss of Cutthroat trout and loss of the Whitebark pines. The loss of these bears by hunters, claiming an encounter. Extinction happens much faster than recovery. So please, think very carefully before you sign on the dotted line. I'd vote NO to delisting Grizzly's. I want my family for generations to come, to be able to visit our beautiful western states, and be able to see a wild Grizzly bears. "My Story" My husband had promised to take me on vacation to Yellowstone National Park for 30 years. A place I always wanted to visit, because of my love for wildlife and photography. Well, he made good on his promise, for my 60th birthday 8 years ago. My goal was to see a "Wild" grizzly bear. We had 10 days to accomplish this and rose every morning at 5am, to be out early. I was so full of excitement and anticipation. But, as the days slipped by (now on day 5) with not a single sighting, I asked if we could spend a couple of days in the Tetons. So off we headed. It took 2 more days, and then it happened! On day eight, our last day in the Tetons I saw my first grizzly bear. Not just any grizzly, but Grizzly # 399! As everybody learns quit quickly, when you see a car pulled over on the side of the road, it usually means something special has been spotted. We asked what this couple in the car saw, as we couldn't see anything in the tall grass. Then she appeared. What a majestic animal! We watched her (she was totally ignoring the huge crowd that had gathered) for an hour digging up grubs and stopping to sniff the cool fall air. It was an amazing glimpse into her wild world. I have been back to Greater Yellowstone two more times. Scrimped and saved every penny I could! The second trip, I did not get to see any bears. My last trip cost \$14,000.00. for only 9 days. Just to see Grizzly bears. Only one day out of that 9, was I lucky enough, with the help of a guide, to see another Grizzly. You aren't guaranteed a sighting. So, if I'm not seeing bears, I think, there really aren't as many as you think out there. Don't you want your families to see Grizzly bears for generations to come? Not just a trophy on somebody's wall or floor. Remember: EXTINCTION IS FOREVER Patrica Greig	FWS-R6-ES-2016-0042-3585	
FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely.	1001						Factor E	I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters. Yellowstone was almost destroyed with this insane and uneducated war on wolves and now (do we learn nothing??) the same is happening with the Grizzly Bears. It is mind boggling. Please consider that: Everything in your power should be done to protect this amazing mammal. FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Declining food sources pose a threat to Grizzlies and this delisting will be devastating to the Grizzly's chance of survival. Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Another natural curb in their number. Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains Grizzlies occupy only 1% of their historic range. AND PLEASE TAKE NOTE: Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years, caused by ignorant planning by humans, by the way. Hoping for some forward thinking and moral courage here! Thank you Anne K	FWS-R6-ES-2016-0042-3905	

I have heard from a number of highly reputable scientists who argue that there is insufficient genetic variation in this isolated pocket of bears to maintain a healthy population. This situation could contribute to a precipitous crash in the population and in fact is a good argument for efforts to expand the range of these bears to include corridors to other know Grizzly populations to facilitate greater genetic diversity.	1001					Factor E	I urge your agency to reconsider your intention to remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I have heard from a number of highly reputable scientists who argue that there is insufficient genetic variation in this isolated pocket of bears to maintain a healthy population. This situation could contribute to a precipitous crash in the population and in fact is a good argument for efforts to expand the range of these bears to include corridors to other know Grizzly populations to facilitate greater genetic diversity. The actual number of bears inhabiting the Greater Yellowstone Ecosystem is subject to methodology in inventory and may well be an indication of a stable population that would be adversely affected by removal from the endangered species list. There is absolutely no question that major food sources such as Whitebark pine nuts and Cutthroat trout are suffering rapid declines, and the early onset of spring has accelerated the emergence of hungry bears from their winter dens. We don't yet know how the radical and ongoing changes attributable to climate change will affect Grizzly bears, and I strongly argue for retaining the species on the Federal List of Endangered and Threatened Wildlife.	FWS-R6-ES-2016-0042-3953	
There is absolutely no question that major food sources such as Whitebark pine nuts and Cutthroat trout are suffering rapid declines, and the early onset of spring has accelerated the emergence of hungry bears from their winter dens. We don't yet know how the radical and ongoing changes attributable to climate change will affect Grizzly bears, and I strongly argue for retaining the species on the Federal List of Endangered and Threatened Wildlife.	1002	1003	1006			Factor E	I urge your agency to reconsider your intention to remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I have heard from a number of highly reputable scientists who argue that there is insufficient genetic variation in this isolated pocket of bears to maintain a healthy population. This situation could contribute to a precipitous crash in the population and in fact is a good argument for efforts to expand the range of these bears to include corridors to other know Grizzly populations to facilitate greater genetic diversity. The actual number of bears inhabiting the Greater Yellowstone Ecosystem is subject to methodology in inventory and may well be an indication of a stable population that would be adversely affected by removal from the endangered species list. There is absolutely no question that major food sources such as Whitebark pine nuts and Cutthroat trout are suffering rapid declines, and the early onset of spring has accelerated the emergence of hungry bears from their winter dens. We don't yet know how the radical and ongoing changes attributable to climate change will affect Grizzly bears, and I strongly argue for retaining the species on the Federal List of Endangered and Threatened Wildlife.	FWS-R6-ES-2016-0042-3953	
Please the Bears of yellowstone are genetically isolated just the same as if they were on their own island. If you delist it will lead to more in breeding and the failure of the species.		1001				Factor E	Please the Bears of yellowstone are genetically isolated just the same as if they were on their own island. If you delist it will lead to more in breeding and the failure of the species.	FWS-R6-ES-2016-0042-4112	

The x shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foods, are a threat to the grizzly's long term survival.	1002	1003				Factor E	No one really knows how many grizzlies are in the GYE. The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foods, are a threat to the grizzly's long term survival. The bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine which is a critically important food source." Climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting. The Greater Yellowstone	FWS-R6-ES-2016-0042-4226	
The x bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine which is a critically important food source." x Climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing.	1001	1002	1006			Factor E	No one really knows how many grizzlies are in the GYE. The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foods, are a threat to the grizzly's long term survival. The bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine which is a critically important food source." Climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting. The Greater Yellowstone	FWS-R6-ES-2016-0042-4226	
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Montana has released its management plan and is proposing a spring hunting season to run between March 15 and April 20. Yet we have already seen grizzly sows with cubs in Yellowstone National Park as early as April 16th. With warming temperatures in the future, emergence could occur even earlier than that. This means grizzly sows with new cubs could be killed and these tiny helpless bears left motherless.	1006					Factor E	~~I am asking you to NOT delist grizzly bears in the Greater Yellowstone Ecosystem. The USFWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. However, David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. In reality, no one really knows how many grizzlies are in the GYE. Furthermore, population growth has stagnated since the early 2000's, and the Yellowstone grizzly population declined by 59 bears in 2015 alone. The USFWS also claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide. Therefore, the grizzly bear cannot be delisted in just the GYE. By USFWS own estimates, around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Furthermore, Yellowstone's Grizzly population has no connectivity with outside populations, and has not for the last 100 years. This means that today's population came from a gene pool of only 136 animals (the population low point in 1975. This lack of genetic diversity threatens the Yellowstone grizzly's survival in the long term. USFWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. Whitebark pine nuts have long been considered to be the single most important food source for grizzlies. In the last 20 years, whitebark pines have been decimated by both blister rust and pine beetles. The pine beetle epidemic has been linked to climate change. According to Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council, "Yellowstone grizzly bears are likely declining in the wake of the loss of whitebark pine, a critically important food source." USFWS claims that Montana, Idaho, and Wyoming will successfully use hunting to manage the recovered grizzly bear population.If GYE grizzly bears are delisted, the three states have already signaled that they will open up trophy hunting seasons for the bears. Wyoming holds the vast majority of grizzlies. I do not believe that Wyoming can be considered capable of maintaining populations of any large carnivore in a scientific manner, considering its dismal record of "managing" wolf populations. Its wolf management is so bad that it has had to be struck down in federal court twice. Only now that the wolf has been relisted in Wyoming are we finally seeing wolves again in Grand Teton National Park, which will prove to increase visitation to that park and consequently tourist revenue. Montana has released its management plan and is proposing a spring hunting season to run between March 15 and April 20. Yet we have already seen grizzly sows with cubs in Yellowstone National Park as early as April 16th. With warming temperatures in the future, emergence could occur even earlier than that. This means grizzly sows with new cubs could be killed and these tiny helpless bears left motherless. The Greater Yellowstone Coalition (GYC) says that~~ ~~the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Montanan, Idaho, and~~	FWS-R6-ES-2016-0042-4260	
Grizzlies may be "generalists" when it comes to food supplies, but it is difficult to understand how you can dismiss the major dropoff in two of the GYE grizzly food sources, whitebark pine nuts and cutthroat trout, with a third major food source, cutworm moths, at high risk from the prospective drop in their availability with the introduction of GMO crops tailored to kill them in the fields where they spend most of their time. Only meat is left to the bears, along with minor food sources like forbs and grubs. And we all know the connection between meat carcasses and human interaction - whether with hunters, crossing roads or around ranchlands. It does not bode well for grizzlies. At a minimum, it seems that the diminishment of major food sources in the GYE should lead to a fuller consideration that the carrying capacity of the land has been reduced and the bears are ranging farther from their traditional territories in search of adequate diet replacements and this has not been fully evaluated in the Rule. It also does not appear to be "best science" as required by law to dismiss predictions of habitat changes that will directly affect grizzly bears without a fuller exploration of this issue than is contained in the proposed Rule. I understand that taxpayer funded data that you use has not been made available to the greater scientific community or independent scientists for review before a decision is made final on an action that is still open to much disagreement. I live in the Paradise Valley north of YNP and listen and talk to scientists who are working on these issues and it does appear that, in fact, there is hard evidence available showing that the isolated grizzly bear population growth rate is flat, if not declining, for more than 10 years. For an animal in recovery with the slowest reproductive rate of any North American mammal, still today occupying only 2% of their historic habitat (and are you allowed under case law to delist isolated segments of a population listed as a single entity under the ESA? I do not think so!), and with a mortality rate of 10% in 2015, it appears to me that the Rule now open to comment is sorely lacking the kind of high level and THOROUGH analysis addressing these issues and more that is deserved by this iconic creature. Too much is at stake. Please consider re-opening your review and include a panel of independent, qualified scientists who are working separately from current grizzly research in the GYE.	1002	1003	1004			Factor E	Grizzlies may be "generalists" when it comes to food supplies, but it is difficult to understand how you can dismiss the major dropoff in two of the GYE grizzly food sources, whitebark pine nuts and cutthroat trout, with a third major food source, cutworm moths, at high risk from the prospective drop in their availability with the introduction of GMO crops tailored to kill them in the fields where they spend most of their time. Only meat is left to the bears, along with minor food sources like forbs and grubs. And we all know the connection between meat carcasses and human interaction - whether with hunters, crossing roads or around ranchlands. It does not bode well for grizzlies. 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FWS-R6-ES-2016-0042-4277	

The proposed rule does not address genetic isolation of the bears. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. A Declining food sources. Historically bears dependent on 4 food sources - 2 of which (whitebark pine and cutthroat trout) are disappearing and moths, their third main food source, are unreliable food source due to pesticides. A	1001	1002	1003	1004		Factor E	#NAME?	FWS-R6-ES-2016-0042-4274	
Proposal does not reflect that there is a direct correlation between loss of pine bark as a food source and that bears will not find another alternative.	1002					Factor E	Do not delist Grizzly Bears. 1. The proposed rule does not address protecting grizzly habit outside the conservation area when in fact more than half spend their time in this area. 2. Proposal does not reflect that there is a direct correlation between loss of pine bark as a food source and that bears will not find another alternative. 3. Proposal does address the far reaching effects of climate change on the bear's denning habits. 4. Trophy hunting will take prime grizzlies from their latest offspring causing a devastating effect on future generations. 5. Proposal did not address the problem of genetic isolation if grizzlies are not allowed to roam outside of the conservation area.	FWS-R6-ES-2016-0042-4363	
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Delisting is also premature due to the long-term isolation of Yellowstone's grizzly bears. Relying on trucking in bears to deal with the problem of genetic isolation is risky and unwise, especially when it is still possible to naturally reconnect Yellowstone and Northern Continental Divide grizzly bear populations. Restoration of grizzly bears in the vast Selway Bitterroot recovery area would also boost connectivity between Northern Rockies ecosystems. Delisting and sport hunting would undermine prospects for connectivity and permanently isolate Yellowstone's grizzly bears.	1001					Factor E	I write to express my opposition to delisting of Yellowstone grizzly bears, and support of the efforts of Tribes to preserve the iconic and sacred Great Bear. State and federal agencies have not addressed the mounting threats of human development, climate change, invasive species, and the subsequent loss or diminishment of key foods, including whitebark pine seeds, cutthroat trout, and elk. As bears seek out yet more meat to compensate for the collapse of these foods, they are being killed at unsustainably high rates that threaten their survival. I am concerned that delisting would give full management authority to the states of Idaho, Wyoming and Montana, which are notoriously hostile to large carnivores. State management guarantees a grizzly bear sport hunt, which is not justified in light of current excessive mortality rates. Further, if grizzly bears are delisted, the states plan to eliminate them in habitat that is critical to their long-term recovery. Despite significant reductions in the availability of human foods and attractants to grizzly bears, humans are still the number one cause of bear mortality. Instead of delisting, a move that would dry up funds and lower agency commitment to coexistence programs, the Department of Interior should redouble efforts to reduce human-bear conflicts. Delisting is also premature due to the long-term isolation of Yellowstone's grizzly bears. Relying on trucking in bears to deal with the problem of genetic isolation is risky and unwise, especially when it is still possible to naturally reconnect Yellowstone and Northern Continental Divide grizzly bear populations. Restoration of grizzly bears in the vast Selway Bitterroot recovery area would also boost connectivity between Northern Rockies ecosystems. Delisting and sport hunting would undermine prospects for connectivity and permanently isolate Yellowstone's grizzly bears. I support the efforts of a growing coalition of Tribes that is dedicated to protecting Yellowstone's bears and preventing delisting. I ask that you initiate formal consultation with all involved tribes, and promptly correct the disrespectful and dismissive behavior of your staff towards Indian people involved with the grizzly bear issue. The sovereignty of Tribes must be recognized and respected. Recovery of the Yellowstone grizzly bear population is achievable, but not if the hard-fought gains of the last 40 years are reversed by delisting. Please do not risk the future of Yellowstone's iconic grizzly bears. Thank you for your consideration	FWS-R6-ES-2016-0042-4399	
Climate change's effect on the food sources of the Yellowstone ecosystem are profound. They alone are reason enough never to de-list the Yellowstone Grizzly. The whitebark pine nuts are a major Grizzly food source, and have all but disappeared from Yellowstone due to higher winter temperatures. The white bark pine is also found in high remote unoccupied areas where the female Grizzly can feed undisturbed. Army cutworm moths, another Grizzly food source found in high talus fields are being pushed north out of Yellowstone by rising temperatures, and pesticide spraying in the plains states. As the weather gets hotter and dryer it stresses the vegetation and grasses the base animals depend on, causing a decline in the food quality for Elk, Bison and rodents, all bear food source. Cutthroat Trout are also disappearing, after the appearance of Lake Trout in Yellowstone lake. The efforts to eradicate the Lake trout have been expensive and unsuccessful.	1006	1002	1005	1004		Factor E	I am writing you to request that you not de-list the Grizzly Bear from the ESA, Climate change's effect on the food sources of the Yellowstone ecosystem are profound. They alone are reason enough never to de-list the Yellowstone Grizzly. The white bark pine nuts are a major Grizzly food source, and have all but disappeared from Yellowstone due to higher winter temperatures. The white bark pine is also found in high remote unoccupied areas where the female Grizzly can feed undisturbed. Army cutworm moths, another Grizzly food source found in high talus fields are being pushed north out of Yellowstone by rising temperatures, and pesticide spraying in the plains states. As the weather gets hotter and dryer it stresses the vegetation and grasses the base animals depend on, causing a decline in the food quality for Elk, Bison and rodents, all bear food source. Cutthroat Trout are also disappearing, after the appearance of Lake Trout in Yellowstone lake. The efforts to eradicate the Lake trout have been expensive and unsuccessful. Grizzly bear mortality by all causes (human and natural) is precarious at best. Sport(Trophy) hunting can easily push bear mortality past the brink of recovery. The Grizzly bear reproductive rate is extremely low making any recovery very slow.(Kind of like the white bark pine). Once Grizzly deaths exceed births you are headed towards extinction. De-listing would accelerate this and the proposed controls are to slow reacting to properly ward this off. The Grizzly bear population has leveled out in recent years and the cause of this leveling off should be identified by further research. The power and push of the states to grant hunting rights to the wealth few to increase revenue is offset by the money spent by others to see wild Grizzlies. I live in a state that had, or may have them and I feel the sorrow of their absence. Thank you for the chance to present a few random thoughts.	FWS-R6-ES-2016-0042-4505	
Grizzly bear mortality by all causes (human and natural) is precarious at best. Sport(Trophy) hunting can easily push bear mortality past the brink of recovery. The Grizzly bear reproductive rate is extremely low making any recovery very slow.(Kind of like the white bark pine). Once Grizzly deaths exceed births you are headed towards extinction. De-listing would accelerate this and the proposed controls are to slow reacting to properly ward this off. The Grizzly bear population has leveled out in recent years and the cause of this leveling off should be identified by further research.	1002					Factor E	I am writing you to request that you not de-list the Grizzly Bear from the ESA, Climate change's effect on the food sources of the Yellowstone ecosystem are profound. They alone are reason enough never to de-list the Yellowstone Grizzly. The white bark pine nuts are a major Grizzly food source, and have all but disappeared from Yellowstone due to higher winter temperatures. The white bark pine is also found in high remote unoccupied areas where the female Grizzly can feed undisturbed. Army cutworm moths, another Grizzly food source found in high talus fields are being pushed north out of Yellowstone by rising temperatures, and pesticide spraying in the plains states. As the weather gets hotter and dryer it stresses the vegetation and grasses the base animals depend on, causing a decline in the food quality for Elk, Bison and rodents, all bear food source. Cutthroat Trout are also disappearing, after the appearance of Lake Trout in Yellowstone lake. The efforts to eradicate the Lake trout have been expensive and unsuccessful. Grizzly bear mortality by all causes (human and natural) is precarious at best. Sport(Trophy) hunting can easily push bear mortality past the brink of recovery. The Grizzly bear reproductive rate is extremely low making any recovery very slow.(Kind of like the white bark pine). Once Grizzly deaths exceed births you are headed towards extinction. De-listing would accelerate this and the proposed controls are to slow reacting to properly ward this off. The Grizzly bear population has leveled out in recent years and the cause of this leveling off should be identified by further research. The power and push of the states to grant hunting rights to the wealth few to increase revenue is offset by the money spent by others to see wild Grizzlies. I live in a state that had, or may have them and I feel the sorrow of their absence. Thank you for the chance to present a few random thoughts.	FWS-R6-ES-2016-0042-4505	

By the Service's own admission "Grizzly bears are currently found approximately halfway between the NCDE and GYE areas and it is likely that these populations will connect in the near future through natural dispersal and movements." (https://www.fws.gov/mountain-prairie/es/GYE%20Grizzly-FAQs.pdf) However, the habitat connectivity required to allow for continued levels of gene flow that would allow these subpopulations to function as a metapopulation will require continued federal coordination to achieve, and without the ESA listing, strong protections will not be in place for dispersing bears outside the PCA. Designating the GYE population as a DPS, while it may be technically acceptable according to the Service's policy, is short-sighted with respect to the current status of the GYE and NCDE populations, and the central importance of future connectivity between them. Shafer (2015) stated "Although heroic efforts have been underway to facilitate corridor creation, the opportunity to allow for a more permeable landscape so the GYE grizzly bear population can disperse to the NCDE or the Bitterroot-Selway-Frank Church River of No Return wilderness complex, or vice versa, will not last indefinitely." "It is not enough that " Approaches for increasing the likelihood of natural movement of grizzly bears and genetic interchange between the GYE and the NCDE populations, have been outlined in the Conservation Strategy." The Service needs to stay the course and continue to protect the GYE population (and most critically, dispersing bears from both populations) under the ESA until they can be reconnected.	1001						Factor E	I am writing to strongly oppose the delisting of the Greater Yellowstone Ecosystem population of grizzly bear (<i>Ursus arctos horribilis</i>) under the Endangered Species Act (ESA). The delisting proposal is based on recovery goals for the GYE population that do not consider the necessary reconnection of the GYE population with the NCDE population to the north. Without establishing this connection before delisting, critical opportunities to ensure the long-term genetic health of the species will be lost. By the Service's own admission "Grizzly bears are currently found approximately halfway between the NCDE and GYE areas and it is likely that these populations will connect in the near future through natural dispersal and movements." (https://www.fws.gov/mountain-prairie/es/GYE%20Grizzly-FAQs.pdf) However, the habitat connectivity required to allow for continued levels of gene flow that would allow these subpopulations to function as a metapopulation will require continued federal coordination to achieve, and without the ESA listing, strong protections will not be in place for dispersing bears outside the PCA. Designating the GYE population as a DPS, while it may be technically acceptable according to the Service's policy, is short-sighted with respect to the current status of the GYE and NCDE populations, and the central importance of future connectivity between them. Shafer (2015) stated "Although heroic efforts have been underway to facilitate corridor creation, the opportunity to allow for a more permeable landscape so the GYE grizzly bear population can disperse to the NCDE or the Bitterroot-Selway-Frank Church River of No Return wilderness complex, or vice versa, will not last indefinitely." It is not enough that " Approaches for increasing the likelihood of natural movement of grizzly bears and genetic interchange between the GYE and the NCDE populations, have been outlined in the Conservation Strategy." The Service needs to stay the course and continue to protect the GYE population (and most critically, dispersing bears from both populations) under the ESA until they can be reconnected.	FWS-R6-ES-2016-0042-5488	
Whitebark pine is declining significantly and that is a major food source. To compensate bears are having to turn to other food sources including hunting more game. That increases their chances for injury as well as more human-bear conflict. Less youngsters are surviving the last several years as well. When you consider how slowly a female bear of cub-bearing age is replaced losing even a single bear can have big consequences. Opening up the bear to hunting will allow for that to happen quickly and it may be too late to stop a crash in the population by the time it is detected.	1002	1005					Factor E	Please, keep the grizzly bears on the endangered list. The population has leveled off in recent years and I do not believe it is simply as a response to the available land reaching capacity. Whitebark pine is declining significantly and that is a major food source. To compensate bears are having to turn to other food sources including hunting more game. That increases their chances for injury as well as more human-bear conflict. Less youngsters are surviving the last several years as well. When you consider how slowly a female bear of cub-bearing age is replaced losing even a single bear can have big consequences. Opening up the bear to hunting will allow for that to happen quickly and it may be too late to stop a crash in the population by the time it is detected. I do not believe the states and federal government have the capacity to monitor hunting and the bear population adequately. This population is cut off from the rest, there is no natural corridor to improve genetic diversity or to support growth. Even from purely economical perspective if we start losing bears the states will lose money from tourists, who come specifically to view those magnificent creatures. Please, re-consider this proposed action and give the bears more time to adapt to the changes in climate and environment.	FWS-R6-ES-2016-0042-0016	
In order to ensure the long term survival of this isolated population and expand its gene pool, protected corridors to other regions need to be established.		1001					Factor E	I OPPOSE the delisting of Grizzly Bears on the following grounds: In order to ensure the long term survival of this isolated population and expand its gene pool, protected corridors to other regions need to be established. The grizzly bear is one of the slowest reproducing mammals on this continent, taking a minimum of 3 years to produce each offspring. There is currently no significant increase in grizzly bear populations, therefore it is premature to reintroduce hunting on them, as it may put them in another serious decline. Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions. There is a decline in the grizzly bear's primary food sources due to climate change, forcing bears to search further for their food. If no federal protections are in place, grizzlies would not be able to reach further vital food sources in Wyoming. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government, as is the case with Gray wolves.	FWS-R6-ES-2016-0042-0360	

There is a decline in the grizzly bear's primary food sources due to climate change, forcing bears to search further for their food. If no federal protections are in place, grizzlies would not be able to reach further vital food sources in Wyoming.	1006					Factor E	I OPPOSE the delisting of Grizzly Bears on the following grounds: In order to ensure the long term survival of this isolated population and expand its gene pool, protected corridors to other regions need to be established. The grizzly bear is one of the slowest reproducing mammals on this continent, taking a minimum of 3 years to produce each offspring. There is currently no significant increase in grizzly bear populations, therefore it is premature to reintroduce hunting on them, as it may put them in another serious decline. Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions. There is a decline in the grizzly bear's primary food sources due to climate change, forcing bears to search further for their food. If no federal protections are in place, grizzlies would not be able to reach further vital food sources in Wyoming. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government, as is the case with Gray wolves.	FWS-R6-ES-2016-0042-0360	
With our climate changing we are going to see many changes to the way our wildlife survives and they do not need massive human intervention added to this fate.	1006					Factor E	I am writing with great concern over the delisting of Grizzly Bears from Yellowstone. These magnificent animals are a top predator along with our wolves and need to remain protected particularly in the area of Yellowstone where due to no hunting they have become a very healthy successful population. There are not many places left where our top predators are afforded this well established safe and free life. These animals are very important to the land and a healthy ecosystem which we must work very hard to not destroy. This bill that gives states the right to kill our wildlife without the public having no say in over turning the ruling is just plain a major injustice. Our numbers are far greater than those supporting such actions which are ranchers and hunters. Yellowstone brings in a very large amount of tourism dollars in the name of viewing wildlife and for many it is a yearly venture. Some of our most iconic and historic species live in Yellowstone and they must be preserved before all they become is a story of the past. With our climate changing we are going to see many changes to the way our wildlife survives and they do not need massive human intervention added to this fate. Seems our wildlife including Grizzly Bears are stuck in a political tug of war and this needs to stop! Our wildlife and their habitat is not about greed it is about science...pure and simple. We owe it to our future generations to preserve the majestic wildlife and the limited lands they have left before it is too late. We have spent far too much money to reintroduce, list and protect species such as Grizzlies to spend more money killing them. Plain and simple it is just wrong! We need agencies that are knowledgeable about our wildlife and their benefits to the planet and not ones that bow to special interest and offer no protections. I have always wanted to visit Yellowstone but if the killing continues as I have with Idaho I will be avoiding Montana & Wyoming as well. I simply cannot support these practices!	FWS-R6-ES-2016-0042-0013	
. Genetic connectivity has not been assured. Bears outside the DMA will not be counted toward the total amount. These are the bears that will be the ones moving north to ensure connectivity. These will be the bears easiest for hunters to kill.	1001					Factor E	I do not support delisting grizzlies at this time because: 1. Genetic connectivity has not been assured. Bears outside the DMA will not be counted toward the total amount. These are the bears that will be the ones moving north to ensure connectivity. These will be the bears easiest for hunters to kill. 2. The delisting rules do not require livestock owners to take any responsibility for preventative measures. Certain areas of the DMA, in particular the Green River, have seen a lot of livestock problems with bears. This is because there are too many cattle and sheep on public lands in the main corridor for grizzlies traveling south into the Wind River range which is excellent habitat. This issue is not addressed in your delisting mandate and will just result in additional dead bears. 3. It is not clear whether the reason the bear population has remained flat since 2002 is because, as some scientists claim, bear habitat is full in the GYE or, as other scientists say, the main food sources of the bears is drying up and they are moving out to find new food sources. Bears in the GYE are unique in their food sources--pine nuts, moths, cutthroat trout. Especially the pine nuts for fattening up for hibernation is the most important food source. 90% of our whitebark pine trees are functionally dead in the ecosystem. The impact on the bears is still not clear and so delisting is premature. 4. Given the unknown impacts of climate change and changing food sources, and given that we've spent 40 years restoring the grizzly to the GYE, why rush now into delisting just to shoot bears. Why not wait another 5 or 10 years to see the impacts of changing foods and why the population has remained flat? 5. Referring to #4, this year over 50 bears died in the ecosystem, more than 1/2 from human conflicts. Bears are one of the slowest reproducing mammals in North America. With delisting comes hunting and more bears killed, indiscriminately. A female bear will at best in 10 years just duplicate herself. We cannot afford to have female bears hunted. A female without cubs in tow will just look like a male to a hunter. 6. There needs to be more responsibility in the delisting mandate placed on protecting human food sources. I live in bear country and at one time the WG&F had some funds to subsidize bear garbage cans so they were only \$50. That money ran out years ago and a bear proof garbage can for a homeowner is \$150. No one would buy that. Also there are many rough campgrounds without any bear boxes on FS lands. And dispersed camping is allowed and many of those campsites people burn their trash, which leaves odors. People are not educated about their bird feeders, nor protecting their grain. There needs to be a requirement that the states subsidize these protections, and also federal funding on federal campgrounds for bear boxes and/or bear proof garbage cans. 7. I think the DMA should be treated like the PCA. I am thinking especially of the Wind Rivers and Fitzpatrick Wilderness areas. In the entire GYE, these mountains still have good White Bark Pines--where probably only about 40% are dead. It is excellent habitat, including berries. The same rules should apply there. 650 bears in the ecosystem is really not many at all. I highly doubt any scientist can know the carrying capacity of the GYE and therefore say 'the ecosystem is full'. That works out to 1 bear every 30 miles!	FWS-R6-ES-2016-0042-0029	

as climate conditions change and all interdependent species adjust, the stability of the network will be tested; to err on the side of caution is only prudent.	1006					Factor E	I oppose the delisting of GYE Grizzlies; of all the reproductive cycles of large mammals of this continent, theirs is the slowest- approximately 10 years for a healthy breeding sow to reproduce herself in a guild of niches; as climate conditions change and all interdependent species adjust, the stability of the network will be tested; to err on the side of caution is only prudent. Please reject the politicised/ uninformed directives of those who put personal or monetary concern above protecting the long term viability of one of the few remaining relatively intact ecosystems in our nation.	FWS-R6-ES-2016-0042-0028	
Of course, not every bear have the same tolerance for people. By killing the most people-habituated ones first would leave a population of bears that are more prone to hide from people (we can't simply replace a human-conditioned bear with one that isn't, which is something the statistics do not account). It's really hard to take in the activity of bear viewing it they are constantly trying to hide. This will do nothing to satisfy the growing demand of people wanting to see bears, and the loss of the road-side bears by killing them outside the park will have a negative impact on the jobs and the revenue as outlined above.						Factor E	While I am sure many people are contributing scientific comments about why the delisting should not occur, I would like to discuss why delisting would be bad in terms many people will understand: money. Simply stated: Lift the ESA ban on hunting and the local economy could lose a growing revenue stream that is currently estimated at \$10 million, and would affect more than 150 jobs in the area. Why? The lifting of ESA protections and granting the management of bears to individual states mean one thing: trophy hunting. It is an activity that attracts a small percentage of the population, and brings in far less than the estimated \$10 million in revenue in the non-consumptive activity of bear viewing. The problem comes in as many of the bears who spend their summer in Yellowstone -- the same ones where a study found that people would pay an extra \$41 if they are guaranteed to see a bear -- are human-habituated. They are in many ways celebrities. But bears do not understand political boundaries. And for those who are these celebrities within the Park, they don't know the difference between a human pointing a camera or a gun. As such, the first and most likely victims of trophy hunting are these roadside, human-habituated bears. Of course, not every bear have the same tolerance for people. By killing the most people-habituated ones first would leave a population of bears that are more prone to hide from people (we can't simply replace a human-conditioned bear with one that isn't, which is something the statistics do not account). It's really hard to take in the activity of bear viewing it they are constantly trying to hide. This will do nothing to satisfy the growing demand of people wanting to see bears, and the loss of the road-side bears by killing them outside the park will have a negative impact on the jobs and the revenue as outlined above. For these reasons, and for reasons outlined by those with a much more scientific-based argument on the biology of bears and their habitat, I urge that the ESA protections remain in place.	FWS-R6-ES-2016-0042-0024	
The Yellowstone Bear population has been isolated for over 100 years and some evidence suggests that the population is suffering from the effects of inbreeding.	1001					Factor E	To Secretary of the Interior Ms. Sally Jewell, I am writing to you about the issue of the U.S. Fish and Game Department's decision to remove the Yellowstone Grizzly Bear aka Brown Bear off the Federal Endangered Species Protection list. This is a complex issue as are the consequences of this amazing animal losing their endangered protection. The final answer as to why the Yellowstone Grizzly should not be removed is clearly because the species is not recovered. Instead of delisting, with all the time, money, and effort spent to bring back the bear from extinction, more money and time needs to be spent educating the growing human population on living in bear territory. Currently, the #1 cause of bear mortality still stems from conflicts with people. A secondary unforeseen problem that has reared its ugly head in recent years is the misinformation campaign of certain US agencies as well as one sided mainstream media stories. For example, government agencies and U.S. newspaper articles have claimed that the Yellowstone Bear population has increased and even doubled since the last time the US Fish and Game tried to remove the bear in 2006. In dissent of this opinion, a recent annual report compiled by Dr. David Mattson from the Interagency Grizzly Bear Study Team concludes that the Yellowstone Grizzly population has not only not grown since 2002, it has actually declined since 2007. This effort to misinform the public is both disturbing and problematic because the American people are not getting the truth. Let it be known that I wish to only focus on a few important points in this letter as opposed to the many reasons as to why delisting the Yellowstone Bear is the wrong move at this time. Female bears if healthy only have litters about every 3 years and do not reproduce easily. The Yellowstone Bear population has been isolated for over 100 years and some evidence suggests that the population is suffering from the effects of inbreeding. The Brown Bear currently occupies about 1% of their historic range prior to Europeans settling the United States. While there is available habitat suitable for Brown Bears that could be used to connect the few remaining populations in the lower 48 states, the current plan calls for flying or driving male brown bears to Yellowstone in order to mate and improve their genetic diversity. Again, this is a wrong-headed move unless given no other choice to sustain a healthy population. Currently, ranchers and farmers are compensated for the loss of domesticated animals by Yellowstone Bears. While some ranchers are working out their differences peacefully with grizzly bears, others are not. For that reason, federal oversight is still necessary. The issue of climate change as it relates to the loss of the bear's food sources must also be addressed. U.S. Fish and Wildlife Service has claimed that it's OK to delist the Grizzly now, even though it has lost 2 of their 4 major food sources because of climate change and invasive species. Warming temperatures are expected to remove the summer alpine haunts of one of the other remaining key foods: army cutworm moths. In the face of an unraveling ecosystem, bears have been turning to the dangerous practice of eating more meat. Unsustainable numbers of bears are being killed as result of conflicts with incautious big game hunters and ranchers. More needs to be done to reduce conflicts, not less. Lastly, another consequence of delisting the brown bear is that they will once again be hunted. ~~Factor surrounding Yellowstone have already recovered the bear will once again be hunted. Must be the bear is overabundant caused~~	FWS-R6-ES-2016-0042-0008	

The Brown Bear currently occupies about 1% of their historic range prior to Europeans settling the United States. While there is available habitat suitable for Brown Bears that could be used to connect the few remaining populations in the lower 48 states, the current plan calls for flying or driving male brown bears to Yellowstone in order to mate and improve their genetic diversity.	1001					Factor E	To Secretary of the Interior Ms. Sally Jewell, I am writing to you about the issue of the U.S. Fish and Game Department's decision to remove the Yellowstone Grizzly Bear aka Brown Bear off the Federal Endangered Species Protection list. This is a complex issue as are the consequences of this amazing animal losing their endangered protection. The final answer as to why the Yellowstone Grizzly should not be removed is clearly because the species is not recovered. Instead of delisting, with all the time, money, and effort spent to bring back the bear from extinction, more money and time needs to be spent educating the growing human population on living in bear territory. Currently, the #1 cause of bear mortality still stems from conflicts with people. A secondary unforeseen problem that has reared its ugly head in recent years is the misinformation campaign of certain US agencies as well as one sided mainstream media stories. For example, government agencies and U.S. newspaper articles have claimed that the Yellowstone Bear population has increased and even doubled since the last time the US Fish and Game tried to remove the bear in 2006. In dissent of this opinion, a recent annual report compiled by Dr. David Mattson from the Interagency Grizzly Bear Study Team concludes that the Yellowstone Grizzly population has not only not grown since 2002, it has actually declined since 2007. This effort to misinform the public is both disturbing and problematic because the American people are not getting the truth. Let it be known that I wish to only focus on a few important points in this letter as opposed to the many reasons as to why delisting the Yellowstone Bear is the wrong move at this time. Female bears if healthy only have litters about every 3 years and do not reproduce easily. The Yellowstone Bear population has been isolated for over 100 years and some evidence suggests that the population is suffering from the effects of inbreeding. The Brown Bear currently occupies about 1% of their historic range prior to Europeans settling the United States. While there is available habitat suitable for Brown Bears that could be used to connect the few remaining populations in the lower 48 states, the current plan calls for flying or driving male brown bears to Yellowstone in order to mate and improve their genetic diversity. Again, this is a wrong-headed move unless given no other choice to sustain a healthy population. Currently, ranchers and farmers are compensated for the loss of domesticated animals by Yellowstone Bears. While some ranchers are working out their differences peacefully with grizzly bears, others are not. For that reason, federal oversight is still necessary. The issue of climate change as it relates to the loss of the bear's food sources must also be addressed. U.S. Fish and Wildlife Service has claimed that it's OK to delist the Grizzly now, even though it has lost 2 of their 4 major food sources because of climate change and invasive species. Warming temperatures are expected to remove the summer alpine haunts of one of the other remaining key foods: army cutworm moths. In the face of an unraveling ecosystem, bears have been turning to the dangerous practice of eating more meat. Unsustainable numbers of bears are being killed as result of conflicts with incautious big game hunters and ranchers. More needs to be done to reduce conflicts, not less. Lastly, another consequence of delisting the brown bear is that they will once again be hunted. ~~States surrounding Yellowstone have already announced the bear will once again be hunted. Without the bear's protection, several~~	FWS-R6-ES-2016-0042-0008	
Delisting these bears would be premature. They are genetically isolated from the bears in northern Montana and Canada. That means the population must be particularly robust - and there is not evidence to suggest that it is. Further, it is still possible to connect these two populations through the Selway Bitterroot Recovery Area. Certainly, there are more sightings of bears but that does not mean that there are actually more bears. With the sharp decline of whitebark pine seeds, cutthroat trout, and elk as well as the drop in berries, grizzly bears have had to range further in search of food. That search often puts them in conflict with humans and has forced grizzlies to resort to more meat, which sometimes means more livestock.Indeed, the number one cause of death for grizzlies in the Yellowstone Ecosystem these days is human. Delisting would only exacerbate this. Instead of delisting the bears, please consult with the coalition of Tribes. Please work with them to achieve full recovery of the Yellowstone grizzly bear. Please do not risk the future of Yellowstone's iconic grizzly bears. Please give me and my family another chance to experience the magic of Yellowstone grizzly bears.	1001	1002	1003	1005		Factor E	I write to OPPOSE the proposed delisting. My family visited Yellowstone a couple of years ago. We were fortunate enough to see a mother grizzly with her three cubs. A coyote waited in the wings for them to finish feasting on a carcass. It was magical, amazing and connected my children to nature in a way they have never forgotten. Delisting these bears would be premature. They are genetically isolated from the bears in northern Montana and Canada. That means the population must be particularly robust - and there is not evidence to suggest that it is. Further, it is still possible to connect these two populations through the Selway Bitterroot Recovery Area. Certainly, there are more sightings of bears but that does not mean that there are actually more bears. With the sharp decline of whitebark pine seeds, cutthroat trout, and elk as well as the drop in berries, grizzly bears have had to range further in search of food. That search often puts them in conflict with humans and has forced grizzlies to resort to more meat, which sometimes means more livestock. Indeed, the number one cause of death for grizzlies in the Yellowstone Ecosystem these days is human. Delisting would only exacerbate this. Instead of delisting the bears, please consult with the coalition of Tribes. Please work with them to achieve full recovery of the Yellowstone grizzly bear. Please do not risk the future of Yellowstone's iconic grizzly bears. Please give me and my family another chance to experience the magic of Yellowstone grizzly bears.	FWS-R6-ES-2016-0042-0253	
Questionable science as to "Carrying Capacity". Rather than reaching carrying capacity, the decline in primary food sources due to climate change, non native fish, and heavy pesticide use; are forcing bears to search further for their food including cutthroat trout, especially Whitebark Pine nuts and army cutworm moths.	1006	1003	1002			Factor E	I OPPOSE the delisting of Grizzly Bears on the following grounds: 1) The current populations are being managed for stability, not growth. There is no significant increase in grizzly populations. Reinstating any kind of hunt prematurely on this species risks a decline in numbers that most likely will exceed reproduction rates. 2) Questionable science as to "Carrying Capacity". Rather than reaching carrying capacity, the decline in primary food sources due to climate change, non native fish, and heavy pesticide use; are forcing bears to search further for their food including cutthroat trout, especially Whitebark Pine nuts and army cutworm moths. 3) Without federal protections, grizzlies would not be able to reach further vital food sources in Wyoming. 4) The Grizzly bear species are the slowest reproducing mammals in North America. Reproducing every 3 years and at best, will duplicate herself in a 10-year period. 5) Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions. 6) The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray wolves) 7) Genetic Connectivity is vital to the long term survival of the species. The population/gene-pool is too isolated prohibiting genetic diversity within the species. For long term survival the grizzly needs protected corridors to reach other regions to expand the gene pool. 8) Even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. 9) It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. 10) The Yellowstone grizzly population faces enormous threats from increasing regional human populations, energy development, climate change, decline in food sources caused by climate change, habitat degradation caused by climate warming, problematic livestock husbandry practices, hostile state management, and unreliable methods for monitoring status and trends. 11) Compared to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of aggressive state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. 12) And, without doubt, colonization of new ranges will be the first casualty of state management. Populations will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range. I come to Yellowstone every year to view the wildlife. I don't understand with all the scientific evidence NOT TO DELIST, that you have to put a so called "management plan" in effect just to allow the grizzlies to be trophy hunted. Taking them off the Endangered Species Act has nothing to do with allowing the states to hunt and kill them to be made into rugs or head mounts.	FWS-R6-ES-2016-0042-0332	

As a concerned citizen I would like to voice my concern about the USFWS's proposed delisting of the Yellowstone grizzly bears. How could you release management of this iconic species to the states that forced the USFWS to list them in the first place under the Endangered Species Act? Look what happened to the gray wolf when it was delisted in 2012; the governing body of Wyoming allowed wolves to be shot on sight and just like that years of careful conservation efforts were setback decades. The status of the grizzly bear indirectly protects other species as the ESA safeguards the habitat of not only the grizzly but every other creature who lives alongside it. I can also point to the fact that two major food sources the grizzly bear relies on have drastically plummeted. Whitebark pine seeds and cutthroat trout do not command the numbers they must in order for grizzlies to not go into human inhabited areas and search out alternative food sources, increasing their risk of being shot. Whitebark pine is in fact listed as endangered by the International Union for the Conservation of Nature. I understand the USFWS is looking for a success story. I would argue you have already found some in the American alligator, the black footed ferret, the whooping crane, and the California condor. There is no reason to sully what you have done for the grizzly bear by doing something as rash as depriving them of federal protection. Don't give Wyoming, Idaho, and Montana the power to decide this bear's fate; they will choose poorly as they have done historically and then you will be taken as fools, fools which you are not because the USFWS has done so much to protect wild animals and their habitats and must continue to do just that. I thank you for your consideration of my comment, I really do. As a senior in high school it is my hope that one day I can bring as much passion to my future pursuits in the environmental field as you have and protect the natural world in perpetuity from the ever increasing perils of our modern world. Again, thank you for taking my comment and for all that you do. Regards, --Tom Killan	1002	1003					Factor E	As a concerned citizen I would like to voice my concern about the USFWS's proposed delisting of the Yellowstone grizzly bears. How could you release management of this iconic species to the states that forced the USFWS to list them in the first place under the Endangered Species Act? Look what happened to the gray wolf when it was delisted in 2012; the governing body of Wyoming allowed wolves to be shot on sight and just like that years of careful conservation efforts were setback decades. The status of the grizzly bear indirectly protects other species as the ESA safeguards the habitat of not only the grizzly but every other creature who lives alongside it. I can also point to the fact that two major food sources the grizzly bear relies on have drastically plummeted. Whitebark pine seeds and cutthroat trout do not command the numbers they must in order for grizzlies to not go into human inhabited areas and search out alternative food sources, increasing their risk of being shot. Whitebark pine is in fact listed as endangered by the International Union for the Conservation of Nature. I understand the USFWS is looking for a success story. I would argue you have already found some in the American alligator, the black footed ferret, the whooping crane, and the California condor. There is no reason to sully what you have done for the grizzly bear by doing something as rash as depriving them of federal protection. Don't give Wyoming, Idaho, and Montana the power to decide this bear's fate; they will choose poorly as they have done historically and then you will be taken as fools, fools which you are not because the USFWS has done so much to protect wild animals and their habitats and must continue to do just that. I thank you for your consideration of my comment, I really do. As a senior in high school it is my hope that one day I can bring as much passion to my future pursuits in the environmental field as you have and protect the natural world in perpetuity from the ever increasing perils of our modern world. Again, thank you for taking my comment and for all that you do. Regards, --Tom Killan	FWS-R6-ES-2016-0042-0324	
I am writing in opposition to Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife because sufficient consideration has not been given to the providing of corridors for Grizzly Bears in order for the genetic health of the species.	1001						Factor E	I am writing in opposition to Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife because sufficient consideration has not been given to the providing of corridors for Grizzly Bears in order for the genetic health of the species. While there has been some mention of importing bears into the GYE for breeding purposes, this is not the correct policy. At present the Grizzly Bear population if the GYE is cut off from traveling for any purpose of finding suitable habitat for breeding from any other population. If a Grizzly bear were to leave either Yellowstone National Park or Grand Teton National Park for any habitat or breeding needs in order to maintain a viable genetic pool they could or would most likely be killed. And you have not taken sufficient information into consideration regarding our changing climate. Unless you proved safe passage for Grizzly Bears in order to reach viable habitat--which includes food sources necessary to their survival, you should not be opening up Grizzly Bears to trophy hunting. There has never been proven the necessity for the killing of Grizzly bears for sport. Killing to remove a bear from incidents caused by humans will most likely to continue because of human desires to encroach on bear territory. Bears are never the problem. Humans are. Until you provide safe passage for Grizzly bears from one gene pool area to another you should not delist them. More than one agency (as I am almost certain you are aware) has opposed delisting based on science. Unless you wish for so few bears that their population is not viable in YNP or GTNP and the GYE you should refrain from putting the Grizzly bear in the cross hairs of a trophy hunter's rifle. You should be demonstrating that you understand what you will be causing by delisting Grizzly bears. No hunter's life depends on a dead Grizzly bear. Grizzly bears depend now on humans for their lives. No human male or female has proven the need to chop off a head and paws and skin a bear to keep his family warm.	FWS-R6-ES-2016-0042-0381	
Please do not delist the grizzlies. Their habitat has not been recovered to eliminate isolation pockets of bears. They still need all the help they can get to join the bears of the Glacier area. If the food sources are poor for just a couple of years the population easily suffers and less cubs will be born putting them right back in danger. Keep these beautiful creatures in the wild living without fear of hunters. They aren't ready for us to intervene!	1001						Factor E	Please do not delist the grizzlies. Their habitat has not been recovered to eliminate isolation pockets of bears. They still need all the help they can get to join the bears of the Glacier area. If the food sources are poor for just a couple of years the population easily suffers and less cubs will be born putting them right back in danger. Keep these beautiful creatures in the wild living without fear of hunters. They aren't ready for us to intervene!	FWS-R6-ES-2016-0042-0382	

their food sources are disappearing due to climate change and to the Lake Trout, they need to reach other bear populations for biological diversity,	1006	1003					Factor E	Do NOT delist the grizzly bears. They have the lowest reproduction rate of any North American mammal, their food sources are disappearing due to climate change and to the Lake Trout, they need to reach other bear populations for biological diversity, they're important to the Greater Yellowstone ecosystem, to our history and to our culture. I believe this is being fueled by greed and by the desire of some people to have a grizzly bear head as a trophy. Those are not reasons to delist them! Their are sound scientific reason to NOT delist them! Over a million people visit Yellowstone and Grand Teton annually, mostly to see grizzly bears. Don't let the grizzly bears become extinct. If their fate is turned over to the anti-carnivore states of Wyoming, Montana and Idaho this could happen. Wyoming's plan doesn't even allow for a no-hunting corridor around or between the parks. Many bears, mostly sow's with Cubs or older bears who need protection, hang out close to the roads. Without Federal protection these bears will be easy targets for hunters. Some hunters are already targeting specific bears that they intend to kill if they are delisted. Don't let this happen. Look at the statistics. Global warming is real, whatever the cause. It IS effecting the grizzly bear and other animals. That's reason enough not to delist them. We can live with the Bears. People can learn to keep their food inside, to be more careful when they're hiking and to carry bear spray when hiking in grizzly territory. The problems with bears have been caused by humans, not by the Bears! We should be able to deal with it. We're supposed to be the responsible ones. Let's act like it!	FWS-R6-ES-2016-0042-0417	
At present the Grizzly Bear population if the GYE is cut off from traveling for any purpose of finding suitable habitatfor breeding from any other population. If a Grizzly bear were to leave either Yellowstone National Park or Grand Teton National Park for any habitat or breeding needs in order to maintain a viable genetic pool they could or would mostlikely be killed.	1001						Factor E	I am writing in opposition to Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife because sufficient consideration has not been given to the providing of corridors for Grizzly Bears in order for the genetic health of the species. While there has been some mention of importing boars into the GYE for breeding purposes, this is not the correct policy. At present the Grizzly Bear population if the GYE is cut off from traveling for any purpose of finding suitable habitat for breeding from any other population. If a Grizzly bear were to leave either Yellowstone National Park or Grand Teton National Park for any habitat or breeding needs in order to maintain a viable genetic pool they could or would most likely be killed. And you have not taken sufficient information into consideration regarding our changing climate. Unless you proved safe passage for Grizzly Bears in order to reach viable habitat--which includes food sources necessary to their survival, you should not be opening up Grizzly bears to trophy hunting. There has never been proven the necessity for the killing of Grizzly bears for sport. Killing to remove a bear from incidents caused by humans will most likely to continue because of human desires to encroach on bear territory. Bears are never the problem. Humans are. Until you provide safe passage for Grizzly bears from one gene pool area to another you should not delist them. More than one agency (as I am almost certain you are aware) has opposed delisting based on science. Unless you wish for so few bears that their population is not viable in YNP or GTNP and the GYE you should refrain from putting the Grizzly bear in the cross hairs of a trophy hunter's rifle. You should be demonstrating that you understand what you will be causing by delisting Grizzly bears. No hunter's life depends on a dead Grizzly bear. Grizzly bears depend now on humans for their lives. No human male or female has proven the need to chop off a head and paws and skin a bear to keep his family warm.	FWS-R6-ES-2016-0042-0381	
I am writing to OPPOSE the delisting of the grizzly bears of the Greater Yellowstone ecosystem. While I am pleased that grizzly numbers have reached a threshold that they are safer from extinction, we have learned all too well that delisting is "code" for "now we can hunt them for fun".The managed hunting of deer, elk and other prey animals is appropriate and within the context of natural ecosystems. The hunting of carnivores, especially apex carnivores like the grizzly bear is not. It is aberrant, and inappropriate and damages wild places.FWS data on Grizzlies do not show increasing populations, they have only just maintained their numbers for the past 15 years. Declining food sources (white pine bark tree nuts, cutthroat trout, army cutworm moths) result in bears travelling outside the safety of the park, where they would be hunted. These declining food sources also may threaten the recovery of the bears.We are still at a time in Grizzly recovery where every bear is important. There are still too many concerns about their future well being to delist them.	1002	1003	1004				Factor E	I am writing to OPPOSE the delisting of the grizzly bears of the Greater Yellowstone ecosystem. While I am pleased that grizzly numbers have reached a threshold that they are safer from extinction, we have learned all too well that delisting is "code" for "now we can hunt them for fun". The managed hunting of deer, elk and other prey animals is appropriate and within the context of natural ecosystems. The hunting of carnivores, especially apex carnivores like the grizzly bear is not. It is aberrant, and inappropriate and damages wild places. FWS data on Grizzlies do not show increasing populations, they have only just maintained their numbers for the past 15 years. Declining food sources (white pine bark tree nuts, cutthroat trout, army cutworm moths) result in bears travelling outside the safety of the park, where they would be hunted. These declining food sources also may threaten the recovery of the bears. We are still at a time in Grizzly recovery where every bear is important. There are still too many concerns about their future well being to delist them.	FWS-R6-ES-2016-0042-0426	

From human development and conflicts (loss of habitat), to declining numbers of White Bark Pine and cutthroat trout, the species has a number of challenges facing it. In 2015, close to 10% of the total population was euthanized due to conflicts with human. It does not take a PhD to understand that at this rate, in just 10 years, the species would be extinct.	1002	1003				Factor E	I am writing today to express my concerns about the delisting of the Grizzly Bear (<i>Ursus arctos horribilis</i>) from the Endangered Species Act (ESA). While the species might have reached population numbers which warrant delisting, this species is far from being on the road to permanent recovery. The science points to many obstacles which will prevent this species from thriving once removed from the ESA. From human development and conflicts (loss of habitat), to declining numbers of White Bark Pine and cutthroat trout, the species has a number of challenges facing it. In 2015, close to 10% of the total population was euthanized due to conflicts with human. It does not take a PhD to understand that at this rate, in just 10 years, the species would be extinct. As an individual who is employed in the conservation and protection field, all too often I personally witness careless individuals recreating in grizzly habitat who leave food and other odorous items well within the reach of bears. This lack of care by these individuals will only serve to create additional habituated bears which will need to be destroyed, thus further decreasing the population. The US Government has spent millions of dollars to protect and grow this population of bears, and now seem to want to throw that investment away. This is an unwise use of tax dollars. A recent survey indicated that 81% of visitors to the Greater Yellowstone Ecosystem want to see a bear. This data indicates that people vacationing come to Wyoming, and spend thousands of dollars per visit, with the hopes of seeing a bear. With a declining population due to delisting, less people will be afforded the opportunity to see a bear. As the population numbers further decline, one would expect less tourists to visit, resulting in less tourism dollars funneling into an already cash strapped state. In 2015, many of us got to see first hand what happens when an animal, well known by the public, is taken by a hunter. Cecil the Lion was hunted for nothing more than a trophy, in a similar way in which Grizzly Bears would be hunted should they be delisted. The public outcry was tremendous, resulting in the hunter nearly losing his dental practice due to the negative publicity. One must question if any of our elected public officials, outfitters, or local businesses are prepared for the type of public outcry which will happen if certain bears are killed by hunters. One outfitter in Jackson has been quoted as saying he wants bear 399's head on his wall. If the world's most famous Grizzly is allowed to be killed, simply out of spite and for a trophy, the repercussions on Wyoming's tourism industry will be great. I ask you to reconsider the implications of your decisions regarding the Grizzly Bear. This state can not afford for the tourism industry to suffer at the same time the oil industry has essentially gone bankrupt. If Wyoming keeps with it's anti predator mindset, just to appease a minority of the population, this state will suffer grave economic consequences.	FWS-R6-ES-2016-0042-0451	
The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems.	1001					Factor E	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear. No one	FWS-R6-ES-2016-0042-0452	
While their numbers have been slowly increasing, they are not yet a stable population. Being, in effect, cut off from bears in other management and refuge areas by not having protected wildlife corridors between these places, you limit the genetic pool, which contribute to their decline.	1001					Factor E	I am against the delisting of the Grizzlies. As a top tier predator, their presence is necessary to keeping their environment in check. While their numbers have been slowly increasing, they are not yet a stable population. Being, in effect, cut off from bears in other management and refuge areas by not having protected wildlife corridors between these places, you limit the genetic pool, which contribute to their decline. Instead of delisting, we need to not only protect the bears, but people who live in bear country need to learn to coexist with the bears and protected wildlife corridors need to be designated allowing bears to roam safely between the parks, refuges, and reserves. As for making profits from bears, photo safari's tend to make more money than trophy hunting because they can be taken almost all year round, and it doesn't end in death for the animals. Despite "training" and rules against killing female bears with cubs, it still happens because the females may leave their cubs in a tree to go forage for themselves. I have yet to get to visit the Yellowstone area, but I pray that when I do make it there, that the grizzly will be there and thriving.	FWS-R6-ES-2016-0042-0441	

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Because the GYE grizzly bear lives on an ecological island	1001					Factor E	We have lived, worked and recreated in the Greater Yellowstone Ecosystem (GYE) for almost 40 years, meeting working in Yellowstone National Park. We have explored by foot thousands of miles of trails into some of the most breathtaking landscapes on earth, filled with the suite of native wildlife that we so love and respect. We have seen many grizzly bears over the decades and no animal is more powerful in the public's sensibility than the Great Bear. It is our state animal, picked by Montana school children. Our native tribes greatly value the grizzly bear as do all of us who value our wild places and wildlife. The grizzly bear is greater than life; it represents all that we as a people almost lost and what we have preserved. We value our large predators, our carnivores, because they remind us that we share life together in this time and place. They represent the wilderness we almost lost. We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best. Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data. Because the ecosystem is becoming stressed by climate change causing dramatic changes in food supplies needed. Because all foods are not equal. Because grizzlies are being killed at a rate the slowly-reproducing animals cannot tolerate long-term; since 2002 the population has probably declined. Because connectivity with other bears depends upon GYE grizzlies roaming and hunting would preclude that. Because human caused mortality is mostly avoidable and prevention is not stressed enough. Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable. Because sport trophy hunting of grizzly bears would be abhorrent and would reverse recovery. Because tolerant bears that people see around the parks would be the first killed. Because wildlife watchers are ignored by state wildlife agencies and the USFWS. Just look at wolf and bison management. Because tribal interests are ignored by state wildlife agencies. Because wildlife watching brings in far more economically than does hunting in GYE states. Because listing the grizzly as a distinct population segment (DPS) is possibly illegal, because it precludes the bears seeking connectivity. Because the GYE grizzly bear lives on an ecological island. Because politics trumps science every time. We love our grizzly bears and want them protected from nefarious forces bent upon hunting them. USFWS should listen to the public's concerns, listen to opposing scientists and do the right thing. Do not delist the grizzly bear.	FWS-R6-ES-2016-0042-0422	

The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been.	1006					Factor E	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife, primarily grizzlies and wolves. Allowing a "trophy" hunt, targeting the park grizzlies is not only an easy hunt, but not a hunt at all, no less an ambush of the species. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, even resistant to managing a species of high importance to the non-hunting public and/or the federal government (i.e. - Gray wolves). In addition, even with	FWS-R6-ES-2016-0042-0463	
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Grizzlies in the GYE are facing catastrophic losses to several of their key food sources, such as whitebark pine and cutthroat trout. The service's recent research on whitebark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy whitebark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals.	1002	1003				Factor E	Grizzlies in the GYE are facing catastrophic losses to several of their key food sources, such as whitebark pine and cutthroat trout. The service's recent research on whitebark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy whitebark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals. Moreover, grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary. Furthermore, the USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. Additionally, the USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). USFWS's proposal also does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. Due to all of these unknowns regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population, I believe the better suited and pragmatic approach of waiting five years to see how the population is responding to these threats should be taken instead.	FWS-R6-ES-2016-0042-5093	
Uncertainty about the ongoing unpredictable effects of climate change and how that unfolding story will influence the food choices and survival of the Grizzly Bears.	1006	1000				Factor E	I am writing to implore you to stop the proposed delisting of the Grizzly Bear in the Greater Yellowstone Ecosystem from the Federal List of Endangered and Threatened Wildlife. The reported facts and research, compiled by different researchers, is conflicting, to say the least, in regards to defining the current Grizzly Bear population as recovered. Facts will always be conflicting as scientists view their data through their lens of their inquiry. We all have a way we see the world and it profoundly influences the actions we take. Call it the uncertainty principle or the observer effect from quantum physics. Although people try to do their best, I believe it is not possible to be completely objective in how they interpret their research. That's why it's important to listen to other's perspectives and take into consideration what they, too, are observing. So what we are left with is always the intention and motivation of those interpreting the data. That's where the true wisdom comes in. Delisting is not feasible or desirable at this time for many reasons. Grave uncertainty being the main one. Uncertainty about the ongoing unpredictable effects of climate change and how that unfolding story will influence the food choices and survival of the Grizzly Bears. Uncertainty about the increased pressures of expanding human populations on the Grizzly families as more and more people move west, encroaching on their territory. That increased human presence, gobbling up the land, is only pressuring the Grizzlies into closer human contact, year by year. And lastly, the uncertainty of the unpredictable behavior of humans who seek to kill a Grizzly for sport or vengeance if Grizzly Bears are no longer protected under federal law. Threats have already been made by some to seek out and intentionally kill one of the most famous Grizzly Bear mothers, 399, in Grand Teton National Park. Yes, progress has been made, but the conditions on the ground have changed dramatically since the IGBC was set in motion almost three decades ago. It is important to base this decision to potentially delist on the ground-truthing of this present century, not in goals of past decades when this Committee was first given this honorable task of recovering the at-risk populations. It is important for you to at least consider that it may never be wise or safe to delist the Grizzly Bear. And that does not constitute failure. That represents wisdom. I thank you for your service in regards to the leadership that has been entrusted to you, by all of us, the Public trust, to safeguard the well-being of our Greater Yellowstone Grizzly Bear population. Please don't take hasty actions to delist them, based on short-term reasons such as procedure, protocol or personal legacy. I implore you to consider the long-view, which is solely your responsibility, and in your hands, as wise leaders and elders. Thank you for your crucial consideration to halt delisting process at this time. May it be so. Thank you. Lyn Dalebout	FWS-R6-ES-2016-0042-5132	

Moreover, grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary.	1002						Factor E	Grizzlies in the GYE are facing catastrophic losses to several of their key food sources, such as whitebark pine and cutthroat trout. The service's recent research on whitebark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy whitebark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals. Moreover, grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary. Furthermore, the USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. Additionally, the USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). USFWS's proposal also does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. Due to all of these unknowns regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population, I believe the better suited and pragmatic approach of waiting five years to see how the population is responding to these threats should be taken instead.	FWS-R6-ES-2016-0042-5093	
Furthermore, the USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. Additionally, the USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm.	1001						Factor E	Grizzlies in the GYE are facing catastrophic losses to several of their key food sources, such as whitebark pine and cutthroat trout. The service's recent research on whitebark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy whitebark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals. Moreover, grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary. Furthermore, the USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. Additionally, the USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). USFWS's proposal also does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. Due to all of these unknowns regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population, I believe the better suited and pragmatic approach of waiting five years to see how the population is responding to these threats should be taken instead.	FWS-R6-ES-2016-0042-5093	
DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes.	1002						Factor E	THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain listed. Thank you	FWS-R6-ES-2016-0042-5148	

As noted by top scientists, "Grizzly bears face multiple threats to persistence including the loss of their primary food resources. Currently, whitebark pine seeds, native cutthroat trout, huckleberries, army cutworm moths, elk and bison are either declining and/or are expected to decline in the foreseeable future as a result of habitat loss, climate change, drought, invasive species and other anthropogenic causes."	1002	1003	1004	1005	1006	Factor E	I oppose de-listing the Grizzly Bear population of Yellowstone from the Federal List of Endangered and Threatened Wildlife. These iconic animals are still vulnerable, genetically isolated and will likely be intensely trophy-hunted. In addition to their utility value for preservation of biodiversity and to ecological systems as top predators, these animals have inherent existence value. As noted by top scientists, "Grizzly bears face multiple threats to persistence including the loss of their primary food resources. Currently, whitebark pine seeds, native cutthroat trout, huckleberries, army cutworm moths, elk and bison are either declining and/or are expected to decline in the foreseeable future as a result of habitat loss, climate change, drought, invasive species and other anthropogenic causes." Please do not de-list the Grizzly.	FWS-R6-ES-2016-0042-5160	
Moreover, climate change has already severely impacted traditional food sources for GYA bears with the massive die off of white bark pines. Add to that the illegal introduction of lake trout into Y-stone Lake and the subsequent reduction in historic cutthroat trout spawning runs and the future food supplies for grizzlies in the GYA will probably lead to even more conflicts since both cattle and sheep graze public and private lands in the GYA -- and the Forest Service shows no signs of significantly reducing livestock grazing to protect grizzlies.	1006	1002	1003			Factor E	I want to go on record as strongly OPPOSING delisting for GYA grizzly bears from endangered species Act protections. As a 45-year resident of Montana I am very familiar with the Greater Yellowstone Area, its fish and wildlife. Also very familiar with the on-going development in and around Yellowstone, which shows no signs of slowing, let alone reversing the trend of putting ever more humans into the remnants of grizzly habitat and the predictable unfortunate outcome of bear-human interactions, which almost always end in grizzly mortality. I have personally backpacked into and camped out in every wilderness area in Montana, including into the Bob Marshall's famous Chinese Wall, all through Glacier as well as significant time in Yellowstone's backcountry. Truth is, I've seen exactly ONE grizzly bear during all those decades in the wild -- and that was in Glacier National Park. We do not hike with bear bells or other noise-makers on, so I'm quite sure we didn't "spook" any bears away on the hundreds of miles of trails hiked. I also skied across the entire length of both the Anaconda-Pintlar Wilderness (1983) and the Tobacco Root range (1997) and, despite it being early spring when the bears should have been coming out of hibernation, saw not one bear. Consequently, I'm finding it a little hard to believe we now have a "recovered" grizzly population in the Greater Yellowstone area -- or Montana, for that matter. The grizzlies in the Cabinet-Yaak area have been struggling for decades, despite "recovery" attempts and are primarily impacted by habitat loss due to logging and development, with the primary problem being human-caused mortality. It's worth considering the Cabinet-Yaak example because there is currently political pressure to increase logging throughout Montana, including in the GYA (Hebgen Lake area, specifically). Moreover, climate change has already severely impacted traditional food sources for GYA bears with the massive die off of white bark pines. Add to that the illegal introduction of lake trout into Y-stone Lake and the subsequent reduction in historic cutthroat trout spawning runs and the future food supplies for grizzlies in the GYA will probably lead to even more conflicts since both cattle and sheep graze public and private lands in the GYA -- and the Forest Service shows no signs of significantly reducing livestock grazing to protect grizzlies. Likewise, climate change is driving wildfires due to lower snowpack, shorter, warmer winters, earlier springs, drought, and much higher summer temperatures. While the wildfires do not "destroy" forests as some claim, they certainly do affect grizzly habitat. Given the incredibly small "secure zones" for grizzlies, losing the forest cover in those areas to wildfire forces grizzlies into other areas and, again, more conflict with humans and livestock. Put it all together -- along with the predictions for increasing, not decreasing, temperatures -- and it should be obvious that grizzly bears do not have a smooth ride into the future. Toss in the already proposed hunting seasons in WY, MT and ID -- and the certainty that more bears will be killed if delisted -- and the conclusion should be inescapable that it is not yet the time to remove grizzlies from Endangered Species Act protections. Thanks for the opportunity to comment and I hope you're listening to the public on this issue. It doesn't take long to go back through the comments online to see that virtually all of them are against delisting at this time. As someone who actually lives in Montana and knows its wilderness, wildlife and fish, you will, I am sure, hope that you'll take my concerns into serious	FWS-R6-ES-2016-0042-5223	
There is no certainty that the food sources currently available to the grizzly will continue to be available in the near future. In fact, it is highly likely that the food sources currently available to the grizzly will decline over the very near future. Further, there is an ever-increasing threat to the bear's habitat where development is encroaching into wild places causing conflict between bears and humans. For example, when bears are unable to access the food sources that have become scarce, specifically white bark pine nuts in fall, during the hunting season, we have seen a notable increase in bear/human conflicts. Should bears be removed from the ESA, they will be vulnerable as they feed on the army cutworm moth in late summer making large numbers of them.	1000	1002	1004			Factor E	I am writing to express my opposition to the delisting of the grizzly bear from protection under the the Endangered Species Act. I oppose this because based on the scientific data I have reviewed. Specifically, in Yellowstone Ecosystem, there are several critical issues that adversely affect the availability of food sources upon which the grizzly bear relies. These uncertainties are primarily the result of ongoing climate change in the ecosystem. I am currently associated with Montana State University where I study ecosystem responses to climate. There is no certainty that the food sources currently available to the grizzly will continue to be available in the near future. In fact, it is highly likely that the food sources currently available to the grizzly will decline over the very near future. Further, there is an ever-increasing threat to the bear's habitat where development is encroaching into wild places causing conflict between bears and humans. For example, when bears are unable to access the food sources that have become scarce, specifically white bark pine nuts in fall, during the hunting season, we have seen a notable increase in bear/human conflicts. Should bears be removed from the ESA, they will be vulnerable as they feed on the army cutworm moth in late summer making large numbers of them. I find the proposal to designate the bears of the GYE as a distinct population segment to be arbitrary and capricious. The GYE population will most certainly decline as their genetic diversity stagnates. It is irresponsible not to encourage continuity between the bears of the GYE and those of the Northern Continental Divide population and Cabinet Yak populations. The problem remains that there is not a population of grizzlies in the Central Idaho Wilderness. In addition to my academic career, I own a small tour business in Gardiner, Montana, Wild Bear Adventures. One of the facts that our clients always find interesting is that the grizzly bear is the slowest reproducing mammal in North America. When there are conflicts between humans and bears and a female bear is removed from the ecosystem, her future reproductive potential is an exponential loss. Further, the success of my business relies on a healthy bear population, one that has not been impacted by hunting which, as the data show is the case with wolves, they are comfortable occupying all of their habitat, increasing the chances of being viewed by visitors and increasing our opportunity to share information with the public. Therefore, for these and many other reasons too numerous for me to mention here, do not remove the grizzly bear from protection under the Endangered Species Act.	FWS-R6-ES-2016-0042-5217	

Likewise, climate change is driving wildfires due to lower snowpack, shorter, warmer winters, earlier springs, drought, and much higher summer temperatures. While the wildfires do not "destroy" forests as some claim, they certainly do affect grizzly habitat. Given the incredibly small "secure zones" for grizzlies, losing the forest cover in those areas to wildfire forces grizzlies into other areas and, again, more conflict with humans and livestock.	1006					Factor E	I want to go on record as strongly OPPOSING delisting for GYA grizzly bears from Endangered Species Act protections. As a 46-year resident of Montana I am very familiar with the Greater Yellowstone Area, its fish and wildlife. Also very familiar with the on-going development in and around Yellowstone, which shows no signs of slowing, let alone reversing the trend of putting ever more humans into the remnants of grizzly habitat and the predictable unfortunate outcome of bear-human interactions, which almost always end in grizzly mortality. I have personally backpacked into and camped out in every wilderness area in Montana, including into the Bob Marshall's famous Chinese Wall, all through Glacier as well as significant time in Yellowstone's backcountry. Truth is, I've seen exactly ONE grizzly bear during all those decades in the wild -- and that was in Glacier National Park. We do not hike with bear bells or other noise-makers on, so I'm quite sure we didn't "spook" any bears away on the hundreds of miles of trails hiked. I also skied across the entire length of both the Anaconda-Pintlar Wilderness (1983) and the Tobacco Root range (1997) and, despite it being early spring when the bears should have been coming out of hibernation, saw not one bear. Consequently, I'm finding it a little hard to believe we now have a "recovered" grizzly population in the Greater Yellowstone area -- or Montana, for that matter. The grizzlies in the Cabinet-Yaak area have been struggling for decades, despite "recovery" attempts and are primarily impacted by habitat loss due to logging and development, with the primary problem being human-caused mortality. It's worth considering the Cabinet-Yaak example because there is currently political pressure to increase logging throughout Montana, including in the GYA (Hebgen Lake area, specifically). Moreover, climate change has already severely impacted traditional food sources for GYA bears with the massive die off of white bark pines. Add to that the illegal introduction of lake trout into Y-stone Lake and the subsequent reduction in historic cutthroat trout spawning runs and the future food supplies for grizzlies in the GYA will probably lead to even more conflicts since both cattle and sheep graze public and private lands in the GYA -- and the Forest Service shows no signs of significantly reducing livestock grazing to protect grizzlies. Likewise, climate change is driving wildfires due to lower snowpack, shorter, warmer winters, earlier springs, drought, and much higher summer temperatures. While the wildfires do not "destroy" forests as some claim, they certainly do affect grizzly habitat. Given the incredibly small "secure zones" for grizzlies, losing the forest cover in those areas to wildfire forces grizzlies into other areas and, again, more conflict with humans and livestock. Put it all together -- along with the predictions for increasing, not decreasing, temperatures -- and it should be obvious that grizzly bears do not have a smooth ride into the future. Toss in the already proposed hunting seasons in WY, MT and ID -- and the certainty that more bears will be killed if delisted -- and the conclusion should be inescapable that it is not yet the time to remove grizzlies from Endangered Species Act protections. Thanks for the opportunity to comment and I hope you're listening to the public on this issue. It doesn't take long to go back through the comments online to see that virtually all of them are against delisting at this time. As someone who actually lives in Montana and loves its wilderness, wildlife and fishery, as well as the job here that you'll take my concerns into serious	FWS-R6-ES-2016-0042-5223	
I find the proposal to designate the bears of the GYE as a distinct population segment to be arbitrary and capricious. The GYE population will most certainly decline as their genetic diversity stagnates. It is irresponsible not to encourage continuity between the bears of the GYE and those of the Northern Continental Divide population and Cabinet Yak populations. The problem remains that there is not a population of grizzlies in the Central Idaho Wilderness.	1001					Factor E	I am writing to express my opposition to the delisting of the grizzly bear from protection under the Endangered Species Act. I oppose this because based on the scientific data I have reviewed. Specifically, in Yellowstone Ecosystem, there are several critical issues that adversely affect the availability of food sources upon which the grizzly bear relies. These uncertainties are primarily the result of ongoing climate change in the ecosystem. I am currently associated with Montana State University where I study ecosystem responses to climate. There is no certainty that the food sources currently available to the grizzly will continue to be available in the near future. In fact, it is highly likely that the food sources currently available to the grizzly will decline over the very near future. Further, there is an ever-increasing threat to the bear's habitat where development is encroaching into wild places causing conflict between bears and humans. For example, when bears are unable to access the food sources that have become scarce, specifically white bark pine nuts in fall, during the hunting season, we have seen a notable increase in bear/human conflicts. Should bears be removed from the ESA, they will be vulnerable as they feed on the army cutworm moth in late summer making large numbers of them. I find the proposal to designate the bears of the GYE as a distinct population segment to be arbitrary and capricious. The GYE population will most certainly decline as their genetic diversity stagnates. It is irresponsible not to encourage continuity between the bears of the GYE and those of the Northern Continental Divide population and Cabinet Yak populations. The problem remains that there is not a population of grizzlies in the Central Idaho Wilderness. In addition to my academic career, I own a small tour business in Gardiner, Montana, Wild Bear Adventures. One of the facts that our clients always find interesting is that the grizzly bear is the slowest reproducing mammal in North America. When there are conflicts between humans and bears and a female bear is removed from the ecosystem, her future reproductive potential is an exponential loss. Further, the success of my business relies on a healthy bear population, one that has not been impacted by hunting which, as the data show is the case with wolves, they are comfortable occupying all of their habitat, increasing the chances of being viewed by visitors and increasing our opportunity to share information with the public. Therefore, for these and many other reasons too numerous for me to mention here, do not remove the grizzly bear from protection under the Endangered Species Act.	FWS-R6-ES-2016-0042-5217	
The theory that bears can adapt to development and the resulting changes in food sources is not supported by the evidence. Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, reasonable resilience, and availability throughout the habitat. The GYE grizzlies are an "island population". This means that they are adapted to live and thrive within a specific geographic range. Substantial threats or changes to that habitat would likely pressure the bears to try and relocate, but they cannot successfully do so. The Greater Yellowstone Ecosystem is the environment to which they have adapted over eons. There is not another environment to which they could relocate and remain a viable species. Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability.	1002	1003	1001			Factor E	Greetings, I wish to offer the following comment regarding the intended rule change to remove the Greater Yellowstone Ecosystem population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I am against this proposed de-listing. De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. The theory that bears can adapt to development and the resulting changes in food sources is not supported by the evidence. Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, reasonable resilience, and availability throughout the habitat. The GYE grizzlies are an "island population". This means that they are adapted to live and thrive within a specific geographic range. Substantial threats or changes to that habitat would likely pressure the bears to try and relocate, but they cannot successfully do so. The Greater Yellowstone Ecosystem is the environment to which they have adapted over eons. There is not another environment to which they could relocate and remain a viable species. Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability. If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it. Please do not de-list this special population of bear.	FWS-R6-ES-2016-0042-5241	

Four specific foods have been particularly noted: seeds of the white bark pine. The seeds of this pine represents a high-fat highdiet for the bears, growing at high altitudes is also kept bears from human contact to a great degree. But only 20% of the white bark pine that existed 20 years ago still exists today.	1002					Factor E	delisting of Yellowstone grizzlies is very premature as there has been no specific study of the impacts upon the grizzlies of Yellowstone that has occurred as the result of reduction of specialized foods primarily contributing to the success of their recovery. Four specific foods have been particularly noted: seeds of the white bark pine. The seeds of this pine represents a high-fat high diet for the bears, growing at high altitudes is also kept bears from human contact to a great degree. But only 20% of the white bark pine that existed 20 years ago still exists today. Bear now forage at lower altitudes, at greater dangers of human conflict. Agriculture has reduced the moths of the cutworm moth. This food, up to 72% fat, has been called a "bear superfood", by internationally know expert David Mattson, PhD. But this food source has dropped precipitously as result of insecticides used by farmers. Introduction of piscivorous non-native fish into Yellowstone lake has resulted in drastic reduction of cutthroat trout - yet another of the main 3 or 4 high-fat and protein sources that support bear reproductivity, which in the best of times, is still remarkably slow. The usfws should listen to the best science rather than wishful thinking, greed, and hand-waving, touchy-feely estimates and wild-ass guesses. The USFWS is about to precipitate another catastrophic collapse of Yellowstone's grizzlies, and those who bring it about will go down in history.... literally, they will go down...	FWS-R6-ES-2016-0042-5279	
Bear now forage at lower altitudes, at greater dangers of human conflict. Agriculture has reduced the moths of the cutworm moth. This food, up to 72% fat, has been called a "bear superfood", by internationally know expert David Mattson, PhD. But this food source has dropped precipitously as result of insecticides used by farmers. Introduction of piscivorous non-native fish into Yellowstone lake has resulted in drastic reduction of cutthroat trout - yet another of the main 3 or 4 high-fat and protein sources that support bear reproductivity, which in the best of times, is still remarkably slow.	1003					Factor E	delisting of Yellowstone grizzlies is very premature as there has been no specific study of the impacts upon the grizzlies of Yellowstone that has occurred as the result of reduction of specialized foods primarily contributing to the success of their recovery. Four specific foods have been particularly noted: seeds of the white bark pine. The seeds of this pine represents a high-fat high diet for the bears, growing at high altitudes is also kept bears from human contact to a great degree. But only 20% of the white bark pine that existed 20 years ago still exists today. Bear now forage at lower altitudes, at greater dangers of human conflict. Agriculture has reduced the moths of the cutworm moth. This food, up to 72% fat, has been called a "bear superfood", by internationally know expert David Mattson, PhD. But this food source has dropped precipitously as result of insecticides used by farmers. Introduction of piscivorous non-native fish into Yellowstone lake has resulted in drastic reduction of cutthroat trout - yet another of the main 3 or 4 high-fat and protein sources that support bear reproductivity, which in the best of times, is still remarkably slow. The usfws should listen to the best science rather than wishful thinking, greed, and hand-waving, touchy-feely estimates and wild-ass guesses. The USFWS is about to precipitate another catastrophic collapse of Yellowstone's grizzlies, and those who bring it about will go down in history.... literally, they will go down...	FWS-R6-ES-2016-0042-5279	
With development increasing in the Northern Rockies region, public lands are critical for providing essential secure habitat for grizzly bears into the future. The agencies in charge of our public lands have an obligation to ensure that an iconic species like the grizzly bear can continue to thrive. However, the U.S. Forest Service has not revealed when it will amend the management plans of the six national forests surrounding Yellowstone to provide for adequate habitat protections for grizzly bears post-delisting or when this process would be available for public review.						Factor E	Thank you for the opportunity to comment on potential Yellowstone Grizzly de-listing. Prairie Hills Audubon Society wants to be assured that the states and federal land management agencies, including the U.S. Forest Service, will manage bears and their habitat in a way that ensures a healthy and expanding grizzly bear population into the future. Prairie Hills Audubon Society is seriously concerned that the U.S. Fish and Wildlife Service (FWS) does not have all the required information and assurances finalized to make an informed decision. Specifically, the Endangered Species Act requires that, before delisting can occur, among other things, there are adequate regulatory mechanisms in place to ensure that the grizzly bear does not slip back towards extinction. These regulatory mechanisms are the responsibility of the states of Wyoming, Montana and Idaho and the appropriate federal land management agencies. However, the necessary management plans that provide these commitments have not been finalized and provided to us by the FWS for review with the proposal. Wyoming has yet to finalize a revised grizzly bear state management plan, and the recently completed draft is not consistent with statements made in the delisting proposal. It is unclear if, let alone when, Idaho or Montana will update their management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the adequate regulatory mechanisms that are required. With development increasing in the Northern Rockies region, public lands are critical for providing essential secure habitat for grizzly bears into the future. The agencies in charge of our public lands have an obligation to ensure that an iconic species like the grizzly bear can continue to thrive. However, the U.S. Forest Service has not revealed when it will amend the management plans of the six national forests surrounding Yellowstone to provide for adequate habitat protections for grizzly bears post-delisting or when this process would be available for public review. Prairie Hills Audubon Society encourages the FWS to continue to work with the state grizzly bear management agencies, tribal agencies and state and federal land management agencies that will be responsible for grizzly bears post delisting on: - Ensuring that robust protections remain in place for the Yellowstone grizzly bear core population including strict limits on mortality and strong habitat protections within the Primary Conservation Area (PCA), the area identified to remain the most protective for grizzly bears after delisting; - Giving Yellowstone grizzly bears the opportunity to continue to expand their range and reconnect with other grizzly bear populations to the north as well as allow for Yellowstone grizzly bears to expand into the Bitterroot Recovery Zone, currently absent of a grizzly bear population; - Expanding and strengthening habitat protections currently only allocated to the PCA into the larger Demographic Monitoring Area and further into areas identified as important to linkage between grizzly bear populations; - Continuing and strengthening programs that proactively minimize conflicts between bears and people thereby improving social tolerance and public acceptance for the bears throughout their range; and, - Working together to broaden partnerships and secure long term adequate funding for grizzly bear conservation and recovery into the future. In summary, Prairie Hills Audubon Society opposes the delisting of grizzly bears in the Yellowstone Ecosystem and request that the U.S.	FWS-R6-ES-2016-0042-5311	

The USFWS conclusions that climate change is not a threat to the bears, and will not be in the future, overlooks the scientific facts regarding the grizzly's food sources. All the grizzly bears' major food sources are in decline: the whitebark pine due to pine beetle infestation, an infestation caused by our warming world, the cutworm moth, and the cutthroat trout which are under threat from the invasive lake trout. The US FWS argues that there are alternate sources of food available to the grizzly bears, but has not shown any scientific data that would even begin to establish that those purported alternative sources of food have the necessary nutrition to meet the grizzly bears' dietary needs.	1006	1002	1004	1003		Factor E	I strongly oppose the US FWS' proposal to delist the Yellowstone grizzly bear and strip the species' ESA protections. I am a third generation Wyomingite, and a US citizen. I am concerned that Wyoming sees the delisting proposal as an invitation to begin hunting the bears as trophies. The grizzly bears have the greatest value to Americans, and all the public, alive. The US FWS holds wildlife in the public trust for the enjoyment of all, and if hunters are killing grizzlies for trophies, instead of me being able to enjoy seeing living bears, hunters will be hanging bear skins on their wall. Bears do not belong on walls, they belong in the ecosystem. Wyoming has already started a public comment period, which ends of April 14, 2016, to begin a trophy hunt of grizzly bears. This does not show an intent to protect the bears and ensure their continued survival. Wyoming's management plan is just a road map to killing bears, and a copy of it is attached hereto. This management plan demonstrates how important it is to leave grizzlies on the endangered species list. The USFWS conclusions that climate change is not a threat to the bears, and will not be in the future, overlooks the scientific facts regarding the grizzly's food sources. All the grizzly bears' major food sources are in decline: the whitebark pine due to pine beetle infestation, an infestation caused by our warming world, the cutworm moth, and the cutthroat trout which are under threat from the invasive lake trout. The US FWS argues that there are alternate sources of food available to the grizzly bears, but has not shown any scientific data that would even begin to establish that those purported alternative sources of food have the necessary nutrition to meet the grizzly bears' dietary needs. In 2011 grizzly bears were placed back on the endangered species list because this agency failed to consider threats to the grizzly bears food sources, and that scientific uncertainty was not a sufficient rationale for failing to evaluate possible risks to a species the FWS proposed to delist and remove See, from ESA protections. See, Greater Yellowstone Coalition, Inc. v. Servheen, 665 F.3d 1015, (9th Cir. 2011), a copy of which is also attached hereto. This holding of Greater Yellowstone Coalition, Inc. v. Servheen is still applicable today, as we continue to face the increased effects of global warming, and the grizzly bears' food sources continue to fall under that threat. The US FWS would be wise to review the Court's decision, and the scientific resources cited therein, before taking the rash action of delisting the grizzly bear. Instead of delisting the grizzly bear, the US FWS should be seeking areas to reestablish the grizzly populations, which is a goal that the US FWS cited in its 2011 status review of grizzly bears. Additionally, the US FWS cited in that same review, an expectation that the Continental Divide bears and the Yellowstone bears would naturally connect "in the near future", however, that will not come to pass if trophy hunters are allowed to kill bears that leave the national parks systems. The US FWS has these expectations based on outdated research, and without taking into consideration the massive detrimental effects a delisting will have on the grizzly bear population. If the delisting happens, bears that strike out in order to seek new ecosystems will leave the protections of the national parks, and be subject to hunting, ensuring that these brave bears cannot aid in the continued survival of the species. There are resources for the bears, and ecosystems to connect them, but the bears will never get there if we allow hunters to kill the bears once they leave the national parks. There is a	FWS-R6-ES-2016-0042-0524	
Pressures such as shifting food sources and climate change are perhaps two new threats that weren't considered years ago, but they are very much part of the reality today.	1000	1006				Factor E	See attached file(s). In the attached file, I have comments on the following docket number: Number FWS-R6-ES-2016-0042. Attachments Comments on Delisting Grizzly Bears.20160331	FWS-R6-ES-2016-0042-0540	
Another problem endangering the grizzly bears is habitat and food. According to Yellowstone, there has been a 15-20 percent loss of their genetic variability. This could cause "inbreeding and worsen problems stemming from food loss, habitat loss and conflicts with people. A lot of these problems have to do with increased interaction between bears and humans.	1001	1000				Factor E	The United States Fish and Wildlife Service proposes to remove the Greater Yellowstone Ecosystem (GYE) Grizzly Bears from the Endangered and Threatened Wildlife list. Also, the affected states promise to continue to ensure the grizzly bear population remains. I think that delisting the Grizzly Bears would only work if there were policies that were strictly enforced to ensure the continuation of the grizzly bear population. The major worry is that human caused mortality will quickly exceed the grizzly bear reproduction. Grizzly bear reproduction is a slow process and about half the cubs do not survive. Based on the fact that they are slow reproducers I believe the bears should stay on the endangered list for at least 5-10 more years and then maybe slowly introduce different policies that may allow regulated hunting again. According to an article in the national geographic that addresses this issue, it is believed that if the very states that failed to ensure the populations of grizzly bears gain control again, the population will quickly dwindle. Also, it is believed that this means the laws implanted will not be enforced well by these states. According to the article, the bears are worth a billion annually alive than dead, so it is better to keep the hunting levels down. Another problem endangering the grizzly bears is habitat and food. According to Yellowstone, there has been a 15-20 percent loss of their genetic variability. This could cause "inbreeding and worsen problems stemming from food loss, habitat loss and conflicts with people. A lot of these problems have to do with increased interaction between bears and humans. Dr. Michael Gibeau has done a lot of research on the correlation between increased number of roads and bear mortality. Based on this information, bears are greatly affected by the amount of human interaction and can definitely stress them out. I believe that the best way to conserve the bears is to conserve their habitat and try to decrease the human interaction (for example by building fewer roads through their homes). In conclusion I think that the bears should not be delisted, at least not right now. When thinking about laws as a nation we must remember there will always be people who break the law. Therefore delisting them can cause people to break the rules more and more, as the laws become increasingly lenient.	FWS-R6-ES-2016-0042-0569	

If delisting occurs there will be pressures to allow trophy hunting and more pressure to kill nuisance bears. All of this will decrease the population numbers and will curtail any movement of bears of the GYE to those of the NCDE preventing any genetic carry over. It is not improbable then that up to 100 bears could be killed by such action of delisting; meaning any progress made would be short lived. Grizzlies of the GYE will become more isolated basically resigning this iconic bear to the status quo at best, which in and of itself is a death sentence unless bears would be placed back under protection on behalf of the ESA.	1001					Factor E	See attached file(s). In the attached file, I have comments on the following docket number: Number FWS-R6-ES-2016-0042. Attachments Comments on Delisting Grizzly Bears.20160331	FWS-R6-ES-2016-0042-0540	
Housing, retailing, and energy development in Yellowstone's surrounding counties have been accelerating in the past decade. Additionally, the bears' major food sources - such as white bark pine nuts, cutthroat trout, and ungulate meat - are becoming threatened. The Grizzlies' are taking measures to compensate for this reduction in food, but it proves to be difficult with less livable area. Food shortage leads for Grizzlies to become hungrier and more desperate for food. Bear advocate Louisa Wilcox said, "when bears traverse the landscape looking for food, they bump into people at high rates, and when they bump into people, they tend to die at high rates." The bears' long-term could be in jeopardy because of less habitat and less food. Although the GYE Grizzlies' numbers are up now, delisting them could completely undo the progress of the past 40 years. The habitat encroachment and increased human activities around the Grizzlies' territory is also a cause for not delisting the animal. Counties surrounding National Parks are shown to have high rates of growth and Yellowstone is no exception. According to Yellowstone Park, "20 counties surrounding the Greater Yellowstone jumped a whopping 14 percent in population in the last decade." An increase in the human population will call for more roads, more houses, more materials gathered. All of these factors will leave less habitat space for bears, while increasing the likelihood of human and bear interactions, which, unfortunately, more often than not leads to a dead bear. Bears are also very opportunistic and will eat whatever food it can get its paws on. The problem with this is that once bears get into contact with food from humans, whether it is waste, bird feed or gardens, they will often return for more. Again, increasing the contact between humans and bears.	1002	1003	1005			Factor E	The Greater Yellowstone Ecosystem (GYE) Grizzly Bear is an intelligent and emotional creature that is crucial to Yellowstone's and its surrounding areas' ecosystems. The population numbers alone show that the bear has more than tripled its numbers from the time the GYE Grizzly Bear was added to the Endangered Species List in 1975, growing from less than 200 to close to 800. This population increase is a huge improvement and cause for acknowledgement; however, the numbers alone do not tell the full story. Housing, retailing, and energy development in Yellowstone's surrounding counties have been accelerating in the past decade. Additionally, the bears' major food sources - such as white bark pine nuts, cutthroat trout, and ungulate meat - are becoming threatened. The Grizzlies' are taking measures to compensate for this reduction in food, but it proves to be difficult with less livable area. Food shortage leads for Grizzlies to become hungrier and more desperate for food. Bear advocate Louisa Wilcox said, "when bears traverse the landscape looking for food, they bump into people at high rates, and when they bump into people, they tend to die at high rates." The bears' long-term could be in jeopardy because of less habitat and less food. Although the GYE Grizzlies' numbers are up now, delisting them could completely undo the progress of the past 40 years. The habitat encroachment and increased human activities around the Grizzlies' territory is also a cause for not delisting the animal. Counties surrounding National Parks are shown to have high rates of growth and Yellowstone is no exception. According to Yellowstone Park, "20 counties surrounding the Greater Yellowstone jumped a whopping 14 percent in population in the last decade." An increase in the human population will call for more roads, more houses, more materials gathered. All of these factors will leave less habitat space for bears, while increasing the likelihood of human and bear interactions, which, unfortunately, more often than not leads to a dead bear. Bears are also very opportunistic and will eat whatever food it can get its paws on. The problem with this is that once bears get into contact with food from humans, whether it is waste, bird feed or gardens, they will often return for more. Again, increasing the contact between humans and bears. I oppose the proposed rule to delist the Greater Yellowstone Ecosystem Grizzly Bear because it will inevitably lead to the re-addition of the bear to the Endangered Species List. http://news.nationalgeographic.com/2015/10/151001-grizzly-bears-animals-science-conservation-nation/ http://www.counterpunch.org/2016/01/01/delisting-the-grizzly-a-recipe-for-more-bear-deaths/ http://www.yellowstonepark.com/grizzly-bears-endangered/	FWS-R6-ES-2016-0042-0571	
Climate changes, temperature increases, loss of white bark pine and other critical habitat components are totally unpredictable and are happening exponentially faster than predicted or considered. The apex predators are unable to adapt to those changes and will all be lost within a very short period of time. In the mean time we need to do everything humanly possible to provide them a bridge that helps them make the necessary adjustments, if that will even be possible. Humans need to stay out of areas that the grizzly needs for survival. If a bear-human conflict should occur I want to see nonlethal means used, prior to lethal removal.	1006	1002				Factor E	Please do not remove (delist) the grizzly bear from the protections stated in the Endangered Species Act. Even though it may appear that the grizzly has met the standard for the delisting rule, which opens the door for legal hunting, that is not the appropriate means of population control. The long term effects of the proposed delist control measures are tenuous at best. Climate changes, temperature increases, loss of white bark pine and other critical habitat components are totally unpredictable and are happening exponentially faster than predicted or considered. The apex predators are unable to adapt to those changes and will all be lost within a very short period of time. In the mean time we need to do everything humanly possible to provide them a bridge that helps them make the necessary adjustments, if that will even be possible. Humans need to stay out of areas that the grizzly needs for survival. If a bear-human conflict should occur I want to see nonlethal means used, prior to lethal removal. Travelers from all over the world visit the Yellowstone region in hopes of seeing and photographing the apex predators. That brings a lot of revenue into the local economies surrounding the Yellowstone region. It brings a lot of good will with it as well. Grizzly bears are not just a treasure of the state of Montana and the United States, they are a treasure of this planet and all of the people and children of future generations, and we need to start thinking in the bigger sense using an expanded perspective that we are the stewards of this planet and all the species who inhabit it. Please do the right thing and do not delist the grizzly, and, do not allow hunting of it for at least (5) five years post-delisting. Thank you for considering my comments and concerns.	FWS-R6-ES-2016-0042-0614	

Delisting the Greater Yellowstone grizzlies now would be premature. Key issues are: One of the slowest reproductive rates among land mammals, small average litter size, and long interval between littersChanges in the food supply: The whitebark pine forest is already 70-80% gone in the GYA due to non-native fungal disease and climate-driven bark beetle attacks; cutthroats have been all but wiped out by exotic lake trout (a deep-water fish unavailable to bears). Moths, which grizzlies eat by the pound, are subject to climate change and pesticides at lower elevations. This leaves meat-primarily elk-which bears shift to as other food sources disappear.More bears are dying as they increasingly use meat (livestock and hunter-killed carcasses) to replace traditional food sources, and come into more conflict with ranchers and hunters as a result."	1002	1003	1004	1005		Factor E	I am writing in OPPOSITION to the removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from ESA listing. Delisting the Greater Yellowstone grizzlies now would be premature. Key issues are: One of the slowest reproductive rates among land mammals, small average litter size, and long interval between litters Changes in the food supply: The whitebark pine forest is already 70-80% gone in the GYA due to non-native fungal disease and climate-driven bark beetle attacks; cutthroats have been all but wiped out by exotic lake trout (a deep-water fish unavailable to bears). Moths, which grizzlies eat by the pound, are subject to climate change and pesticides at lower elevations. This leaves meat-primarily elk-which bears shift to as other food sources disappear. More bears are dying as they increasingly use meat (livestock and hunter-killed carcasses) to replace traditional food sources, and come into more conflict with ranchers and hunters as a result." Habitat expansion and connectivity obstacles Immediate trophy hunting in all three states (Montana, Idaho, and Wyoming). With an estimated 717 bears-down from some 750 in 2014-conservationists advise a precautionary approach, particularly in light of the 55 conflict-related bear mortalities in the past year (and four orphaned cubs sent to zoos, bringing the loss of bears to 59), and the frighteningly low minimum population number of 600 proposed by the U.S. Fish & Wildlife Service.	FWS-R6-ES-2016-0042-0661	
First, these bears are under threat from a changing climate. They have four primary food sources. Two of these - whitebark pine seeds and cutthroat trout - have been decimated in recent years by climate change. The third food source - moths - is unreliable due to expanded pesticide use. Despite this, the USFWS has stated that climate change has not and likely will not have any impact on GYE grizzlies. This makes no sense and, in light of the wolverine decision, must be reconsidered.	1006	1002	1003	1004		Factor E	I strongly oppose the delisting of the Greater Yellowstone Ecosystem grizzly bear. First, these bears are under threat from a changing climate. They have four primary food sources. Two of these - whitebark pine seeds and cutthroat trout - have been decimated in recent years by climate change. The third food source - moths - is unreliable due to expanded pesticide use. Despite this, the USFWS has stated that climate change has not and likely will not have any impact on GYE grizzlies. This makes no sense and, in light of the wolverine decision, must be reconsidered. As a result of declining food sources, the bears have switched to more meat which increasingly puts them in conflict with ranchers and other humans. These conflicts often lead to the offending bear's removal from the ecosystem and resulted in a record number of bears removed last year. Further, GYE grizzlies are genetically isolated from bears in the north and there are no plans allowing for connectivity, which is critical for long term survival of the species. Grizzlies occupy a tiny fraction of their historic range so it is difficult to consider them "recovered." Finally, all three states involved - Wyoming, Montana and Idaho - have indicated that they will allow a trophy hunting season of these bears once delisted. Americans overwhelmingly disapprove of trophy hunting and, because there is no buffer or even no hunt zone between Yellowstone and Grand Tetons national parks, it is likely that famous roadside bears who are tolerant of people would be the first killed. This would create a firestorm of public outrage and damage the thriving tourism economy of the region. For these reasons, I oppose delisting and urge the USFWS to reexamine the plan to delist to consider the impact of climate change.	FWS-R6-ES-2016-0042-0660	
1) Climate Change is impacting the ecosystem - reducing white-bark pine nuts available to grizzlies	1002	1006				Factor E	I am against the removal of the Greater Yellowstone Grizzly Bear Population from the Federal List of Endangered and Threatened Species for the following reasons: 1) Climate Change is impacting the ecosystem - reducing white-bark pine nuts available to grizzlies. 2) Climate Change is impacting and altering the ecosystem in ways that we do not foresee. 3) Human population growth and urban development infringes on habitat and connectivity between populations. 4) Disease can spread through a small population and reduce the population significantly and/or cause extinction - such as has occurred with Tasmanian Devil (Devil facial tumor disease). 5) There is no protected natural connectivity to the Selway Bitterroot area in Idaho. 6) There is no nearby grizzly population in the Selway Bitterroot area in Idaho. 6) Delisting will allow trophy hunting of the grizzly bear - which is a thoroughly disgusting and self centered pastime.	FWS-R6-ES-2016-0042-0727	

Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds – obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have – been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout – (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- – elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food – source as well. That leaves meat as the only remaining high-quality food resource. The Rule cavalierly dismisses the loss of these critical foods by noting that grizzlies are – generalists with a broad range in diet, but what really is important for maintaining the population is – availability of high quality food at the right time of the year. True evaluation of alternative foods – replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred – and removal of T&E status should not be considered until it has	1002	1003	1004	4005	Factor E	Do not delist the Grizzly Bear. It requires if anything expanded, not minimized protection. There are five main reasons for this I would like to highlight but if I could write more, I could list several more reasons why this is not just a bad, but immoral action. 1. Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. 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An alternative hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. The alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population. This alternative hypothesis must be fully explored to satisfy the requirement for "best science" as required by law. 3. Excessive, unsustainable mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection. Removing T&E protection and placing it in the hands of the three states of Idaho, Montana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. 4. Genetic viability The Greater Yellowstone grizzly population is isolated from all other grizzly populations. This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, – allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly – population is seriously flawed and violates the requisite principle of "Best Science."	FWS-R6-ES-2016-0042-0742	
Genetic viability – The Greater Yellowstone grizzly population is isolated from all other grizzly populations. x This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the – genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, – allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly – population is seriously flawed and violates the requisite principle of "Best Science."	1001				Factor E	Do not delist the Grizzly Bear. It requires if anything expanded, not minimized protection. There are five main reasons for this I would like to highlight but if I could write more, I could list several more reasons why this is not just a bad, but immoral action. 1. Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Rule cavalierly dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. 2. Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase numbers in the ecosystem (ref. Fig. 1 p 13180, of The Rule). An alternative hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. The alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population. This alternative hypothesis must be fully explored to satisfy the requirement for "best science" as required by law. 3. Excessive, unsustainable mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection. Removing T&E protection and placing it in the hands of the three states of Idaho, Montana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. 4. Genetic viability The Greater Yellowstone grizzly population is isolated from all other grizzly populations. This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, – allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly – population is seriously flawed and violates the requisite principle of "Best Science."	FWS-R6-ES-2016-0042-0742	
Global warming, which the FWS denies has any effect at all on the lives or futures of grizzlies, is in itself sufficient reason to never delist the Yellowstone grizzly. For one thing, the region can likely expect a terrifying drought. But climate change has already proven a disaster for grizzlies. For millennia, the park's grizzlies have fed on nuts from the whitebark pine. The nut is highly nutritious and mother grizzlies who eat pine nuts have more cubs and better survival rates. Whitebark pine forests grow at high elevations in remote places, and so serve to separate vulnerable young and mother bears from armed hunters at lower altitudes outside the park during hunting season.	1006	1002			Factor E	In an isolated, island ecosystem like Yellowstone, once the number of dead bears greatly exceeds the number of cubs born, you're headed toward extinction. Here are the current stats: The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bears an accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality. Delisting the Yellowstone grizzlies will make them very easy for anyone to kill; without federal protection, their bearish lives will be made expendable. Another imperiled category of grizzlies are those who wander far from Yellowstone, attempting to link up with bear populations south of Glacier National Park. This connectivity is absolutely necessary for the longtime survival of Yellowstone's biologically-isolated grizzly bear population. Young male bears are often the first to begin this journey (which is essential for genetic viability), followed by female grizzlies whose presence constitutes true colonization of new habitats. Yet these bold, indispensable animals will be shot on sight. Global warming, which the FWS denies has any effect at all on the lives or futures of grizzlies, is in itself sufficient reason to never delist the Yellowstone grizzly. For one thing, the region can likely expect a terrifying drought. But climate change has already proven a disaster for grizzlies. For millennia, the park's grizzlies have fed on nuts from the whitebark pine. The nut is highly nutritious and mother grizzlies who eat pine nuts have more cubs and better survival rates. Whitebark pine forests grow at high elevations in remote places, and so serve to separate vulnerable young and mother bears from armed hunters at lower altitudes outside the park during hunting season.	FWS-R6-ES-2016-0042-0747	

deeply threatened already by the human activity that has led to climate change and drastically affected availability of the whitebark pine's nuts, which grizzlies have relied on for millenia.	1006	1002					Factor E	I strongly oppose delisting the Grizzlies who live in Yellowstone from the endangered/threatened wildlife list. These animals, the second-slowest reproducing land mammals on the North American continent, are deeply threatened already by the human activity that has led to climate change and drastically affected availability of the whitebark pine's nuts, which grizzlies have relied on for millenia. As human habitation threatens grizzlies' ability to successfully move between protected habitats (e.g., Yellowstone to grizzly habitats south of Glacier National Park) it would be deeply wrong and tragic for FWS to make it easier for trophy-hunters to slaughter these apex predators for sport. Humans have encroached upon more than enough grizzly habitat. Do not permit those who want to hang grizzly heads on their walls or tramp on grizzly skin rugs to encroach further.	FWS-R6-ES-2016-0042-0762	
With ever increasing human population, climate change pressures on food sources and the subsequent changing of food sources, including the managed poisoning of invasive species in the Yellowstone lake tributaries has greatly changed food sourcing patterns. This pressure, along with the severe decline of the white bark pine high caloric food source, the 2 best resources are largely gone. This food pressure has force the bears to different areas and searching for different resources	1006	1002					Factor E	Delisting an endangered species is a shortsighted goal. With ever increasing human population, climate change pressures on food sources and the subsequent changing of food sources, including the managed poisoning of invasive species in the Yellowstone lake tributaries has greatly changed food sourcing patterns. This pressure, along with the severe decline of the white bark pine high caloric food source, the 2 best resources are largely gone. This food pressure has force the bears to different areas and searching for different resources.. Subsequently, bears are appearing more often in former habitat that is continually being subdivided. This human activity in prime habitat is continually putting bears in harms way. Many people in these areas do not properly handle their trash. This leads to more Human/ bear lethal incidents, this will continue to increase. None of this helps the only lower 48 surviving populations to continue survive. With few producing sows, the last thing the bears need is delisting and the ensuing hunt. The grizzly is our heritage. There are not many even in the best of times. The data you see is skewed, simply by more intensive head counting by airplane and so forth. This would lead one to believe the numbers are increasing but in fact that is not known, it is only more efficient observation. With these methods a solid 20 years of the same head counting observations would provide a real data table of population numbers.	FWS-R6-ES-2016-0042-0791	
I would ask that FWS please refer to the recent ruling by Judge Dana Christensen in that they "review the science on climate change for the wolverine", and apply that very same review to the Yellowstone Grizzly. Please consider that climate change already has and will continue to have a very real and threatening effect on the stability of the ecosystem where these great bears reside. The Whitebark Pine is a primary source of nutrition for the grizzly as they prepare for hibernation and we see this species of tree, as well as many others, have been decimated by blister rust and the pine beetle. We must take action at the earliest defensible time to protect against the loss of biodiversity and that time is now.	1006	1002					Factor E	I am deeply concerned about the considerations of FWS to remove the Yellowstone Grizzly Bear population from their Endangered Species status. I would ask that FWS please refer to the recent ruling by Judge Dana Christensen in that they "review the science on climate change for the wolverine", and apply that very same review to the Yellowstone Grizzly. Please consider that climate change already has and will continue to have a very real and threatening effect on the stability of the ecosystem where these great bears reside. The Whitebark Pine is a primary source of nutrition for the grizzly as they prepare for hibernation and we see this species of tree, as well as many others, have been decimated by blister rust and the pine beetle. We must take action at the earliest defensible time to protect against the loss of biodiversity and that time is now. The grizzly bear as an apex predator has a complex role and provides necessary stability to the Yellowstone ecosystem. Reducing their numbers as rapidly as sport hunting allows also reduces the lack of genetic variability in the population since they are biologically isolated. I am opposed to delisting the Grizzly bear from the Yellowstone Ecosystem. The grizzly is much more valuable than a trophy adornment on a wall or the floor. Thank you for your consideration.	FWS-R6-ES-2016-0042-0876	

The grizzly bear as an apex predator has a complex role and provides necessary stability to the Yellowstone ecosystem. Reducing their numbers as rapidly as sport hunting allows also reduces the lack of genetic variability in the population since they are biologically isolated.	1001					Factor E	I am deeply concerned about the considerations of FWS to remove the Yellowstone Grizzly Bear population from their Endangered Species status. I would ask that FWS please refer to the recent ruling by Judge Dana Christensen in that they "review the science on climate change for the wolverine", and apply that very same review to the Yellowstone Grizzly. Please consider that climate change already has and will continue to have a very real and threatening effect on the stability of the ecosystem where these great bears reside. The Whitebark Pine is a primary source of nutrition for the grizzly as they prepare for hibernation and we see this species of tree, as well as many others, have been decimated by blister rust and the pine beetle. We must take action at the earliest defensible time to protect against the loss of biodiversity and that time is now. The grizzly bear as an apex predator has a complex role and provides necessary stability to the Yellowstone ecosystem. Reducing their numbers as rapidly as sport hunting allows also reduces the lack of genetic variability in the population since they are biologically isolated. I am opposed to delisting the Grizzly bear from the Yellowstone Ecosystem. The grizzly is much more valuable than a trophy adornment on a wall or the floor. Thank you for your consideration.	FWS-R6-ES-2016-0042-0876	
Our Wyoming, Idaho and Montana Game and Fish departments who are also part of the IGBC, will argue that Yellowstone and Grand Teton Parks are the safety zone firewall that will protect the grizzlies. I counter point; if Yellowstone and Grand Teton Parks could protect them, why did the population crash to start with? That is why the alphabet soup of agencies of the IGBC in 1993 created the more logical and demonstrably effective "Grizzly Bear Recovery Zone"; known today as the "Primary Conservation Area (PCA)."The PCA has fostered the glacial pace yet successful recovery we enjoy today. This Primary Conservation Area is 9,210 square miles equaling 5,893,760 acres. This original "Grizzly Bear Recovery Zone" has to be the firewall "no hunting zone" to insure the "continuity of achievement" of the Grizzly Bear Recovery effort. Wyoming Game and Fish thinks 7,229 square miles equaling 4,626,560 acres is adequate. "I'm sure Montana and Idaho Game and Fish agree. Clearly that would infringe on the range the Grizzly Recovery efforts deemed important essential recovery habitat. The IGBC Recovery Plan states; The PCA contains "The Minimum " seasonal habitat components needed to support the recovered grizzly bear population, as defined in the Recovery Plan. "A recovered population is one having a high probability of existence into the foreseeable future (greater than 100 years)." (Note) This statement in the recovery plan was drafted before the crash of the essential food sources, white bark pine and the Yellowstone cutthroat trout populations.						Factor E	The delisting of the Yellowstone Grizzly Bear is imminent and this we should celebrate ("dancing"). Now that our happy dance is complete, we must insure the grizzlies' recovery is permanent. To insure "continuity of achievement," the grizzlies need a firewall to protect the success of this achievement from human foible. Many will argue differently, but I believe that our "isolated" population of grizzlies has recovered; albeit tenuously, and I don't have a problem with the delisting. The problem is, as the delisting of the wolves demonstrated; a hunting season for grizzlies will soon follow. I believe a hunting season is a freight train coming at us we can't stop! Managing grizzly bears for the Game and Fish departments is expensive, and they desire to recoup some expense with grizzly bear hunting tags, but their real savings will be the killing of bears. All we can do is hope to mitigate the outcome by providing a firewall, a fall back zone where the grizzlies will never be hunted, an incubator of sorts. Social tolerance" is the term used by grizzly managers when considering the human factor intersect. Social acceptance is a tough sell for those who fear predators might hurt their children along the wildland-urban interface; grizzly advocates must understand this as we move forward with our mitigative efforts to insure a long-term grizzly recovery. If the residents on the outskirts of our towns and ranchers along the periphery of your National Forests can protect their property, social acceptance for grizzlies in our wild areas will grow. If people keep getting attacked outside Livingston, and grizzlies are harvesting apples in St. Anthony, or trying to den in garages in Driggs, social tolerance will shrink. We need to cultivate social tolerance, not risk it. My social tolerance for grizzlies is high because I have one of the 155+ easily discernable jobs created by grizzly bear tourism. I consider them "Revenue Bears," Game and Fish doesn't. Every hotel and restaurant of the Greater Yellowstone communities are beneficiaries of "Revenue Bear" tourism. I wish we wouldn't have a hunt, but as a pragmatist, I don't have a problem with a limited hunting season for the grizzly bears. Our Wyoming, Idaho and Montana Game and Fish departments who are also part of the IGBC, will argue that Yellowstone and Grand Teton Parks are the safety zone firewall that will protect the grizzlies. I counter point; if Yellowstone and Grand Teton Parks could protect them, why did the population crash to start with? That is why the alphabet soup of agencies of the IGBC in 1993 created the more logical and demonstrably effective "Grizzly Bear Recovery Zone"; known today as the "Primary Conservation Area (PCA)." The PCA has fostered the glacial pace yet successful recovery we enjoy today. This Primary Conservation Area is 9,210 square miles equaling 5,893,760 acres. This original "Grizzly Bear Recovery Zone" has to be the firewall "no hunting zone" to insure the "continuity of achievement" of the Grizzly Bear Recovery effort. Wyoming Game and Fish thinks 7,229 square miles equaling 4,626,560 acres is adequate. "I'm sure Montana and Idaho Game and Fish agree. Clearly that would infringe on the range the Grizzly Recovery efforts deemed important essential recovery habitat. The IGBC Recovery Plan states; The PCA contains "The Minimum " seasonal habitat components needed to support the recovered grizzly bear population, as defined in the Recovery Plan. "A recovered population is one having a high probability of existence into the foreseeable future (greater than 100 years)." (Note) This statement in the	FWS-R6-ES-2016-0042-0787	
Over the last years since wolves were re-introduced into Yellowstone, hasn't scientific evidence proved the value of having an intact ecosystem for the health of all species and habitat? If the GYA bears are designated as a distinct and delisted population, haven't you condemned them to a slow extinction, due to lack of biodiversity? Wouldn't this time and effort be better directed toward expansion of the Greater Yellowstone Ecosystem and connection with the bear populations farther north and on into Canada?	1001					Factor E	I strongly oppose delisting the GYA population of grizzly bears from The Endangered Species list. Over the last years since wolves were re-introduced into Yellowstone, hasn't scientific evidence proved the value of having an intact ecosystem for the health of all species and habitat? If the GYA bears are designated as a distinct and delisted population, haven't you condemned them to a slow extinction, due to lack of biodiversity? Wouldn't this time and effort be better directed toward expansion of the Greater Yellowstone Ecosystem and connection with the bear populations farther north and on into Canada? I'm sure many forces exert their power and influence on the USFW. I hope the forces for preservation prevail and we can anticipate even greater recovery and biodiversity for this magnificent creature.	FWS-R6-ES-2016-0042-5322	

The proposal goes on to address the many factors such as climate change, food availability, increasing human/bear conflicts. Then based solely on increased numbers, say none of these factors is harming recovery. This is purely speculative. These factors are in flux. Basically we just cannot know the future conditions. We need more years to document trends. With the low reproductive rate, if we have erred on the side of over optimistic speculation, recovery will suffer a major setback.	1006	1000				Factor E	See Attached Attachments Patten Eva	FWS-R6-ES-2016-0042-1227	
Climate change effects on Yellowstone's grizzlies are dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in x the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. Å	1006					Factor E	I oppose delisting of the Yellowstone population of grizzly bears. The species should not be removed from the Federal List of Endangered and Threatened Wildlife. In 2015, approximately 70 bears died. This represents about 10% of the total population for the slowest reproducing mammal in North America. This mortality rate is not sustainable. The 10% rate occurred even with federal protection of the Threatened and Endangered Species act. Removing such protection and placing it with Idaho, Montana, and Wyoming is incompatible with a sustainable population. These three states have clearly demonstrated hostility to co-existence with large carnivores and seem to view them only as unwanted pests or a commodity for revenue through hunting licenses, etc. Demonstrated, real-world sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Climate change effects on Yellowstone's grizzlies are dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. Four critical foods make up the diet of grizzlies in the Yellowstone ecosystem: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. The expanding range of Yellowstone's grizzlies is depicted in The Rule as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). A more reasonable hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement for "best science" as required by law. The grizzly population of the Yellowstone ecosystem is isolated from all other grizzly populations (pp. 13190-13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large.	FWS-R6-ES-2016-0042-5355	
Four critical foods make up the diet of grizzlies in the Yellowstone ecosystem : whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. x True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. 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This represents about 10% of the total population for the slowest reproducing mammal in North America. This mortality rate is not sustainable. The 10% rate occurred even with federal protection of the Threatened and Endangered Species act. Removing such protection and placing it with Idaho, Montana, and Wyoming is incompatible with a sustainable population. These three states have clearly demonstrated hostility to co-existence with large carnivores and seem to view them only as unwanted pests or a commodity for revenue through hunting licenses, etc. Demonstrated, real-world sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Climate change effects on Yellowstone's grizzlies are dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. Four critical foods make up the diet of grizzlies in the Yellowstone ecosystem: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. The expanding range of Yellowstone's grizzlies is depicted in The Rule as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). A more reasonable hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement for "best science" as required by law. The grizzly population of the Yellowstone ecosystem is isolated from all other grizzly populations (pp. 13190-13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large.	FWS-R6-ES-2016-0042-5355	

Climate change and it's impacts on grizzly bear habitat, behavior and food selection is perhaps the greatest threat to the Yellowstone grizzlies. These threats and potential impacts are not yet fully understood. With traditional and critical food sources such as whitebark pine nuts, cutthroat trout, army cutworm moths, wild berries, elk and bison already on the decline, grizzlies are already wondering farther and into new territory in search of other food. This puts them in increasing conflict with humans, which means increased mortality for bears. I do realize that grizzly bears are adaptable, opportunistic omnivores, but the impacts of them adapting to new food sources has not been adequately addressed and is not yet fully understood. That, combined with a growing human population and other associated threats to grizzly habitat, adds up to some serious and legitimate concerns about the future of Yellowstone grizzlies.	1006	1002	1003	1004	1005	Factor E	While I greatly respect, appreciate and applaud your tremendous and successful efforts to help Yellowstone grizzly bear populations recover from the threat of extinction, there are too many legitimate concerns -- voiced by some very prominent grizzly bear biologists, managers and other experts -- to remove the Yellowstone grizzly population from the Endangered Species Act at this time. I urge you to err on the side of caution and ensure these concerns and threats regarding grizzlies are better understood and dealt with before you delist them. Climate change and it's impacts on grizzly bear habitat, behavior and food selection is perhaps the greatest threat to the Yellowstone grizzlies. These threats and potential impacts are not yet fully understood. With traditional and critical food sources such as whitebark pine nuts, cutthroat trout, army cutworm moths, wild berries, elk and bison already on the decline, grizzlies are already wondering farther and into new territory in search of other food. This puts them in increasing conflict with humans, which means increased mortality for bears. I do realize that grizzly bears are adaptable, opportunistic omnivores, but the impacts of them adapting to new food sources has not been adequately addressed and is not yet fully understood. That, combined with a growing human population and other associated threats to grizzly habitat, adds up to some serious and legitimate concerns about the future of Yellowstone grizzlies. There are also other, legitimate concerns about how state management of grizzly bears might impact the ability of grizzly bears to expand through critical linkage zones and eventually connect with other populations to help ensure the long-term genetic health and viability of the Yellowstone grizzly populations. Until we know more about the potential impacts of these serious threats to the Yellowstone grizzlies, I urge you to err on the side of caution and not delist the population at this time. We have come a long way in the recovery of grizzly bears in the Yellowstone ecosystem; let's ensure the long-term health, viability and survival of these bears is truly secure before acting too hastily. The bears deserve more time, caution and consideration. Thank you for your consideration, and thanks again for all you have done and continue to do to help grizzly bears recover.	FWS-R6-ES-2016-0042-5387	
The current (and future) environmental pressure the bears face due to climate change are already highly problematic for these animals. If these conditions continue - or worsen- as they are expected to do, the bears will most likely be forced to leave the confines of their protected area to search out additional food sources. Once outside the park they will have no protections and will be fair game for anyone who wants a trophy.	1006					Factor E	I am speaking out against the delisting of grizzlies for a number of reasons. Of most concern is that once the animals are delisted they will be open to truly unsustainable hunting pressures. Why do I say this? The current (and future) environmental pressure the bears face due to climate change are already highly problematic for these animals. If these conditions continue - or worsen- as they are expected to do, the bears will most likely be forced to leave the confines of their protected area to search out additional food sources. Once outside the park they will have no protections and will be fair game for anyone who wants a trophy. This is a disaster waiting to happen: Hunting is indiscriminate - it is difficult, if not impossible, for most hunters to determine male from female, or to insure that they are not destroying robust animals in their reproductive prime. Do we know how the sex ratio needed to sustain a viable population will be altered as a result of new hunting pressures? And if hunters take reproductively mature individuals the outcomes are obvious: grizzlies have a slow reproductive rate and also take many years to reach reproductive maturity. The idea that this population of only 700 or so bears can sustain the pressures they would face upon delisting is doubtful at best and certainly requires more study. On this alone delisting should not be considered an option at this time; and unless the delisting is done for the benefit of the grizzlies themselves, and for the overall integrity and health of the Yellowstone ecosystem, then the option to delist should be abandoned completely. Thank you for your consideration.	FWS-R6-ES-2016-0042-5372	
Their numbers are still low, their diet is disrupted by climate change. Living in a park makes them unwary of people and therefore easy marksfor hunters.	1006					Factor E	Please DO NOT delist grizzly bears at Yellowstone as an endangered species! Maintain Federal Protection and do not allow them to be exposed to trophy hunting! Their numbers are still low, their diet is disrupted by climate change. Living in a park makes them unwary of people and therefore easy marks for hunters. LET BEARS PERSIST! DO NOT DELIST!	FWS-R6-ES-2016-0042-1286	

It is particularly objectionable to delist a species we've invested so much in to maintain genetic diversity and while evaluating the reintroduction into the North Cascades with a primary outcome being the issuance of trophy hunting permits which provides no one essential resource to human survival.	1001					Factor E	I am writing to object to the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered Species. Given uncertainty in larger ecosystem functions due to climate change, real uncertainty about survival of critical plant species for the survival of grizzlies, continued fragmentation of habitat from development, significant and ongoing potential for unforeseen disease striking a small and fragmented species, (e.g. Whitnose bat syndrome) it is inappropriate to delist a long lived, slowly reproducing species which survives in a much diminished and fragmented habitat range. It is particularly objectionable to delist a species we've invested so much in to maintain genetic diversity and while evaluating the reintroduction into the North Cascades with a primary outcome being the issuance of trophy hunting permits which provides no one essential resource to human survival. Retaining this species in healthy population numbers sufficient to withstand changing future conditions we cannot predict is our generational obligation. I urge the USFWS to not delist the Yellowstone Grizzly.	FWS-R6-ES-2016-0042-1271	
With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting?	1006					Factor E	I oppose the delisting of Grizzly Bears on the following grounds: - There are too many unknowns in climate/food source/habitat right now. - We just spent millions of dollars and it has taken 40 years to increase the bear population from 125 to 725 (demonstrating the length of time for reproduction) With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting?	FWS-R6-ES-2016-0042-1361	
A very important thing that USFW is in denial about is climate change, which will most certainly have an effect on the future lives of Grizzlies. Climate change itself is sufficient reason to never delist Yellowstone Grizzlies. But climate change has already proven to be detrimental to Grizzlies. For hundreds of years, the park's Grizzlies have fed on nuts from the whitebark pine. The nut is extremely nutritious and mother Grizzlies who eat pine nuts have more cubs and better survival rates. Whitebark pine forests grow at high elevations in remote places, and thus help to separate vulnerable young and mother bears from hunters at lower elevations outside the park during hunting season. The pine nut, Yellowstone's most important Grizzly food, disappeared approximately ten years ago when winter temperatures warmed to the point where mountain pine beetle larva could spend winters in the pine trees' bark. With the arrival of summer, adult beetles destroy these trees. By 2009, 95 percent of the mature, cone-bearing trees were "functionally extinct," in the words of retired Forest Service biologist Jesse Logan. It is doubtful that whitebark pines will return. The USFWS has admitted that this food source is disappearing, yet has the audacity to say that its disappearance "has had no profound negative effects on Grizzly bears at the individual or population level." Such a statement flies in the face of the best available science, and shows that the USFWS is pandering to special interests rather than adhering to scientific facts. In addition to the destruction of whitebark pines, climate change will bring more dry weather to the Yellowstone region that will degrade the habitat and the carrying capacity for Grizzlies. The federal government's denial about how climate change effects the current and future lives of Grizzlies, and its denial about the impact that trophy hunting will have on the Grizzly population, is utterly inexcusable.	1006	1002				Factor E	I have worked in Yellowstone National Park as a biological science technician, and thus have had the great fortune to be able to observe, study, and learn about Grizzly Bears. I am writing in opposition to the proposed delisting of Yellowstone Grizzlies. This proposal to delist Grizzlies creates an environment where the lives of these bears will be cheapened. Indeed, Wyoming, Idaho, and Montana are chomping at the bit to kill Grizzlies, and have already divided up the number of bears that each state should be permitted to kill. Is this all that Grizzly lives are worth? As trophies or rugs to throw on the floor? Under this proposal, Grizzlies will be killed at any time for almost any reason. Grizzly bears tend to feed in open country, and will make easy targets. One of their most important food sources is the army cutworm moth, found in high open scree fields above timberline in summer. Grizzlies gather together in these areas, knocking over rocks and consuming the moths. Hunting Grizzlies under these conditions is not sport—it is complete slaughter. Hunting the slowest reproducing land mammal in North America and expecting that animal to still thrive reflects utter ignorance and foolhardiness on the part of those who have proposed the delisting of Grizzlies. A very important thing that USFW is in denial about is climate change, which will most certainly have an effect on the future lives of Grizzlies. Climate change itself is sufficient reason to never delist Yellowstone Grizzlies. But climate change has already proven to be detrimental to Grizzlies. For hundreds of years, the park's Grizzlies have fed on nuts from the whitebark pine. The nut is extremely nutritious and mother Grizzlies who eat pine nuts have more cubs and better survival rates. Whitebark pine forests grow at high elevations in remote places, and thus help to separate vulnerable young and mother bears from hunters at lower elevations outside the park during hunting season. The pine nut, Yellowstone's most important Grizzly food, disappeared approximately ten years ago when winter temperatures warmed to the point where mountain pine beetle larva could spend winters in the pine trees' bark. With the arrival of summer, adult beetles destroy these trees. By 2009, 95 percent of the mature, cone-bearing trees were "functionally extinct," in the words of retired Forest Service biologist Jesse Logan. It is doubtful that whitebark pines will return. The USFWS has admitted that this food source is disappearing, yet has the audacity to say that its disappearance "has had no profound negative effects on Grizzly bears at the individual or population level." Such a statement flies in the face of the best available science, and shows that the USFWS is pandering to special interests rather than adhering to scientific facts. In addition to the destruction of whitebark pines, climate change will bring more dry weather to the Yellowstone region that will degrade the habitat and the carrying capacity for Grizzlies. The federal government's denial about how climate change effects the current and future lives of Grizzlies, and its denial about the impact that trophy hunting will have on the Grizzly population, is utterly inexcusable. It is time for the USFWS to stop bowing to the pressure of special interests and to instead do the job it is supposed to do: Protect and preserve endangered and threatened species using the BEST AVAILABLE SCIENCE. The Yellowstone Grizzlies, and all wildlife, deserve this. Thus, I strongly urge you not to delist Grizzlies in the Yellowstone region. Thank you for your time and consideration.	FWS-R6-ES-2016-0042-1355	

Enough grizzly bears are lost to habitat reduction, climate change, and salmon and food loss - stop this possible action now and keep grizzly bears protected at Yellowstone and all our parks.	1006	1000				Factor E	As a beloved user of our national parks, I urge you to not remove the protection of grizzly bears at Yellowstone. This last great species should remain forever protected at our national parks and across the USA, and not be made vulnerable to trophy hunters. Shame on anyone who would let so few benefit at the detriment of so many of us who love and treasure our precious wildlife resources. Enough grizzly bears are lost to habitat reduction, climate change, and salmon and food loss - stop this possible action now and keep grizzly bears protected at Yellowstone and all our parks.	FWS-R6-ES-2016-0042-1395	
THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely.	1001					Factor E	Do NOT delist the Yellowstone Grizzlies! - THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - DECLINING FOOD SOURCES: Historically bears dependent on 4 food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. These states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. - GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. Sow's will be killed and Cubs left to starve or be killed by predators. Don't delist the Grizzlies. Too many of them are being killed even with protection. There is no reason to delist them. Do you really want the states to lose millions of tourist dollars? That's what will happen because millions of people come to the Tetons and Yellowstone to see the Grizzlies. If they are hunted they won't be seen in the parks like they are now. To delist them is totally wrong on so many levels.	FWS-R6-ES-2016-0042-1366	
The loss of key food sources due to climate change, slow reproductive rates, and the fact that the state plans to "manage" and "reduce" numbers through trophy hunts guarantee an unsustainable future for the species.	1006					Factor E	Grizzly bears in the Greater Yellowstone Ecosystem have benefited greatly from ESA protections but are not even close to fully recovered in the area, and are very vulnerable. It has taken 40 years of protections to get the population where it is. Losing ESA protections means they would be immediately hunted Grizzliehunters, which would set population numbers in an immediate decline. The USFWS proposal to delist the grizzly not only puts a stop to this recovery, it will quickly QUICKLY reverse it. This would turn management of this iconic species over to the states and subject these animals to trophy hunting seasons in Montana, Idaho and Wyoming. Removing federal protections from this one small, isolated population and immediately hunting them will likely start an immediate decline back towards extinction. We do not recover species from the ESA, to delist and immediately begin hunting them. This is not the intention of the Endangered Species Act. The ESA is not a game farm plan. The purpose of the ESA is to protect and recover imperiled species and the ecosystems upon which they depend. It was designed to protect critically imperiled species from extinction as a "consequence of economic growth and development untempered by adequate concern and conservation." The U.S. Supreme Court found that "the plain intent of Congress in enacting" the ESA "was to halt and reverse the trend toward species extinction, whatever the cost. To delist species, several factors are considered: the threats are eliminated or controlled, population size and growth, and the stability of habitat quality and quantity. The threats are not eliminated nor controlled, but greater than ever. Habitat quality and quantity are currently unstable, and further unsustainable if delisted. The direct and indirect threats to the grizzly are enormous. The loss of key food sources due to climate change, slow reproductive rates, and the fact that the state plans to "manage" and "reduce" numbers through trophy hunts guarantee an unsustainable future for the species. The American public overwhelmingly wants grizzly bears protected for future generations, not killed by a few trophy hunters. Grizzly bears are a wildlife icon that have been a part of the American West and been integral to the Yellowstone region for centuries. Each year, visitors spend millions in the region, hoping to catch a glimpse of a grizzly, this beautiful and powerful symbol of our wild heritage. And as an apex predator, their presence is crucial to the health of wildlife in the Greater Yellowstone region. If the delisting goes through, the very states Wyoming, Montana, and Idaho that had their management authority over grizzlies taken away for failing to keep their populations healthy will again assume primary custodial care. Due to the extreme hostility towards wildlife predators, Wyoming's treatment of other delisted predators, namely wolves, and state policies allow wolves to be killed for any reason over 85% of the state. In the latest grizzly recovery plan, the bears are strictly protected in the core of the park, but there are very liberal hunting policies just barely outside the park and lethal control if they encounter livestock on public lands. The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. Grizzly bears are the slowest reproducing mammals in North America. A female bear will at best duplicate herself in a 10-year period. Questionable	FWS-R6-ES-2016-0042-1424	

The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor.	1001					Factor E	Grizzly bears in the Greater Yellowstone Ecosystem have benefited greatly from ESA protections but are not even close to fully recovered in the area, and are very vulnerable. It has taken 40 years of protections to get the population where it is. Losing ESA protections means they would be immediately hunted Grizzly hunters, which would set population numbers in an immediate decline. The USFWS proposal to delist the grizzly not only puts a stop to this recovery, it will quickly QUICKLY reverse it. This would turn management of this iconic species over to the states and subject these animals to trophy hunting seasons in Montana, Idaho and Wyoming. Removing federal protections from this one small, isolated population and immediately hunting them will likely start an immediate decline back towards extinction. We do not recover species from the ESA, to delist and immediately begin hunting them. This is not the intention of the Endangered Species Act. The ESA is not a game farm plan. The purpose of the ESA is to protect and recover imperiled species and the ecosystems upon which they depend. It was designed to protect critically imperiled species from extinction as a "consequence of economic growth and development untempered by adequate concern and conservation." The U.S. Supreme Court found that "the plain intent of Congress in enacting" the ESA "was to halt and reverse the trend toward species extinction, whatever the cost. To delist species, several factors are considered: the threats are eliminated or controlled, population size and growth, and the stability of habitat quality and quantity. The threats are not eliminated nor controlled, but greater than ever. Habitat quality and quantity are currently unstable, and further unsustainable if delisted. The direct and indirect threats to the grizzly are enormous. The loss of key food sources due to climate change, slow reproductive rates, and the fact that the state plans to "manage" and "reduce" numbers through trophy hunts guarantee an unsustainable future for the species. The American public overwhelmingly wants grizzly bears protected for future generations, not killed by a few trophy hunters. Grizzly bears are a wildlife icon that have been a part of the American West and been integral to the Yellowstone region for centuries. Each year, visitors spend millions in the region, hoping to catch a glimpse of a grizzly, this beautiful and powerful symbol of our wild heritage. And as an apex predator, their presence is crucial to the health of wildlife in the Greater Yellowstone region. If the delisting goes through, the very states Wyoming, Montana, and Idaho that had their management authority over grizzlies taken away for failing to keep their populations healthy will again assume primary custodial care. Due to the extreme hostility towards wildlife predators, Wyoming's treatment of other delisted predators, namely wolves, and state policies allow wolves to be killed for any reason over 85% of the state. In the latest grizzly recovery plan, the bears are strictly protected in the core of the park, but there are very liberal hunting policies just barely outside the park and lethal control if they encounter livestock on public lands. The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, (cutthroat trout and especially Whitebark Pine) diminish. There are too many unknowns in climate/food source/habitat right now. The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (Gray Wolves).	FWS-R6-ES-2016-0042-1424	
Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, (cutthroat trout and especially Whitebark Pine) diminish. There are too many unknowns in climate/food source/habitat right now. The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (Gray Wolves).	1002	1003				Factor E	Grizzly bears in the Greater Yellowstone Ecosystem have benefited greatly from ESA protections but are not even close to fully recovered in the area, and are very vulnerable. It has taken 40 years of protections to get the population where it is. Losing ESA protections means they would be immediately hunted Grizzly hunters, which would set population numbers in an immediate decline. The USFWS proposal to delist the grizzly not only puts a stop to this recovery, it will quickly QUICKLY reverse it. This would turn management of this iconic species over to the states and subject these animals to trophy hunting seasons in Montana, Idaho and Wyoming. Removing federal protections from this one small, isolated population and immediately hunting them will likely start an immediate decline back towards extinction. We do not recover species from the ESA, to delist and immediately begin hunting them. This is not the intention of the Endangered Species Act. The ESA is not a game farm plan. The purpose of the ESA is to protect and recover imperiled species and the ecosystems upon which they depend. It was designed to protect critically imperiled species from extinction as a "consequence of economic growth and development untempered by adequate concern and conservation." The U.S. Supreme Court found that "the plain intent of Congress in enacting" the ESA "was to halt and reverse the trend toward species extinction, whatever the cost. To delist species, several factors are considered: the threats are eliminated or controlled, population size and growth, and the stability of habitat quality and quantity. The threats are not eliminated nor controlled, but greater than ever. Habitat quality and quantity are currently unstable, and further unsustainable if delisted. The direct and indirect threats to the grizzly are enormous. The loss of key food sources due to climate change, slow reproductive rates, and the fact that the state plans to "manage" and "reduce" numbers through trophy hunts guarantee an unsustainable future for the species. The American public overwhelmingly wants grizzly bears protected for future generations, not killed by a few trophy hunters. Grizzly bears are a wildlife icon that have been a part of the American West and been integral to the Yellowstone region for centuries. Each year, visitors spend millions in the region, hoping to catch a glimpse of a grizzly, this beautiful and powerful symbol of our wild heritage. And as an apex predator, their presence is crucial to the health of wildlife in the Greater Yellowstone region. If the delisting goes through, the very states Wyoming, Montana, and Idaho that had their management authority over grizzlies taken away for failing to keep their populations healthy will again assume primary custodial care. Due to the extreme hostility towards wildlife predators, Wyoming's treatment of other delisted predators, namely wolves, and state policies allow wolves to be killed for any reason over 85% of the state. In the latest grizzly recovery plan, the bears are strictly protected in the core of the park, but there are very liberal hunting policies just barely outside the park and lethal control if they encounter livestock on public lands. The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, (cutthroat trout and especially Whitebark Pine) diminish. There are too many unknowns in climate/food source/habitat right now. The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned.	FWS-R6-ES-2016-0042-1424	
The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor.	1001					Factor E	As a frequent visitor to the GYE, I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, (cutthroat trout and especially Whitebark Pine) diminish. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned.	FWS-R6-ES-2016-0042-1483	

Climate change has decimated the pine nuts and wrecked havoc on the food sources despite what reports say.	1006	1002					Factor E	Do not delist the Grizzly bear for the following reasons. 1. FWS's mission is to protect wildlife, not delist. 2. The delisting will result in condemning the Grizzly to certain slaughter. 3. Climate change has decimated the pine nuts and wrecked havoc on the food sources despite what reports say. 4. Delisting is a death warrant for countless bears. 5. Obsolete methods of counting the bears are being used in jeopardy of good science. 6. This is a violation of ethics to destroy an iconic species that draws many dollars to the tri state area. Also, FWC has the obligation to protect, not sanction the killing of these magnificent creatures. They are a vital part of the West. 7. This apex predator plays a vital role. The reintroduction of the wolf in Yellowstone was a huge positive influence. 8. The 59 listed kills in 2015 is actually about half the actual kills. 9. Delisting will kill 200 bears out of the 700 in the first year. This is unacceptable and unsustainable. 10. FWC is losing credibility nationally for doing just this type of wildlife "management" which factors into "takes" that is only sugar coats the slaughter that results. 11. The ranching, hunting, grazing and other special interest groups are being overly patronized to via these unsound, lack of scientific decisions that destroy a species that many resources have gone into preserving & protecting. Do the right thing and don't even think about this ridiculous, tragic proposal that leave FWC with still another ill conceived decision that will forever taint your legacy. Thank you for the consideration. Show some vision and stand your ground.	FWS-R6-ES-2016-0042-1512	
There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves).	1006	1000					Factor E	As a frequent visitor to the GYE, I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, (cutthroat trout and especially Whitebark Pine) diminish. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned.	FWS-R6-ES-2016-0042-1483	
Grizzly bears in Yellowstone have historically depended on four critical foods: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Both whitebark pine seeds and cutthroat trout abundance have declined significantly in the past few years. The 1988 fires, blister rust, and unprecedented bark beetle outbreak have decreased the health and abundance of whitebark pine forests in Yellowstone. Cutthroat trout have also been decimated (losses greater than 90% in many important spawning streams) with the introduction of Lake Trout into Yellowstone Lake.	1003	1002	1004	1005			Factor E	I am concerned about the removal of Endangered Species Act (ESA) protections from grizzly bears in the Greater Yellowstone region. I do not feel sufficient evidence exists to support this proposed delisting and satisfy the requirement for "best science" as required by law. It does not appear that declining food resources and climate change impacts have been sufficiently analyzed in the proposed grizzly bear delisting. Grizzly bears in Yellowstone have historically depended on four critical foods: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Both whitebark pine seeds and cutthroat trout abundance have declined significantly in the past few years. The 1988 fires, blister rust, and unprecedented bark beetle outbreak have decreased the health and abundance of whitebark pine forests in Yellowstone. Cutthroat trout have also been decimated (losses greater than 90% in many important spawning streams) with the introduction of Lake Trout into Yellowstone Lake. That evidence alone suggests a greater scientific analysis of grizzly bear food source health and abundance needs to be done prior to drastic management change. Additionally cutworm moths are not a reliable food source for grizzly bears since they migrate to high elevation talus slopes from low elevation agricultural fields where they are considered a pest. Pesticides and new farming technologies such as GMO crops could dramatically reduce this grizzly bear food source. That leaves only one of four critical food sources (25%) that appears to be stable. The impact of climate change is essentially dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." There is not enough scientific evidence to validate this statement a citation of an un-referred summary publication authored by the principle author of The Rule, Dr. Servheen. It's difficult to see that as anything but bias from an outside perspective. Additionally there is ample evidence (pp. 13216 - 13217) that the Yellowstone grizzly population has already been detrimentally affected by climate change. This evidence is similarly dismissed with the statement, "grizzly bears are adaptable, they'll do just fine," of which there is little to no supporting evidence. Not to mention that in the lower 48 states, grizzly bears occupy less than 2% of their historic range. The Yellowstone grizzly bears remain completely isolated. We need a connected population of several thousand bears for true recovery and genetic viability. Removing ESA protections from Yellowstone grizzly bears is premature and violates the requisite principle of "best science" as required by law.	FWS-R6-ES-2016-0042-1513	

The impact of climate change is essentially dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." There is not enough scientific evidence to validate this statement a citation of an un-referred summary publication authored by the principle author of The Rule, Dr. Servheen. It's difficult to see that as anything but bias from an outside perspective. Additionally there is ample evidence (pp. 13216 - 13217) that the Yellowstone grizzly population has already been detrimentally affected by climate change. This evidence is similarly dismissed with the statement, "grizzly bears are adaptable, they'll do just fine," of which there is little to no supporting evidence.	1006						Factor E	I am concerned about the removal of Endangered Species Act (ESA) protections from grizzly bears in the Greater Yellowstone region. I do not feel sufficient evidence exists to support this proposed delisting and satisfy the requirement for "best science" as required by law. It does not appear that declining food resources and climate change impacts have been sufficiently analyzed in the proposed grizzly bear delisting. Grizzly bears in Yellowstone have historically depended on four critical foods: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Both whitebark pine seeds and cutthroat trout abundance have declined significantly in the past few years. The 1988 fires, blister rust, and unprecedented bark beetle outbreak have decreased the health and abundance of whitebark pine forests in Yellowstone. Cutthroat trout have also been decimated (losses greater than 90% in many important spawning streams) with the introduction of Lake Trout into Yellowstone Lake. That evidence alone suggests a greater scientific analysis of grizzly bear food source health and abundance needs to be done prior to drastic management change. Additionally cutworm moths are not a reliable food source for grizzly bears since they migrate to high elevation talus slopes from low elevation agricultural fields where they are considered a pest. Pesticides and new farming technologies such as GMO crops could dramatically reduce this grizzly bear food source. That leaves only one of four critical food sources (25%) that appears to be stable. The impact of climate change is essentially dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." There is not enough scientific evidence to validate this statement a citation of an un-referred summary publication authored by the principle author of The Rule, Dr. Servheen. It's difficult to see that as anything but bias from an outside perspective. Additionally there is ample evidence (pp. 13216 - 13217) that the Yellowstone grizzly population has already been detrimentally affected by climate change. This evidence is similarly dismissed with the statement, "grizzly bears are adaptable, they'll do just fine," of which there is little to no supporting evidence. Not to mention that in the lower 48 states, grizzly bears occupy less than 2% of their historic range. The Yellowstone grizzly bears remain completely isolated. We need a connected population of several thousand bears for true recovery and genetic viability. Removing ESA protections from Yellowstone grizzly bears is premature and violates the requisite principle of "best science" as required by law.	FWS-R6-ES-2016-0042-1513	
Not to mention that in the lower 48 states, grizzly bears occupy less than 2% of their historic range. The Yellowstone grizzly bears remain completely isolated. We need a connected population of several thousand bears for true recovery and genetic viability.	1001						Factor E	I am concerned about the removal of Endangered Species Act (ESA) protections from grizzly bears in the Greater Yellowstone region. I do not feel sufficient evidence exists to support this proposed delisting and satisfy the requirement for "best science" as required by law. It does not appear that declining food resources and climate change impacts have been sufficiently analyzed in the proposed grizzly bear delisting. Grizzly bears in Yellowstone have historically depended on four critical foods: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Both whitebark pine seeds and cutthroat trout abundance have declined significantly in the past few years. The 1988 fires, blister rust, and unprecedented bark beetle outbreak have decreased the health and abundance of whitebark pine forests in Yellowstone. Cutthroat trout have also been decimated (losses greater than 90% in many important spawning streams) with the introduction of Lake Trout into Yellowstone Lake. That evidence alone suggests a greater scientific analysis of grizzly bear food source health and abundance needs to be done prior to drastic management change. Additionally cutworm moths are not a reliable food source for grizzly bears since they migrate to high elevation talus slopes from low elevation agricultural fields where they are considered a pest. Pesticides and new farming technologies such as GMO crops could dramatically reduce this grizzly bear food source. That leaves only one of four critical food sources (25%) that appears to be stable. The impact of climate change is essentially dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." There is not enough scientific evidence to validate this statement a citation of an un-referred summary publication authored by the principle author of The Rule, Dr. Servheen. It's difficult to see that as anything but bias from an outside perspective. Additionally there is ample evidence (pp. 13216 - 13217) that the Yellowstone grizzly population has already been detrimentally affected by climate change. This evidence is similarly dismissed with the statement, "grizzly bears are adaptable, they'll do just fine," of which there is little to no supporting evidence. Not to mention that in the lower 48 states, grizzly bears occupy less than 2% of their historic range. The Yellowstone grizzly bears remain completely isolated. We need a connected population of several thousand bears for true recovery and genetic viability. Removing ESA protections from Yellowstone grizzly bears is premature and violates the requisite principle of "best science" as required by law.	FWS-R6-ES-2016-0042-1513	
Wildlife corridors are necessary before GYE grizzlies are genetically safe, and establishing corridors takes time, and has a long ways to go.	1001						Factor E	I am very much opposed to the delisting of the GYE grizzly. Delisting and turning management of grizzlies over to the states, will ultimately lead to trophy hunting, which this genetically isolated population cannot withstand. Wyoming, especially, has already geared up for trophy hunting, and bears like 399 who draw tourist money and who also wander in and out of NPs are sitting ducks. A specific outfitter has already stated that he will lie in wait for 399 to cross the park boundary and shoot her, for no reason other than she is too famous. Wildlife corridors are necessary before GYE grizzlies are genetically safe, and establishing corridors takes time, and has a long ways to go. Americans in general, oppose this delisting. Declining food resources due to climate change must figure into the decision-making. Whitebark pine, a grizzly staple, is in rapid decline, as are cutthroat trout. Although the Rule justifies delisting based on carrying capacity of the GYE, the food resource decline within the GYE, again stresses the importance of corridors into other ecosystems where grizzlies can thrive and genetically disperse. A retired AF Colonel friend of mine who passed away recently at the age of 92, lived long enough to witness the delisting of the wolf, another political rather than scientific decision. He said to me, "Vicki, if you want to understand the reasoning behind something that makes no sense, follow the money trail." Delisting the grizzly, just as the delisting of the wolf, is based on political and monetary pressure, and has little to do with scientific justification, of which there is none. The recent announcement of the illegal shooting of Scarface, bear #211 last November, is an example of how badly grizzlies are presently managed. If you want to catch a poacher, you have to announce a poaching immediately, not five months after the fact. There will certainly be more of this if states are allowed to manage grizzlies and start trophy hunting. I think it is disgraceful the way this event was handled, and I think it is WAY too early to consider delisting the GYE grizzly.	FWS-R6-ES-2016-0042-1545	

The proposed rule does nothing to address the lack of an adequate grizzly gene pool in the Yellowstone area. The existing grizzly population is to small and lacks access to other populations north of this ecosystem. There currently are no plans between Montana, Idaho or Wyoming to provide the means for grizzlies to reach other bear populations which would give them the opportunity to improve the biological diversity.	1001					Factor E	My position on the proposed rule concerning the Removal of Grizzly Bears from the Greater Yellowstone Ecosystem from the Endangered and Threatened Wildlife list is as follows: - The proposed rule does nothing to address the lack of an adequate grizzly gene pool in the Yellowstone area. The existing grizzly population is to small and lacks access to other populations north of this ecosystem. There currently are no plans between Montana, Idaho or Wyoming to provide the means for grizzlies to reach other bear populations which would give them the opportunity to improve the biological diversity. - DECLINING FOOD SOURCES: It has been documented by Wildlife Management teams that grizzlies main food sources have been wiped out due to climate change (whitebark pine), invasive species (cutthroat trout) and use of pesticides in/and near the Yellowstone Ecosystem (moths). While some waterways are being restocked with cutthroat trout, this is only a part of the necessary diet for grizzly bears. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. Montana, Wyoming and Idaho have shown themselves to be incredibly hostile toward predators. Bears trying to disperse have become victims of trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. Such is likely to be the norm after delisting. Any bear that has it's den outside the Grand Teton Park, Yellowstone Park, or on national forest lands, there is a good chance that these bears will be killed by hunters. This happened in November 2015 in Montana at the northern edge of the Yellowstone Ecosystem when a hunter, claiming self defense without proof of any aggression shown by the bear, shot and killed with one bullet, Grizzly #211, also known as Scarface, an aged grizzly (26 plus years) who happened to be in poor health. To add insult to the poaching of #211, the State of Montana withheld media release of this incident until after the comment period for the Delisting Grizzlies proposal was passed. This is exactly the kind of thing that removing Grizzlies from the Endangered List will become the norm for Montana, Wyoming and Idaho, under the guise of protecting the bears. The only protections these states want is to line their state coffers by the trophy hunters. - MOST AMERICANS OPPOSE DELISTING. Fifty-five percent of Americans are opposed to ending federal protections for the region's grizzly bears, and by a 3-to-1 margin people oppose grizzly hunting, a new poll conducted by Remington Research Group commissioned by the Humane Society of the United States and Wyoming Wildlife Advocates. - BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. As stated above, grizzlies are already being slaughtered by hunters. The claim of self-defense has yet to be verified, even after 5 months of investigation. If the Grizzly bear is delisted, further conflict with humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population.	FWS-R6-ES-2016-0042-1550	
DECLINING FOOD SOURCES: It has been documented by Wildlife Management teams that grizzlies main food sources have been wiped out due to climate change (whitebark pine), invasive species (cutthroat trout) and use of pesticides in/and near the Yellowstone Ecosystem (moths). While some waterways are being restocked with cutthroat trout, this is only a part of the necessary diet for grizzly bears.	1006	1002	1003	1004		Factor E	My position on the proposed rule concerning the Removal of Grizzly Bears from the Greater Yellowstone Ecosystem from the Endangered and Threatened Wildlife list is as follows: - The proposed rule does nothing to address the lack of an adequate grizzly gene pool in the Yellowstone area. The existing grizzly population is to small and lacks access to other populations north of this ecosystem. There currently are no plans between Montana, Idaho or Wyoming to provide the means for grizzlies to reach other bear populations which would give them the opportunity to improve the biological diversity. - DECLINING FOOD SOURCES: It has been documented by Wildlife Management teams that grizzlies main food sources have been wiped out due to climate change (whitebark pine), invasive species (cutthroat trout) and use of pesticides in/and near the Yellowstone Ecosystem (moths). While some waterways are being restocked with cutthroat trout, this is only a part of the necessary diet for grizzly bears. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. Montana, Wyoming and Idaho have shown themselves to be incredibly hostile toward predators. Bears trying to disperse have become victims of trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. Such is likely to be the norm after delisting. Any bear that has it's den outside the Grand Teton Park, Yellowstone Park, or on national forest lands, there is a good chance that these bears will be killed by hunters. This happened in November 2015 in Montana at the northern edge of the Yellowstone Ecosystem when a hunter, claiming self defense without proof of any aggression shown by the bear, shot and killed with one bullet, Grizzly #211, also known as Scarface, an aged grizzly (26 plus years) who happened to be in poor health. To add insult to the poaching of #211, the State of Montana withheld media release of this incident until after the comment period for the Delisting Grizzlies proposal was passed. This is exactly the kind of thing that removing Grizzlies from the Endangered List will become the norm for Montana, Wyoming and Idaho, under the guise of protecting the bears. The only protections these states want is to line their state coffers by the trophy hunters. - MOST AMERICANS OPPOSE DELISTING. Fifty-five percent of Americans are opposed to ending federal protections for the region's grizzly bears, and by a 3-to-1 margin people oppose grizzly hunting, a new poll conducted by Remington Research Group commissioned by the Humane Society of the United States and Wyoming Wildlife Advocates. - BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. As stated above, grizzlies are already being slaughtered by hunters. The claim of self-defense has yet to be verified, even after 5 months of investigation. If the Grizzly bear is delisted, further conflict with humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population.	FWS-R6-ES-2016-0042-1550	
Declining food resources due to climate change must figure into the decision-making. Whitebark pine, a grizzly staple, is in rapid decline, as are cutthroat trout. Although the Rule justifies delisting based on carrying capacity of the GYE, the food resource decline within the GYE, again stresses the importance of corridors into other ecosystems where grizzlies can thrive and genetically disperse.	1002	1003	1001			Factor E	I am very much opposed to the delisting of the GYE grizzly. Delisting and turning management of grizzlies over to the states, will ultimately lead to trophy hunting, which this genetically isolated population cannot withstand. Wyoming, especially, has already geared up for trophy hunting, and bears like 399 who draw tourist money and who also wander in and out of NPs are sitting ducks. A specific outfitter has already stated that he will lie in wait for 399 to cross the park boundary and shoot her, for no reason other than she is too famous. Wildlife corridors are necessary before GYE grizzlies are genetically safe, and establishing corridors takes time, and has a long ways to go. Americans in general, oppose this delisting. Declining food resources due to climate change must figure into the decision-making. Whitebark pine, a grizzly staple, is in rapid decline, as are cutthroat trout. Although the Rule justifies delisting based on carrying capacity of the GYE, the food resource decline within the GYE, again stresses the importance of corridors into other ecosystems where grizzlies can thrive and genetically disperse. A retired AF Colonel friend of mine who passed away recently at the age of 92, lived long enough to witness the delisting of the wolf, another political rather than scientific decision. He said to me, "Vicki, if you want to understand the reasoning behind something that makes no sense, follow the money trail." Delisting the grizzly, just as the delisting of the wolf, is based on political and monetary pressure, and has little to do with scientific justification, of which there is none. The recent announcement of the illegal shooting of Scarface, bear #211 last November, is an example of how badly grizzlies are presently managed. If you want to catch a poacher, you have to announce a poaching immediately, not five months after the fact. There will certainly be more of this if states are allowed to manage grizzlies and start trophy hunting. I think it is disgraceful the way this event was handled, and I think it is WAY too early to consider delisting the GYE grizzly.	FWS-R6-ES-2016-0042-1545	

The complete lack of genetic flow into the GYE will only result in the loss of allelic diversity in the future. Allele diversity is the key to adaptation, adaptation that will be required in the face of a changing climate, and therefore changing diet regime. Lack of genetic diversity is also the road to which we arrive at genetic bottle necks which will invariably result in lower reproductive rates, lower survival rates, and ultimately driving down population numbers. We ought to strive for genetic connectivity with other populations of grizzly bears so as to not negate the past several decades worth of conservation efforts.	1001	1006				Factor E	As a resident of the Greater Yellowstone Ecosystem and naturalist instructor for Yellowstone National Park, I am concerned about the potential of removing the grizzly bear from the Threatened List under the ESA. My concerns are three fold: 1. The complete lack of genetic flow into the GYE will only result in the loss of allelic diversity in the future. Allele diversity is the key to adaptation, adaptation that will be required in the face of a changing climate, and therefore changing diet regime. Lack of genetic diversity is also the road to which we arrive at genetic bottle necks which will invariably result in lower reproductive rates, lower survival rates, and ultimately driving down population numbers. We ought to strive for genetic connectivity with other populations of grizzly bears so as to not negate the past several decades worth of conservation efforts. 2. Delisting would also send a message to the public that pathetically low population numbers and range occupation is 'good enough' for the grizzly bear and potentially other organisms. What I mean exactly is that the ESA gives us legal scaffolding to compare current habitat occupation and population numbers with historic levels in order to determine candidacy for protection. While great work has been done for grizzlies, they still only reflect a fraction of historic levels. I am not endorsing we have grizzlies occupy 100% of historic range, but there is space and tolerance for grizzlies that is not filled. Let us make sure if we are delisting these animals we have set them up for success, not damned them to a zoo-like fate restricted only to our parks and surrounding areas. 3. The final concern I have is that a delisted bear will be managed by the state, which will almost certainly involve trophy hunting. Trophy hunting, by definition, is not intended to supply an individual with meat nor is it intended to benefit the animal in anyway; it is only meant to stroke the ego of the hunter (the state claims economic benefits of this practice)-further reinforcing the mentality of dominance over nature that has driven too many management decisions in the past. Let wildlife watching and seeking the 'wilderness' experience drive the economic benefits derived from grizzly, not their further demise. Trophy hunting an animal like the grizzly bear will also create bad repertoire with the animal, instead of respect and reverence. These are the three factors driving my opinion that we are not ready to delist the Yellowstone grizzly bear population.	FWS-R6-ES-2016-0042-1576	
FWS claims that the shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. But this is not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source."	1002	1003	1001			Factor E	FWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to best them. But no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claims that the shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. But this is not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. But under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. FWS claims that the agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. But when David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS claims that Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. But this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS claims that the agency looks forward to hearing from the public about delisting. Yet a recent national call on behalf of the Humane Society of the United States said:	FWS-R6-ES-2016-0042-1611	
The problems lies w/ in man's mismanagement of their food sources, White Bark Pine from climate change, the moronic illegal stocking of lake trout which feed on the brook trout which are a source of food for bears as they are shallow water fish compared to the deep water fish Lake trout are, and the use of pesticides which decimate the moth larva. In addition to this, mismanagement has relegated areas of habitat to remote islands making genetic diversity a problem.	1002	1006	1003			Factor E	Please, do not delist Grizzly Bears. They have taken 40 years to increase their number by 600, or a mere 15 bears a year. The problems lies w/ in man's mismanagement of their food sources, White Bark Pine from climate change, the moronic illegal stocking of lake trout which feed on the brook trout which are a source of food for bears as they are shallow water fish compared to the deep water fish Lake trout are, and the use of pesticides which decimate the moth larva. In addition to this, mismanagement has relegated areas of habitat to remote islands making genetic diversity a problem. This is intentional as you advocate for more space for cattle knowing they cant stay in one locale year around...obviously, neither can wildlife. Your job description clearly states you are responsible for the welfare of the land, air, water, plant life including trees, and all animals that inhabit said land. It also states lethal use is the very last option. Because of your failure to manage in a sensible fashion, you wish to dispose of a species to cover up your error and your need for greed. Caving in to the political and special interest groups whims is further proof you are not managing wildlife in the interests of animal's welfare. I propose opening up corridors and buffer zones for all wildlife and delisting possible development areas for humans. There are some things money cant buy and our future generations have to have their safety of being able to sustain life insured. Read the Public Trust Doctrine sometime...its only been in the constitution for over 200 years! Bears, wolves, cougars, and other predators are essential to our very lives in numerous ways. Just for example, of the 5 major lethal diseases devastating 30% of the cervid herds in North America today, 4 of them are transmittable to humans and are just as lethal to humans as they are to cervids. Delisting bears or any other predator is a direct threat to the safety and lives of humans. Delisting means you support the spread of rabies, Hanta Virus, Rocky Mountain Spotted Fever, Chronic Wasting Disease, Epizootic Hemorrhaging Disease, Blue tongue Virus, Bubonic Plague (500 cases every year reported in Co and NM) Lyme Disease, Dry Rot Hoof Disease, and a host of other diseases to reign amok in human populations. Medical costs cost everyone, so you are also promoting economical terrorism. Regardless what you personally believe, something bigger than us put this whole design together. The complexity of it is fascinating and overwhelming how all living thing interact together in a connective fashion is something man cannot duplicate in his wildest imagination. Because you dont understand something is not a reason to hate it or want to kill it. Nature has an excellent record of managing itself. Our record sucks! Wy, Id, and Mt have 325K square miles of area and you call 5,000 square miles of habitat (62.5 of 1%) a successful recovery management? Let me clean out your bank account and give you 63 cents back and call that humane justice! Be real men...stand up and keep Bears and other predators listed and protected. Keep this planet alive and our future generations as well. Thank you for your time.	FWS-R6-ES-2016-0042-1602	

3. Is the Yellowstone population genetically viable into the foreseeable future? It already exists in an island, and a recent article (WyoFile, April 26) notes that “grizzlies now living on some of the ecosystem edges won’t be counted in official censuses and will be moved off, killed or hunted.” Despite the fact that the ecosystem edges have habitat and are used for denning, wildlife agencies actually say “Fringe grizzly bears aren’t necessary to the ecosystem population.” This could be a huge sink for the grizzly population, rather than the fringes working as a source to the core population. Has the science been done to PROVE the fringe bears are not necessary for genetic diversity? Or is delisting going to shrink the griz population, reducing genetic viability and condemning the population to downward spiral, known to scientists as the EXTINCTION VORTEX?	1001	1002					Factor E	See attached file Attachments Comment on Grizzly Bear Delisting	FWS-R6-ES-2016-0042-1618	
6. Whitebark pine has significantly declined, research showing moderate to severe mortality within 82% of whitebark’s distribution in the Greater Yellowstone area, potentially a severe impact on food sources. Even those researchers who say the adaptable griz can find other food sources note that the loss of whitebark pine will drive grizzlies to lower elevations during the fall, increasing potential for human encounters, this during hunting season	1002						Factor E	See attached file Attachments Comment on Grizzly Bear Delisting	FWS-R6-ES-2016-0042-1618	
First, temperatures in Yellowstone already 1.4F higher they were last century. Because of those rising temperatures, we have seen a massive decline (up to 95%) in whitebark pine seeds. This is one of four important food sources for the bears and particularly impacts mother bears. If this is what 1.4 degrees has done, what will happen as temperatures continue to rise.	1006	1002					Factor E	Please do not remove Endangered Species Act protections from the grizzly bears of the Greater Yellowstone Ecosystem. These bears are at great risk from climate change, human conflict and a slow reproductive rate. First, temperatures in Yellowstone already 1.4F higher they were last century. Because of those rising temperatures, we have seen a massive decline (up to 95%) in whitebark pine seeds. This is one of four important food sources for the bears and particularly impacts mother bears. If this is what 1.4 degrees has done, what will happen as temperatures continue to rise. We simply don't know and therefore should proceed carefully. Second, a record number of bears died last year even while protected. Many of these occurred due to some human conflict - hunters, livestock operations etc. Indeed, just this week, the wildlife loving community was shocked to learn that an elk hunter killed famous Bear 299 (Scarface) last November. Why this information was withheld for so long makes one wonder. The more important point, though, is that these bears are being killed in record numbers EVEN WITH PROTECTIONS IN PLACE. Why on earth, with this escalated decline, would we remove protections at this time. Finally, grizzlies have one of the slowest reproductive rates in North America. A dramatic population decline could happen quite quickly if a few mother bears are killed. I agree with the majority of scientific experts on the grizzly delisting. "An Ohio State University master's student, Harmony Szarek, found in her thesis that nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act." Most experts do not think these bears should be delisted. Most Americans (55% according to United States Humane Society) agree. Listen to the scientific experts. Listen to the people. Don't Delist Grizzly Bears!	FWS-R6-ES-2016-0042-1644	

Grizzlies are already losing a major part of their food supply, the Whitebark pine nut, which puts them at serious risk for malnutrition and disease. Also, much of their feeding sources are in wide open areas, and delisting them will only serve to make them easy targets for game hunters and trophy shooters, putting them at serious risk for ultimate demise.	1002					Factor E	To FWS - regarding proposed rule to remove Yellowstone's grizzly bears from the Federal List of Endangered and Threatened Wildlife: Grizzlies are top predators, and are absolutely essential for keeping the Yellowstone ecological system intact. Scientists know that grizzlies are an "indicator species", and that their health and viability are crucial for a thriving ecosystem in Yellowstone. Grizzlies are already losing a major part of their food supply, the Whitebark pine nut, which puts them at serious risk for malnutrition and disease. Also, much of their feeding sources are in wide open areas, and delisting them will only serve to make them easy targets for game hunters and trophy shooters, putting them at serious risk for ultimate demise. In addition , their isolation in Yellowstone deprives them of fresh genetic input, which leads to weakness and compromised health of future generations. Instead of removing these grizzlies from the Federal List of Endangered and Threatened Wildlife, there should be an all-out effort to permanently open up safe corridors so they can travel out of the park from Yellowstone through to central Idaho and on up to the Yukon, and back. Every effort should be made to establish this. It is imperative that you DO NOT delist these bears.	FWS-R6-ES-2016-0042-1652	
Grizzly Bears need a large habitat to gather food, sleep, and mate. If grizzly bears are limited their habitat, we might see habitat destruction because the connectivity of grizzly bears to their natural habitat could have a major effect on other organisms. For example, when grizzly bears dig for food they aerate the soil, and while eating salmon they make food available for scavengers and transfer rich nutrients from the river to forest. I think this proposal does not take into account the full connections that the grizzly bears have with other species and the ecosystem.	1001					Factor E	My name is Guadalupe Cordoba. I am currently a senior at St. Mary's University. I write this letter in concern to the revision of 50 CFR 17.11 which would remove the Greater Yellowstone Ecosystem (GYE) grizzly bear to a distant population segment (DPS) from the Federal List of Endangered and Threatened Wildlife. I think this is a great mistake. For example, it has been proven that grizzly bears are an umbrella species, meaning that because they require a large habitat, this protects other organisms living in the same habitat as the grizzly bears. I understand that long-term conservation monitoring will be taken place, however, this would only monitor the grizzly bear population and not the different organisms that live in the habitat of the grizzly bears. According to this proposal, the Interagency Grizzly Bear study Team (IGBST) will continue to monitor habitat standards and adherence to the 1998 baseline. Although, a continuation to monitor the abundance, and distribution of grizzly bear foods will still just focus on one species. Like I mention earlier, the grizzly bear being on the list of endangered species has allowed many organisms to continue to stay in their habitat. In the book "Spine of the Continent: The Race to Save America's Last, Best Wilderness" by Mary Ellen Hannibal emphasize the importance of having connectivity. Animals need corridors to do their natural migrations and potential connect different populations of grizzly bears. Grizzly Bears need a large habitat to gather food, sleep, and mate. If grizzly bears are limited their habitat, we might see habitat destruction because the connectivity of grizzly bears to their natural habitat could have a major effect on other organisms. For example, when grizzly bears dig for food they aerate the soil, and while eating salmon they make food available for scavengers and transfer rich nutrients from the river to forest. I think this proposal does not take into account the full connections that the grizzly bears have with other species and the ecosystem. When a land is divided into different small patches of land, fragmented, large animals like the grizzly bears would not be able to survive. In a study by William Newmark in 1987 he said that even though a species is protected, it will not survive if they are not able to move freely. Having boundaries just limits the connectivity of the animals and affects their population and others species who depend on the habitat of the larger species like the grizzly bears. The grizzly bears being part of the Endangered and Threatened list allows the grizzly bear to have the large habitat they need. Also, as humans, we need to think about the ethics regarding the ability we have to control and alter the habitat of so many species. Aldo Leopold in his book, "Sand County Almanac" suggested that we should appreciate and protect wildlife because of its intrinsic value. That we should think of how great nature is because its nature. Also, we should think of the cultural diversity of the natural systems aside from what resources nature has to offer for people. He says that instead of trying to be the owners of nature we should be the stewards of nature. We should enjoy being part of nature, the home to all living organisms including humans. If we look at it this way, we should try to protect the grizzly bears because of their importance to the ecosystem.	FWS-R6-ES-2016-0042-1667	
However, just because the population has reached a certain set number does not mean they lack vulnerabilities. One such vulnerability is climate change. The issue of climate change is addressed in the proposal with the conclusion of having little impact on the bears. Grizzly Bears used to range from Northern Canada to Northern Mexico, a vast expanse of land known to many as the "Spine of the Continent." However, Grizzly bears are also creatures of the cold and with the rise in global temperature, their comfortable habitat range will continually be expurgated Northward. Climate change has also decline snowfall in certain areas; snowfall is important to Grizzlies as they inhabit dens where snow is unlikely to melt in warmer temperatures. As noted in the proposal, many Grizzly Bear biologists within this region do not believe climate change will affect the species. Though resilient and hardy creatures, by taking them off the Endangered and Threatened Species list, we are asking them to adapt to climate change as a whole species.	1006					Factor E	See attached file(s) Attachments Grizzlybears	FWS-R6-ES-2016-0042-1670	

I have not seen any climate change impact study completed showing the impact on the current grizzly population. It has taken over 40 years to rebuild the grizzly population and they could be greatly impacted by climate change and their ability to survive if changes continue to negatively impact their food source such as it has with the Whitebark Pine.	1006	1002				Factor E	As a tax payer I would like to make my concerns known about any management plan to delist the Yellowstone Grizzlies. I am opposed for the following key reasons. 1. I have not seen any climate change impact study completed showing the impact on the current grizzly population. It has taken over 40 years to rebuild the grizzly population and they could be greatly impacted by climate change and their ability to survive if changes continue to negatively impact their food source such as it has with the Whitebark Pine. 2. Other food sources are declining as well due to other environmental reasons such as the Cutthroat Trout being lost due to invasive species taking over and moths are increasingly unreliable due to man's use of pesticides. These three primary food sources for grizzlies in decline mean that the current grizzly population will already be under stress to continue to survive without hunters being allowed to kill them as well. 3. Grizzly bears are already facing these hardships and coupled with being one of the slowest reproducing mammals we have in the United States it is a certainty that the killing of females would decimate the population within a very short period of time. Grizzlies have already lost 99% of their range. Yellowstone is one of the last of their territories in the continental United States and we must be cognizant of that fact if hunting is allowed and they cannot sustain reproduction. 4. While the vast majority of Americans, 90% by a national poll, support the Endangered Species Act, hunters have historically had the "ear" of state management and have been allowed to hunt species to near extinction, we must reverse this hostile management style in Yellowstone as many more people visiting this beautiful National Park want to see LIVE bears. Case in point: bear 399, a female that thousands upon thousands of visitors from the US and around the world come back to see year after year with her cubs. The hunting clubs already have a target on her back and this does not bode well for Yellowstone tourism as well as the grizzly bear population as a whole. As well as wanting to preserve the endangered species Act, most Americans also oppose delisting the Yellowstone grizzlies. Only 26% of Americans actually want to delist the grizzly. The vast majority again want and expect the USFWS to do their job and continue to protect the wildlife under their care. 5. A record number of Yellowstone area grizzly bears were already killed in 2015 despite Endangered Species Act protections. The grizzly population is already being removed for increased conflicts with ranchers and illegal hunting as they roam further out to look for food sources to compensate for their primary food sources being affected by climate change and other environmental impacts. As a result of these increased numbers of grizzly bear killings, it is far too early to delist them without further study and discussion of other management plans.	FWS-R6-ES-2016-0042-1750	
Other food sources are declining as well due to other environmental reasons such as the Cutthroat Trout being lost due to invasive species taking over and moths are increasingly unreliable due to man's use of pesticides. These three primary food sources for grizzlies in decline mean that the current grizzly population will already be under stress to continue to survive without hunters being allowed to kill them as well.	1003	1004				Factor E	As a tax payer I would like to make my concerns known about any management plan to delist the Yellowstone Grizzlies. I am opposed for the following key reasons. 1. I have not seen any climate change impact study completed showing the impact on the current grizzly population. It has taken over 40 years to rebuild the grizzly population and they could be greatly impacted by climate change and their ability to survive if changes continue to negatively impact their food source such as it has with the Whitebark Pine. 2. Other food sources are declining as well due to other environmental reasons such as the Cutthroat Trout being lost due to invasive species taking over and moths are increasingly unreliable due to man's use of pesticides. These three primary food sources for grizzlies in decline mean that the current grizzly population will already be under stress to continue to survive without hunters being allowed to kill them as well. 3. Grizzly bears are already facing these hardships and coupled with being one of the slowest reproducing mammals we have in the United States it is a certainty that the killing of females would decimate the population within a very short period of time. Grizzlies have already lost 99% of their range. Yellowstone is one of the last of their territories in the continental United States and we must be cognizant of that fact if hunting is allowed and they cannot sustain reproduction. 4. While the vast majority of Americans, 90% by a national poll, support the Endangered Species Act, hunters have historically had the "ear" of state management and have been allowed to hunt species to near extinction, we must reverse this hostile management style in Yellowstone as many more people visiting this beautiful National Park want to see LIVE bears. Case in point: bear 399, a female that thousands upon thousands of visitors from the US and around the world come back to see year after year with her cubs. The hunting clubs already have a target on her back and this does not bode well for Yellowstone tourism as well as the grizzly bear population as a whole. As well as wanting to preserve the endangered species Act, most Americans also oppose delisting the Yellowstone grizzlies. Only 26% of Americans actually want to delist the grizzly. The vast majority again want and expect the USFWS to do their job and continue to protect the wildlife under their care. 5. A record number of Yellowstone area grizzly bears were already killed in 2015 despite Endangered Species Act protections. The grizzly population is already being removed for increased conflicts with ranchers and illegal hunting as they roam further out to look for food sources to compensate for their primary food sources being affected by climate change and other environmental impacts. As a result of these increased numbers of grizzly bear killings, it is far too early to delist them without further study and discussion of other management plans.	FWS-R6-ES-2016-0042-1750	
The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations, endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate bears from other populations into the GYE to improve genetic diversity but this has not occurred.	1001					Factor E	I am apposed to delisting grizzly bears in the Greater Yellowstone Ecosystem (GYE) for the following reasons: 1. The fact is that no one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services numbers. But what we do know is that at least 60 grizzlies died last year, mostly at the hand of man, and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest, if not the lowest reproductive rate of any mammal in the GYE. The continuation of such mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work needs to be done in the GYE to prevent many of these grizzly deaths before this population can be safely delisted. Such actions as mandating that ranchers remove their garbage and carcass dumps to county facilities, the use of bear-proof garbage cans in communities, camping areas, etc. within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for hunters and other public land users in grizzly habitat need to be implemented within the GYE before grizzlies are delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations, endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate bears from other populations into the GYE to improve genetic diversity but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat in the GYE and prevent them from colonizing other lands in which they were originally found. This will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of this land is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead should be "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout and possibly even army cutworm moths populations have recently been significantly reduced due to a variety of human caused issues. More research is needed to determine how the loss of these food sources will impact the future grizzly population in the GYE. 4. GYE Grizzlies should be managed as an ecosystem population rather than separately by three different states, all of which have stated their desire to significantly reduce the population and limit their occupied habitat. 5. Recent studies have shown that GYE Grizzly Bears are a currently important, and significantly rising economic resource to GYE communities. Yellowstone National Park visitors have listed grizzlies and wolves as the two most important species they want to be able to observe due to their scarcity. ~~More national park visitors come specifically to see these two predators. We have no such place valuable to the GYE ecosystem.~~	FWS-R6-ES-2016-0042-1765	

Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout and possibly even army cutworm moths populations have recently been significantly reduced due to a variety of human caused issues. More research is needed to determine how the loss of these food sources will impact the future grizzly population in the GYE.	1002	1003	1004			Factor E	I am apposed to delisting grizzly bears in the Greater Yellowstone Ecosystem (GYE) for the following reasons: 1. The fact is that one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services numbers. But what we do know is that at least 60 grizzlies died last year, mostly at the hand of man, and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest, if not the lowest reproductive rate of any mammal in the GYE. The continuation of such mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work needs to be done in the GYE to prevent many of these grizzly deaths before this population can be safely delisted. Such actions as mandating that ranchers remove their garbage and carcass dumps to county facilities, the use of bear-proof garbage cans in communities, camping areas, etc. within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for hunters and other public land users in grizzly habitat need to be implemented within the GYE before grizzlies are delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations, endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate bears from other populations into the GYE to improve genetic diversity but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat in the GYE and prevent them from colonizing other lands in which they were originally found. This will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of this land is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead should be "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout and possibly even army cutworm moths populations have recently been significantly reduced due to a variety of human caused issues. More research is needed to determine how the loss of these food sources will impact the future grizzly population in the GYE. 4. GYE Grizzlies should be managed as an ecosystem population rather than separately by three different states, all of which have stated their desire to significantly reduce the population and limit their occupied habitat. 5. Recent studies have shown that GYE Grizzly Bears are a currently important, and significantly rising economic resource to GYE communities. Yellowstone National Park visitors have listed grizzlies and wolves as the two most important species they want to be able to observe due to their scarcity. ~~Management decisions come specifically to on these issues, and have been so much more valuable to the GYE economy~~	FWS-R6-ES-2016-0042-1765	
The issue of white bark pine mortality, cut throat trout decline and pesticide-targeted moth population sustainability is showing that changing feeding habits can result in more conflicts due to shifting diet preference. This places bears at even greater even greater risk than only a few years back.	1002	1003				Factor E	See attached file(s) Attachments Grizzly Bear Delisting Proposal Attn	FWS-R6-ES-2016-0042-1757	
With the decline of the food sources for the grizzly--moths are affected by pesticides, the cutthroat trout due to the lake trout, and of course most of the white bark pines have been lost to disease.	1004	1003	1002			Factor E	See Attached Attachments Bullinger Broke	FWS-R6-ES-2016-0042-1787	

The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing." This could cause hungry bears to look for food and be shot the minute they step outside Yellowstone.	1006					Factor E	Delisting grizzly bears in the Greater Yellowstone Ecosystem (GYE) will enable Montana, Idaho, & Wyoming to initiate "sport hunting" of grizzlies. Trophy hunting/sport hunting has never been about managing populations. It is about hunting for sport and trophies. They don't give a damn about the population. They will hunt them until they are gone and you know it. Furthermore, nobody, including you, really knows how many grizzlies there are in the GYE. "The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing." This could cause hungry bears to look for food and be shot the minute they step outside Yellowstone. http://ricklamplugh.blogspot.com/2016/04/you-can-write-comment-that-helps-save.html So, I say to you, maintain GYE grizzly bear protections. Keep them on the list. Your attempt to delist GYE grizzly bears in the first place is an abrogation of your responsibilities under the Endangered Species Act. Since we do not know how many there actually are, that they are most probably declining with the decline of their food sources, and delisting would certainly allow Montana, Idaho, & Wyoming to initiate sport hunting in Yellowstone is a travesty of the protections afforded by the Endangered Species Act. Therefore, they must stay under the protection of the Endangered Species Act.	FWS-R6-ES-2016-0042-1817	
I do not get to graze my animals on land I do not own, there are no public lands or subsidies lent to me to help me feed my herds. Free roaming dogs have killed more than a dozen of my calves and 20 of my ewes in the last 10 years, there is no federal money for that and dogs are not crazily shot upon sight... The same is NOT true of incidents involving mountain lions, wolves, coyotes or bears. When the ranchers out there decide that a bear they have only SEEN in passing or merely seen evidence of its presence, even if it hasn't inflicted ANY damage upon them, but they see it as a threat, they will happily shoot it to remove the risk or fear of risk. The national averages for that area are that 24-40% of calves/cattle are lost to respiratory disease, less than 0.03% are lost to predation - ranchers can report ANY carcass feeding from these predators that are often scavengers as predation, they are likely to get federal monies to reimburse the value of that animal. There is NOT a rational nature to fear	1009					Factor E	The states that you propose to hand over grizzly bear control and management to have a proven track record of supporting sport killing of other delisted species such as wolves. They had no regard for radio collared, research project or other animals. These states have crippled the pronghorn migratory routes, seen their ecosystem destroyed by cattle and feral horses. To trust the fate of the grizzly bears to these states is basically handing the bears a death certificate. I am a veterinarian as well as a sheep and cattle farmer in central KY. I do not get to graze my animals on land I do not own, there are no public lands or subsidies lent to me to help me feed my herds. Free roaming dogs have killed more than a dozen of my calves and 20 of my ewes in the last 10 years, there is no federal money for that and dogs are not crazily shot upon sight... The same is NOT true of incidents involving mountain lions, wolves, coyotes or bears. When the ranchers out there decide that a bear they have only SEEN in passing or merely seen evidence of its presence, even if it hasn't inflicted ANY damage upon them, but they see it as a threat, they will happily shoot it to remove the risk or fear of risk. The national averages for that area are that 24-40% of calves/cattle are lost to respiratory disease, less than 0.03% are lost to predation - ranchers can report ANY carcass feeding from these predators that are often scavengers as predation, they are likely to get federal monies to reimburse the value of that animal. There is NOT a rational nature to fear. I have NO belief that these states will handle grizzly bears in a responsible manner. Shoot first and don't ask any questions IS NOT the way to deal with bears. I urge you do NOT delist bears. It will be a tragedy for the remaining bears.	FWS-R6-ES-2016-0042-1796	
The proposed delisting does not address the genetic isolation of Yellowstone grizzlies. The Yellowstone area population gene pool is too small and is disconnected from populationsto the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution,making connectivity all that much less likely. Please keep these points in mind when making any decision on delisting of the grizzly in the Yellowstone ecosystem.	1001					Factor E	I'm writing to comment on the proposal to remove the Greater Yellowstone Grizzly Bear from the Federal List of Endangered and Threatened Wildlife. As we saw with Scarface, grizzly bears will be killed even if they remain protected. In 2015, a record number of Yellowstone bears were killed. It is premature to delist now. We should wait and see how these removals impact the overall population. If hunting is permitted, there should be a moratorium until states can absolutely prove they can manage the grizzly population to keep it at least at current levels. There must be buffer zones around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park. As you know, grizzlies are one of the slowest reproducing mammals. As a result, loss of several females in a year would be devastating for the population. Most Americans oppose delisting of the grizzly bear. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The proposed delisting does not address the genetic isolation of Yellowstone grizzlies. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Please keep these points in mind when making any decision on delisting of the grizzly in the Yellowstone ecosystem.	FWS-R6-ES-2016-0042-1820	

We have not fully gained the knowledge and evidence that the declining amount of white bark pine, cutthroat trout and other food sources for grizzly bears will not affect their long-term survival and numbers. Additionally, it can not be underestimated that the effects of climate change will continue to poorly affect the numbers and longevity of grizzly bears in the lower 48.	1002	1003	1006				Factor E	To Fish and Wildlife Services and others concerned with this issue, I am writing to oppose Grizzly delisting and hope that the bigger picture of scientific evidence will be considered. This consideration is premature on many scientific levels. We have not fully gained the knowledge and evidence that the declining amount of white bark pine, cutthroat trout and other food sources for grizzly bears will not affect their long-term survival and numbers. Additionally, it can not be underestimated that the effects of climate change will continue to poorly affect the numbers and longevity of grizzly bears in the lower 48. Grizzly numbers are still at a level of uncertainty and are susceptible to many variables from year to year. The fact that nearly 60 bears were killed alone in 2015 while still protected exemplifies this instability. (known deaths) I am greatly disturbed by the recent decision of the FWS to very belatedly notify the public of the killing of a grizzly bear that occurred in November 2015. This is atrocious. The public deserves answers, facts and timely information rather than politics. Decisions like this do not provide for public trust and faith in the various agencies or states to protect grizzlies if delisted. Additionally, it is worrisome and inappropriate that the loss of habitat for grizzlies due to human encroachment is not being considered part of the factor in maintaining quality numbers of grizzlies over the long term. Human-bear conflict most often results in the dispatching of the bear...to delist the grizzly ignores the fact that grizzly bears need large amounts of habitat to exist and thrive. Their protection under the ESA allows for better management and public restraint and education when human-bear ranges overlap. These are just a few of the reasons against de-listing. Scientifically, ethically, and environmentally it is premature and unsound to delist the grizzly bear.	FWS-R6-ES-2016-0042-1827	
With our climate change effecting our weather or a major fire through Yellowstone and its ecosystem could effect these grizzlies where it might be too late to bring them back from extinction.	1006						Factor E	I support keeping grizzlies on the Endangered Species Act. Their numbers are still low and and they should never be hunted for trophies and when money is involved. Nor should they be controlled by the governors of the states surrounding our national parks. Nor the cattle industry, NRA or any politicians especially from back east. With our climate change effecting our weather or a major fire through Yellowstone and its ecosystem could effect these grizzlies where it might be too late to bring them back from extinction. Plus there have been too many of them killed off already and no one has paid a penalty for it. There is a lot of Shoot, Shovel and Shut up going on that we don't hear about that is going on. Where is our law enforcement. They are getting paid but not doing their job and if they are it's letting hunters shoot grizzlies in our national parks and in their ecosystem where it's illegal. Use the bear spray and not the rifle. The national parks belong to the people that enjoy the scenery and wildlife and not for the hunters who want to kill, kill, kill. Do not delist the grizzly bears.	FWS-R6-ES-2016-0042-1830	
Thanks to the protections of the Endangered Species Act, she noted their number today has risen slowly to around 700. But she cautioned, that their future isn't secure yet because they face so many threats to their survival - two of their four major foods have all been but wiped out, due to climate change, disease and invasive species and they may be killed if they prey on livestock in their increasingly difficult search for food.	1006	1000					Factor E	Recently, renowned conservationist Dr. Jane Goodall delivered remarks before members of the House Natural Resources Committee in Washington DC. She spoke of her love for famous Jackson Hole Grizzly 399 and proposals to remove Greater Yellowstone Grizzlies from federal protection under the Endangered Species Act. Not surprisingly, Dr. Goodall was shocked to hear about the proposal and found it "hard to believe". She said that she's met Grizzlies in Yellowstone and also up close in Alaska. Like so many people she was deeply impressed. For her, she said the Grizzlies, along with the wolf, symbolize the American wilderness-the land and the animals she read about as a child. She stated that she has learned a lot about them-their remarkable intelligence, their differing personalities, their close family bonds and their relationship with the land. "Many Native American tribes revere them - think of them as teachers". She credited the Endangered Species Act in 1975 for saving the Grizzlies of the Greater Yellowstone Ecosystem who numbered less than 150 individuals at that time. Thanks to the protections of the Endangered Species Act, she noted their number today has risen slowly to around 700. But she cautioned, that their future isn't secure yet because they face so many threats to their survival - two of their four major foods have all been but wiped out, due to climate change, disease and invasive species and they may be killed if they prey on livestock in their increasingly difficult search for food. During her visit to Yellowstone, with photographer Tom Mangelsen, she met the famous mother known only as 399 and her triplets. Many of the thousands of people who flock to Yellowstone are hoping to meet her and she saw how calm 399 was amongst the crowds. She noted that 399 and the other Yellowstone Grizzlies boost the tourist industry which does wonders for the economy - "and that is over and above the intense delight that people feel when they encounter 399 and the other Grizzlies of the area". Unfortunately, she learned that 399 is one of the bears who sometimes moves out of the protected area in search of food. Dr. Goodall fears that if the Grizzlies are delisted and the state opens a hunting season 399 might be shot by a Trophy Hunter "so that her head could be mounted on a wall- her skin laid on the floor for human feet to trample". At the thought of this tragic reality Dr. Goodall poignantly commented, "I think many hearts would break-I know mine would." Please do not break the hearts of millions of people by delisting these beloved and noble Bears.	FWS-R6-ES-2016-0042-1819	

"Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." A	1001	1002				Factor E	I most adamantly oppose your agency's proposal to strip Endangered Species Act protection from the Greater Yellowstone Ecosystem grizzly bear rebutting each of your claims for wanting to do so. You claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." You claim: The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. You claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yaak region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. You claim: Your agency will stay involved with protecting the grizzly population after delisting. The reality: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting	FWS-R6-ES-2016-0042-1835	
The most salient argument against delisting is the collapse of the grizzlies' food system. By far the most important source of nutrition for the bears has been the seeds of the whitebark pine tree, but the whitebark is under a double attack. The native mountain pine beetle has historically been kept in check by periodic deep freezes, but there haven't been any of those for years now. The other attacker is the deadly, non-native white pine blister rust. More than 95 percent of the whitebarks are now dead.	1002					Factor E	ran the author of the "Grizzly Bear," first published by "Antea" in 1984 and republished seven times, most recently in 1997 by Lyons and Burford. It was called "a classic" by the New York Times and is still considered the definitive book on the Yellowstone grizzly bear population. I am also a former chairman of the Greater Yellowstone Coalition as well as a former partner in a cattle ranch within the Greater Yellowstone Ecosystem which is seasonally occupied grizzly bear habitat. The proposed end of federal protection of the Yellowstone grizzly bear is trumpeted in some quarters as one of the great triumphs of the Endangered Species Act. In fact it would be a spurious victory. The most salient argument against delisting is the collapse of the grizzlies' food system. By far the most important source of nutrition for the bears has been the seeds of the whitebark pine tree, but the whitebark is under a double attack. The native mountain pine beetle has historically been kept in check by periodic deep freezes, but there haven't been any of those for years now. The other attacker is the deadly, non-native white pine blister rust. More than 95 percent of the whitebarks are now dead. Until recent years, early each summer there were vast runs of spawning cutthroat trout up the tributaries of Yellowstone Lake high-fat feast for grizzlies. Since the illegal introduction of non-native lake trout, however, which feed on juvenile cutthroats, the spawning runs are down by 90 percent. A less well understood but equally grave danger is that Yellowstone grizzlies live on what is effectively an island. Island populations are subject to inbreeding and hence lowered reproduction ratesand grizzlies are already among the least fecund mammals, rarely producing young until the age of five, with litters of two cubs most common, typically three years apart. When island populations dip, they cannot be resupplied by adjacent populations, because there aren't any. The study of island biogeography has found that islands always have higher rates of extinction. Grizzlies are notoriously hard to count, and some independent scientists have challenged the studies on which the government has based its population assessmentsnot only of present numbers but of projected ones. Their analyses indicate that the population is already declining. The increasingly far-right legislatures of Idaho, Montana, and Wyoming are thirsty for the bear management control that would come to their fish and game departments with delisting the Yellowstone grizzly. The bears would be hunted. Their numbers and the extent of their range would inevitably be reduced. Opponents of delisting cite what happened when Yellowstone's gray wolves came under state management. Montana has been pretty good, but conservationists claim that Idaho's approach, at least in some parts of the wolves' range, has been not far short of outright slaughter, and Wyoming decreed that outside a zone encircling Yellowstone and its adjacent protected lands, the rest of the state would be a year-round free-fire zone. Grizzly bear management by these three states, based on their previous behavior, seems likely to reduce an already declining population with a declining food base. The only way Yellowstone's grizzly bears can be expected to thrive in the long run is for their ecosystem to be connected by a habitat corridor to other grizzly populationthe one centered on Glacier National Park and others up the Rocky Mountain chain to Alaska. That is still	FWS-R6-ES-2016-0042-1832	
Until recent years, early each summer there were vast runs of spawning cutthroat trout up the tributaries of Yellowstone Lake high-fat feast for grizzlies. Since the illegal introduction of non-native lake trout, however, which feed on juvenile cutthroats, the spawning runs are down by 90 percent.	1003					Factor E	ran the author of the "Grizzly Bear," first published by "Antea" in 1984 and republished seven times, most recently in 1997 by Lyons and Burford. It was called "a classic" by the New York Times and is still considered the definitive book on the Yellowstone grizzly bear population. I am also a former chairman of the Greater Yellowstone Coalition as well as a former partner in a cattle ranch within the Greater Yellowstone Ecosystem which is seasonally occupied grizzly bear habitat. The proposed end of federal protection of the Yellowstone grizzly bear is trumpeted in some quarters as one of the great triumphs of the Endangered Species Act. In fact it would be a spurious victory. The most salient argument against delisting is the collapse of the grizzlies' food system. By far the most important source of nutrition for the bears has been the seeds of the whitebark pine tree, but the whitebark is under a double attack. The native mountain pine beetle has historically been kept in check by periodic deep freezes, but there haven't been any of those for years now. The other attacker is the deadly, non-native white pine blister rust. More than 95 percent of the whitebarks are now dead. Until recent years, early each summer there were vast runs of spawning cutthroat trout up the tributaries of Yellowstone Lake high-fat feast for grizzlies. Since the illegal introduction of non-native lake trout, however, which feed on juvenile cutthroats, the spawning runs are down by 90 percent. A less well understood but equally grave danger is that Yellowstone grizzlies live on what is effectively an island. Island populations are subject to inbreeding and hence lowered reproduction ratesand grizzlies are already among the least fecund mammals, rarely producing young until the age of five, with litters of two cubs most common, typically three years apart. When island populations dip, they cannot be resupplied by adjacent populations, because there aren't any. The study of island biogeography has found that islands always have higher rates of extinction. Grizzlies are notoriously hard to count, and some independent scientists have challenged the studies on which the government has based its population assessmentsnot only of present numbers but of projected ones. Their analyses indicate that the population is already declining. The increasingly far-right legislatures of Idaho, Montana, and Wyoming are thirsty for the bear management control that would come to their fish and game departments with delisting the Yellowstone grizzly. The bears would be hunted. Their numbers and the extent of their range would inevitably be reduced. Opponents of delisting cite what happened when Yellowstone's gray wolves came under state management. Montana has been pretty good, but conservationists claim that Idaho's approach, at least in some parts of the wolves' range, has been not far short of outright slaughter, and Wyoming decreed that outside a zone encircling Yellowstone and its adjacent protected lands, the rest of the state would be a year-round free-fire zone. Grizzly bear management by these three states, based on their previous behavior, seems likely to reduce an already declining population with a declining food base. The only way Yellowstone's grizzly bears can be expected to thrive in the long run is for their ecosystem to be connected by a habitat corridor to other grizzly populationthe one centered on Glacier National Park and others up the Rocky Mountain chain to Alaska. That is still possible, if the spawning runs are protected, which they are not today. To take away the bears' federal protection now with their	FWS-R6-ES-2016-0042-1832	

The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout.	1002	1003	1006			Factor E	The proposal to delist Yellowstone Grizzly Bears is irresponsible and will result in the decimation of our Country's iconic symbol of the West. For the following reasons below the proposal to delist must be abandoned: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. 2. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout. 3. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. The population will decline after delisting, and cannot be sustained without life-support measures. 4. The delisting plan fails to address issues associated with high, ongoing human caused grizzly bear mortality. Most of the grizzly bears that die in the Greater Yellowstone Ecosystem die of human causes, and most are avoidable. While Yellowstone Park and some communities outside the park have gone to enormous measures to remove grizzly bear attractants, others have not. The problem of mortality of food-habituated bears will only get worse after delisting, when allowable mortality levels are raised, and resources for conflict resolution are reduced. Because problem grizzly bears are a human safety problem, it only makes sense to resolve the ongoing sanitation issues in the ecosystem before delisting. 5. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public. 6. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources. Please keep the Yellowstone Grizzlies protected! Do not delist them!	FWS-R6-ES-2016-0042-1912	
Finally, delisting the bears is not the only way to address the legitimate concerns of landowners who incur livestock losses. I recommend requesting the responsible agency in the federal government to approve an increase to the entrance fees into Yellowstone National Park, with some or all of the increased income designated as compensation for those landowners in the Yellowstone ecosystem for losses they incur due to wolves and grizzlies. The amount by which entrance fees should be increased would depend upon the anticipated total payments to compensated the affected landowners in the ecosystem. Please note that fees were raised for some national parks (but not for Yellowstone) last year (http://www.pbs.org/newshour/rundown/u-s-raises-entrance-fees-national-parks/).	1009					Factor E	See attached file(s) Attachments Angresano Grizzly Request	FWS-R6-ES-2016-0042-1840	
Reduced high value food supplies due to the loss of Yellowstone Cutthroat Trout, Whitebark Pine Nuts, and the significant reduction in the Yellowstone Northern Elk Herd have decreased the upward trajectory of this population of Grizzly Bears. In fact the population increase has been static for the last ten years while human caused threats identified have not been addressed. This has resulted in increased mortality that cannot sustain the population long term. Increased human population, especially to the north and east of Yellowstone National Park has resulted in increased hunting pressure on Elk resulting in Grizzly Bear deaths due to conflicts with Grizzly Bears during hunting season.	1003	1002	1005			Factor E	While I was the BLM Dillon Field Manager, I served as the Montana BLM representative to the IGBC Yellowstone Ecosystem Subcommittee for ten years (2002-2012). Great strides have been made in increasing the Yellowstone sub population of Grizzly Bears, however more work is needed to reduce threats to this population of Grizzly Bears. Reduced high value food supplies due to the loss of Yellowstone Cutthroat Trout, Whitebark Pine Nuts, and the significant reduction in the Yellowstone Northern Elk Herd have decreased the upward trajectory of this population of Grizzly Bears. In fact the population increase has been static for the last ten years while human caused threats identified have not been addressed. This has resulted in increased mortality that cannot sustain the population long term. Increased human population, especially to the north and east of Yellowstone National Park has resulted in increased hunting pressure on Elk resulting in Grizzly Bear deaths due to conflicts with Grizzly Bears during hunting season. Continued domestic sheep grazing on USDA public lands in the Centennial and Gravelly Mountains of Southwest Montana have resulted in Grizzly Bear deaths and are prohibiting the genetic connection between the Northern Continental Divide and Yellowstone Ecosystems. Sport hunting of the Yellowstone Grizzly Bear cannot be justified due to increase risks that are not addressed and increasing mortality of these bears. Funding to address these increasing risks are not available to either the three states nor to the federal land management agencies where these bears reside. Nor is it likely that funding will be made available to the states or federal land management agencies in the future to address these increasing risks. States don't even require hunters to carry bear spray while hunting big game in hunting units occupied by grizzly bears. Until there is a substantial increase in the efforts to reduce risks to the Yellowstone Grizzly Bear I don't believe the Yellowstone Grizzly should be delisted.	FWS-R6-ES-2016-0042-1958	

he x shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. Å x Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Å The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Å	1002	1003	1001	1000		Factor E	Thank you for allowing public comment on this Proposed issue: The shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Plus, the GYE is an isolated "island" where species diversity is limited because corridor for new genetic are shut down because of human inter mention (i.e. road, ranches, etc) GYE region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. FWS will stay involved with protecting the grizzly population after delisting. In the form of a leaked memo, the 3 states said that they will open up trophy hunting seasons for the bears. I believe that opening such seasons is a prime motivation for the states in pushing for de-listing. If you look at what each state is doing to manage wolves, it is clear that they will only allow the minimum numbers of individuals to survive, nothing more. Relying on state agencies, that have shown a deep hatred towards any predator shall NOT be allowed or given a chance to manage a endangered species. FWS claim that they will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. ~~to that, FWS will have spent more than 40 years securing the grizzly population, only to see it re-endangered in a couple of years of~~	FWS-R6-ES-2016-0042-1922	
As noted by The Sierra Club, the bears' naturally slow reproductive rates and loss of key food sources due to climate change already present this majestic animal with some serious challenges.	1000	1006				Factor E	Do not remove the Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. As noted by The Sierra Club, the bears' naturally slow reproductive rates and loss of key food sources due to climate change already present this majestic animal with some serious challenges. Removing the Grizzly from the Federal List of Endangered and Threatened Wildlife at this time would be premature in light of the potential effects such other serious challenges.	FWS-R6-ES-2016-0042-2228	
People need to learn how to behave around these animals so we can all remain safe, includingthe animals.	1008					Factor E	As a resident of California, and someone who wishes she had seen a grizzly in the wild, here in California, I beg you to protect these beautiful animals. California has a grizzly on it's flag because they once roamed this state, wild and free. They are now extinct in this state. They only live in a few places. Trophy hunting is appalling to me. It goes against everything I believe in. Wild animals deserve to be wild. To hunt an animal, simply for it's hide or it's head is beyond comprehension. Especially when there are so few left in the wild. If the numbers are lowered to the point where genetic diversity is compromised, then you will have issues with the animals health. The wolves were hunted to extinction in Yellowstone and so many other animals began to over populate that the wolves were re-introduced. Now they are being hunted as well. If we do not look at the historical evidence, we are a doomed planet. The wild horses are being hunted to make room for cattle. The wolves are being hunted, to make room for cattle. The bison are killed because of the remote possibility they might make the cattle sick (not scientifically proven) but in reality, it's because they might eat grass the cattle would eat. As an American and an animal lover, I want my voice heard. Please take a look at the situation with an eye to the past. California has no more grizzlies. I had to go to Alaska to see one in the wild. It took my breath away. Such a magnificent animal. The bison in Yellowstone took my breath away when I saw them, as did the one lone wolf I saw. Do not remove the grizzly bear from the list of endangered species. They are not only representative of this great land but they are an important part of the food chain and the ecosystem. People need to learn how to behave around these animals so we can all remain safe, including the animals.	FWS-R6-ES-2016-0042-2239	

there are threats to their already slow reproductive rates that have not been adequately studied or addressed; including climate change. While some limited studies have shown that adequate alternate food sources may make up for the decline in white pine bark, the full effect on the ecosystem has not yet been realized.	1006	1002				Factor E	The delisting of the Grizzly bear from the endangered and threatened wildlife list would be detrimental to it's apparent recovery. Sufficient regulatory stipulations allowing the hunting of these animals does not exist, and would be expensive and cumbersome to enforce for states wildlife officials. There are no "buffer zones" preventing hunters from enticing roaming bears out of the National Park areas. Additionally, there are threats to their already slow reproductive rates that have not been adequately studied or addressed; including climate change. While some limited studies have shown that adequate alternate food sources may make up for the decline in white pine bark, the full effect on the ecosystem has not yet been realized. It is my opinion that delisting at this time would be a catastrophic mistake.	FWS-R6-ES-2016-0042-2371	
We don't know what effects climate change will have on the bear's food sources.	1006					Factor E	See Attached Attachments Carson Millie	FWS-R6-ES-2016-0042-2459	
the bear's regular sources of food are on the decline with the demise of Yellowstone cutthroat trout, and whitebark pine cones!	1002	1003				Factor E	See Attached Attachments Carson Millie	FWS-R6-ES-2016-0042-2459	

what's the rush to delist the bear, especially now, where we might be at critical tipping point with climate change? Sixty days is certainly not enough to adequately review the delisting rule, the Final Revised Recovery Plan Supplement, and the Revised Conservation Strategy.	1006					Factor E	See Attached Attachments Carson Millie	FWS-R6-ES-2016-0042-2459	
The Yellowstone grizzly population is an island population, and with that comes inbreeding and the potential for devastating genetic effects, and greater susceptibility to disease!	1001					Factor E	See Attached Attachments Carson Millie	FWS-R6-ES-2016-0042-2459	
Going forward they will experience increased pressure on their habitat from globalization and climate change. They probably need increased protection as do their habitat.	1006					Factor E	Bears should not be removed from listing. Going forward they will experience increased pressure on their habitat from globalization and climate change. They probably need increased protection as do their habitat.	FWS-R6-ES-2016-0042-2526	

Many years ago, I too wanted to hunt and kill a grizzly bear. I thought that having a grizzly bear skin on my wall would be the neatest thing. I am glad now that I never got the chance. I am ashamed to now think of what I wanted to do. So I now ask that you put me on the list of people asking you to protect the grizzly. Do something right for a change and protect these animals that without our help cannot protect themselves. They stand no chance. Climate change and hunters will wipe them from the earth.	1006					Factor E	The government does not have the best record for protecting our wildlife and fish. Animals have gone to extinction because of the hands of man. Now we have the chance to keep that from happening to the Grizzly Bear. Are we going to help them in their need, or are we going to be stupid again and let these wonderful bears disappear like others and then regret the move. I am 75 years old and went to Yellowstone with my family in 1947. we saw many of the wonders of the park. The one thing I will go to my grave remembering is the day we saw a grizzly bear. So big and powerful. He walked like the king in his domain. I have never had the chance to again go to Yellowstone, but many young people will. Please do something right for a change and protect the grizzly bears. With your support all people will be able to see what I saw and it was wonderful. If people want to shot grizzlies, let them do it with a camera. The world is going to Hell in a hand basket. Lets not help by lifting the protection on the grizzly bear. This bear speaks to all generations through programs on TV. I know my family watches and we enjoy seeing one of GODs creatures living like it has for many hundreds of years. Look at what happened when we removed wolves from Yellowstone. Nature could not keep the balance of animals because they were gone. So it will be if grizzlies are hunted and not protected. Many years ago, I too wanted to hunt and kill a grizzly bear. I thought that having a grizzly bear skin on my wall would be the neatest thing. I am glad now that I never got the chance. I am ashamed to now think of what I wanted to do. So I now ask that you put me on the list of people asking you to protect the grizzly. Do something right for a change and protect these animals that without our help cannot protect themselves. They stand no chance. Climate change and hunters will wipe them from the earth. YOU ALL can play God in this matter. DON'T screw it up.	FWS-R6-ES-2016-0042-2555	
History has proven that hunters will again decimate the grizzly population to the point of extinction. If they are ever placed back under federal protection, it would take years to get that done legislatively - if at all. The breeding will be done with a smaller gene pool that will lead to more health issues for the bears.	1001					Factor E	The federal protection for grizzly bears should NOT be removed! History has proven that hunters will again decimate the grizzly population to the point of extinction. If they are ever placed back under federal protection, it would take years to get that done legislatively - if at all. The breeding will be done with a smaller gene pool that will lead to more health issues for the bears. It would also be more expensive in the long run to reintroduce bears to Yellowstone when the hunters kill most of the them with without federal protection.	FWS-R6-ES-2016-0042-2518	
Since the early to mid-2000s, two of the four key grizzly bear foods, cutthroat trout and the seeds of whitebark pine, have collapsed. Drought, climate warming and predation by a nonnative trout have nearly extirpated cutthroat trout in Yellowstone Lake. Whitebark pine have been functionally wiped out by the spread of a non-native fungal disease and by a highly lethal and unprecedented climate-driven outbreak of bark beetles.	1003	1002	1006			Factor E	I OPPOSE the delisting of the grizzly bears. "Why rush with a decision to delist, when all indicators are or a population that is vulnerable and positioned to decline even more than they already have?" - Dr. David Mattson Dr. Jane Goodall opposes delisting also. Yellowstone's grizzly bears have lost critically important foods. Since the early to mid-2000s, two of the four key grizzly bear foods, cutthroat trout and the seeds of whitebark pine, have collapsed. Drought, climate warming and predation by a nonnative trout have nearly extirpated cutthroat trout in Yellowstone Lake. Whitebark pine have been functionally wiped out by the spread of a non-native fungal disease and by a highly lethal and unprecedented climate-driven outbreak of bark beetles. Most elk populations have also declined some dramatically-- from highs reached during the 1990s and early 2000s. There is no doubt that food resources of Yellowstone's grizzly bears have declined and put the population at grave risk, with a prognosis of more of the same to come. State-level management of large carnivores is a problem. State wildlife management agencies in the West are locked down in an Iron Triangle that serves the minority special interests of those who want to kill deer, elk, moose, and bighorn sheep (i.e., ungulates). State agencies view large carnivores primarily as competitors for ungulates that could otherwise be on the market for sport hunting licenses, which are a major source of agency revenue. Sport hunting has been used during recent decades to drive down populations of mountain lions and wolves, and, accounts for roughly 70-80% of all deaths of adult carnivores in the region. Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals. Grizzly bears are vulnerable to the excesses of state-level wildlife management. Grizzly bears have one of the lowest reproductive rates of any terrestrial mammal. A typical female will only produce 2 cubs once every 3 years, with good odds that one of the cubs will die before it reaches adulthood. Grizzly bears also have difficulty colonizing new habitats, primarily because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates, and readily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. The US Fish & Wildlife Service cannot reliably assess the status of the Yellowstone population. Grizzly bears in Yellowstone's mountainous and forested wilderness are notoriously hard to count, whether live or dead. This means that the US Fish & Wildlife Service (USFWS) has resorted to using indirect indicators together with statistical adjustments to track the population. Recent research has shown that the methods used by the USFWS are not only unreliable, but also generate spurious results that increase the likelihood that the USFWS will erroneously conclude that the population has grown, when in fact, it has declined due to excessive numbers of deaths. ~~Given by the USFWS that the Yellowstone grizzly bear has grown to a substantial state for several decades are unsubstantiated.~~	FWS-R6-ES-2016-0042-2615	

Far better that we compensate ranchers for loss of livestock than subject the Grizzly to the type of "management" that will result in far fewer tourist dollars in the affected states and in the end reduce the number of wild Grizzlies back to an endangered level.	1009					Factor E	I do not believe the Grizzly bear should be removed from the Federal List of Endangered and Threatened Wildlife. This iconic bear creates millions of dollars of revenue for Wyoming, Montana and other states where tourists flock to see these remarkable animals in their natural habitat. These bears exist for the benefit of all Americans, not just those in the states where they reside. Removing them from Federal List and allowing them to be "managed" solely by individual states will surely result in significant reduction in numbers, through hunting or other "management" designed only for the benefit of a small segment of the state population - ranchers who utilize public lands for grazing. Far better that we compensate ranchers for loss of livestock than subject the Grizzly to the type of "management" that will result in far fewer tourist dollars in the affected states and in the end reduce the number of wild Grizzlies back to an endangered level.	FWS-R6-ES-2016-0042-2688	
The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems.	1001					Factor E	1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. Forest Service has not yet finalized its forest plan amendments. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Under the new Bush administration rules, forest plan standards will be discretionary, rather than mandatory. That means that the Forest Service will enforce the rules if it feels like it. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to DMS statements, only 15% of this land is protected as Wilderness, and the rest is open to	FWS-R6-ES-2016-0042-2754	
The grizzly bears in the Yellowstone area had been removed from the list in 2007 but in 2009 a 9th Circuit federal judge ordered that they be put back on, citing the decline of the whitebark pine tree, whose pine cone nuts were seen as a critical part of the grizzly diet. However, the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered. Fact: Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said the reason the population is leveling out is that bear density has reached the carrying capacity for the range. Fact: the number of female grizzlies with cubs in the Yellowstone ecosystem was the highest ever recorded ever counted in 2013.	1002					Factor E	According to Yellowstone National Park, over the last 40 years the grizzly population there has grown from 136 to a stable population of somewhere between 674 and 839 The recovery population goal was 500 and was actually met in 1999. The grizzly bears in the Yellowstone area had been removed from the list in 2007 but in 2009 a 9th Circuit federal judge ordered that they be put back on, citing the decline of the whitebark pine tree, whose pine cone nuts were seen as a critical part of the grizzly diet. However, the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered. Fact: Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said the reason the population is leveling out is that bear density has reached the carrying capacity for the range. Fact: the number of female grizzlies with cubs in the Yellowstone ecosystem was the highest ever recorded ever counted in 2013.	FWS-R6-ES-2016-0042-2745	

The plan to delist grizzlies is not ready for prime time. If the agency insists on pushing this, it needs to significantly revise the proposed rule to address climate change, human-caused mortality, habitat fragmentation and more. It needs to add buffer zones and put a moratorium on hunting in place.	1006						Factor E	Please reconsider the misguided and risky plan to delist Yellowstone area grizzly bears. Two out of three independent experts oppose removing grizzlies from the protections of the Endangered Species Act. These experts, instead, recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. According to these experts, of greatest concern to the populations' continued survival is habitat loss, habitat modification and human-caused grizzly mortality. Indeed, the Yellowstone ecosystem lost 59 bears just last year due to human conflict. This loss is not sustainable given the grizzlies' exceedingly low reproductive rate. Rather than delisting, the agency should be cautious and determine whether this loss is a continuing trend and, if so, what its impact will be on the species' survival. I agree with the majority of experts. The plan to delist grizzlies is not ready for prime time. If the agency insists on pushing this, it needs to significantly revise the proposed rule to address climate change, human-caused mortality, habitat fragmentation and more. It needs to add buffer zones and put a moratorium on hunting in place. Please listen to the experts - and not the local governors, livestock operations and hunters. Please keep grizzlies protected under the Endangered Species Act.	FWS-R6-ES-2016-0042-2791	
the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered.	1002						Factor E	According to Yellowstone National Park, over the last 40 years the grizzly population there has grown from 136 to a stable population of somewhere between 674 and 839 The recovery population goal was 500 and was actually met in 1999. However, the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered.. Yes, please do remove the grizzly bears from The List. Please let the States do the management. Thank you very much!!	FWS-R6-ES-2016-0042-2800	
There are more issues than a population count can address, such as the ever changing environmental factors, coupled with bears very slow reproductive rate(2nd slowest breeding animal in the continent) and fragility of health contributing to reproduction uncertainties.	1001						Factor E	Since Grizzly Bears took years of Endangered Species protections to come back from the brink of extinction in the lower 48 states, to where we might be able to see one once again in Yellowstone, it seems far too soon to delist at this time. There are more issues than a population count can address, such as the ever changing environmental factors, coupled with bears very slow reproductive rate(2nd slowest breeding animal in the continent) and fragility of health contributing to reproduction uncertainties. Occupation of less than 2% of historic habitat, with pockets of protections from trapping and hunting, will lead to isolated populations. It's well known that, one can only continue to breed relatives, of any species, for so long before genetic problems begin to arise and threaten any sustainable population. Currently we have a prime example of this problem displayed in the Isle Royale Wolves of Michigan. Isolated on an island and without any genetic biodiversity, they display genetic mutations and are dying out, at last report, there were two left. To not allow safe travel from one preserve to another, will effectively reduce the Greater Yellowstone Ecosystem population of Grizzly Bears to such a perilous position. It's already public knowledge that Wyoming, Montana and Idaho planned all along to sell hunting tags to the less than 4% of the population that trophy hunts, as soon as delisting occurs. It was the lack of care from Wyoming's Game & Fish, that led to the listing in the first place, since they couldn't manage to stop the hunting even when the population was crashing. Why would we expect them to do any different now? We have seen how they have been unable to develop a viable Wolf Management plan, which recently led to the return of the ESA status in the state, but only after a lawsuit was initiated by conservationists had been filed and heard in the courts. Both Grand Teton and Yellowstone National Park Superintendents have publicly stated they oppose the delisting of the Grizzly Bear and they based their position upon the best available science from the experts in the field of Grizzly Bear knowledge and physical area in question, the biologists of the Parks, the best bear experts in the world. We are certain that climate changes are occurring and that science is evolving daily. We know that currently we live in what is called, The 6th Major Extinction on Earth, losing more species in the last few years, than any there space in time since the dinosaurs died. We have also seen the Public Outrage over the trophy hunting of lions in Africa. The Yellowstone/Teton Grizzlies are just as famous, if not more so than Cecil the Lion. Ethically and morally it is wrong to kill any animal for a trophy. A 3 year study by USFWS, led by Chris Servheen, a known trophy hunter, affiliated with Safari Club International, is a biased and non-scientifically validated opinion, motivated by desire to hunt the bears. Never seen by the public, nor PEER reviewed by a panel of independent experts in the field, it is outrageously arrogant and shortsighted to accept any non-validated and transparent study. Amounting to nothing less than the Fox guarding the Hen House, this supposed study, would never make it to any Scientifically Valid Journals and probably the reason it's been hidden from anybody's view and evaluation. To think it's appropriate to take away the bear viewing opportunity of millions of people, coming from all over the world, to visit Yellowstone and Grand Teton	FWS-R6-ES-2016-0042-2819	

Occupation of less than 2% of historic habitat, with pockets of protections from trapping and hunting, will lead to isolated populations. It's well known that, one can only continue to breed relatives, of any species, for so long before genetic problems begin to arise and threaten any sustainable population. Currently we have a prime example of this problem displayed in the Isle Royale Wolves of Michigan. Isolated on an island and without any genetic biodiversity, they display genetic mutations and are dying out, at last report, there were two left. To not allow safe travel from one preserve to another, will effectively reduce the Greater Yellowstone Ecosystem population of Grizzly Bears to such a perilous position.	1001					Factor E	Since Grizzly Bears took years of Endangered Species protections to come back from the brink of extinction in the lower 48 states, to where we might be able to see one once again in Yellowstone, it seems far too soon to delist at this time. There are more issues than a population count can address, such as the ever changing environmental factors, coupled with bears very slow reproductive rate (2nd slowest breeding animal in the continent) and fragility of health contributing to reproduction uncertainties. Occupation of less than 2% of historic habitat, with pockets of protections from trapping and hunting, will lead to isolated populations. It's well known that, one can only continue to breed relatives, of any species, for so long before genetic problems begin to arise and threaten any sustainable population. Currently we have a prime example of this problem displayed in the Isle Royale Wolves of Michigan. Isolated on an island and without any genetic biodiversity, they display genetic mutations and are dying out, at last report, there were two left. To not allow safe travel from one preserve to another, will effectively reduce the Greater Yellowstone Ecosystem population of Grizzly Bears to such a perilous position. It's already public knowledge that Wyoming, Montana and Idaho planed all along to sell hunting tags to the less than 4% of the population that trophy hunts, as soon as delisting occurs. It was the lack of care from Wyoming's Game & Fish, that led to the listing in the first place, since they couldn't manage to stop the hunting even when the population was crashing. Why would we expect them to do any different now? We have seen how they have been unable to develop a viable Wolf Management plan, which recently led to the return of the ESA status in the state, but only after a lawsuit was initiated by conservationists had been filed and heard in the courts. Both Grand Teton and Yellowstone National Park Superintendents have publicly stated they oppose the delisting of the Grizzly Bear and they based their position upon the best available science from the experts in the field of Grizzly Bear knowledge and physical area in question, the biologists of the Parks, the best bear experts in the world. We are certain that climate changes are occurring and that science is evolving daily. We know that currently we live in what is called, The 6th Major Extinction on Earth, losing more species in the last few years, than any there space in time since the dinosaurs died. We have also seen the Public Outrage over the trophy hunting of lions in Africa. The Yellowstone/Teton Grizzlies are just as famous, if not more so than Cecil the Lion. Ethically and morally it is wrong to kill any animal for a trophy. A 3 year study by USFWS, led by Chris Servheen, a known trophy hunter, affiliated with Safari Club International, is a biased and non-scientifically validated opinion, motivated by desire to hunt the bears. Never seen by the public, nor PEER reviewed by a panel of independent experts in the field, it is outrageously arrogant and shortsighted to accept any non-validated and transparent study. Amounting to nothing less than the Fox guarding the Hen House, this supposed study, would never make it to any Scientifically Valid Journals and probably the reason it's been hidden from anybody's view and evaluation. To think it's appropriate to take away the bear viewing opportunity of millions of people, coming from all over the world, to visit Yellowstone and Grand Teton National Parks, only to state to the fact that less than 4% of us are trophy hunters, is to ignore the fact that there's a reasonable	FWS-R6-ES-2016-0042-2819	
The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. Å	1001					Factor E	I do not think grizzly bears should be de-listed as an ESA. There are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, digging for grubs and hunting prey. Seeing a grizzly bear in the wild is usually an experience that remains with you for life.	FWS-R6-ES-2016-0042-2883	
While their numbers have risen to more than 600 individuals, the bears are geographically isolated, and threats to their habitat and food supplies are daunting.	1001					Factor E	While their numbers have risen to more than 600 individuals, the bears are geographically isolated, and threats to their habitat and food supplies are daunting. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Removing protections always increases poaching and illegal means of luring animals to the margins of the protected areas for easy, senseless kills. Can't our nation leave the remaining wildlife unmolested, and for the public to enjoy, instead of encouraging blood sports, a relic of barbaric practices?	FWS-R6-ES-2016-0042-2901	

With only 700 Grizzlies remaining in the TGY ecosystem, it is most important the bears' numbers remain higher rather than lower to ensure genetic diversity among the remaining population. Additionally, their role in contributing to and balancing the biodiversity in the ecosystem is of paramount importance.	1001						Factor E	Please do NOT remove the Greater Yellowstone Ecosystem of Grizzly Bears from the Federal List of Endangered and threatened Wildlife. There are many reasons this is an unnecessary and risky proposition. With only 700 Grizzlies remaining in the TGY ecosystem, it is most important the bears' numbers remain higher rather than lower to ensure genetic diversity among the remaining population. Additionally, their role in contributing to and balancing the biodiversity in the ecosystem is of paramount importance. Finally, I believe it is inhumane and unethical to hunt wild animals for sport. The USFWS must work towards creating a new paradigm for wildlife management in the 21st Century that is focused on regenerative policies and practices for the natural world. Decreasing or merely sustaining the status quo is an unacceptable wildlife management policy. Thank you for your consideration.	FWS-R6-ES-2016-0042-2921	
Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated some of their food sources and they have to travel farther to find food.	1006	1000					Factor E	Do not delist the grizzly. Climate change will have a big impact. Some scientists think the planet will only last for another one hundred years. We are destroying the planet and everything on it. What is wrong with the human race that thinks they have to kill,kill, and kill more for fun and pleasure. This is a sickness. Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated some of their food sources and they have to travel farther to find food.	FWS-R6-ES-2016-0042-2968	
The still relatively small population remains subject to genetic difficulty and inbreeding is a serious threat to the genetic diversity of these animals.	1001						Factor E	There are many compelling reasons why removing ESA protections for Grizzly Bears is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty and inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling, and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. Please do not delist the Grizzly Bear! Thank you!	FWS-R6-ES-2016-0042-2951	

Their most important food source, nuts from the whitebark pine, is diminished by climate change. Bears' reproductive rates are slow. These bears are geographically isolated. This small population is subject to inbreeding, a serious threat to the genetic diversity of these animals.If Federal protections are lifted surrounding states will allow trophy hunting.	1002	1006	1001			Factor E	Please accept these comments regarding delisitng the Greater Yellowstone population of grizzly bears. Grizzly bears once roamed throughout the Western states. In the last 150 years human encroachment on their territory wiped out local populations, until they were isolated in a few ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the Greater Yellowstone population was estimated at 300 bears. Now there are 750 in the Greater Yellowstone ecosystem. Their most important food source, nuts from the whitebark pine, is diminished by climate change. Bears' reproductive rates are slow. These bears are geographically isolated. This small population is subject to inbreeding, a serious threat to the genetic diversity of these animals. If Federal protections are lifted surrounding states will allow trophy hunting. Recently it was revealed that the iconic bear, Scarface, was shot in Montana last fall. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to protect forests with large roadless tracts, and develop biological corridors between grizzly populations to ensure genetic diversity and the grizzly's long-term survival.	FWS-R6-ES-2016-0042-2978						
Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high-elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has.	1002	1003	1004	1005		Factor E	My comment is included in the uploaded file. Attachments 5-4-16GrizzCommentFinal	FWS-R6-ES-2016-0042-2973						
1. At present the Yellowstone area Grizzlies do NOT have a robust connection to any larger metapopulation in order to maintain or increase heterozygosity. This means that it is SURE that the small populatino will slowly trend to homozygosity - inbreeding vulnerabilities.	1001					Factor E	1. At present the Yellowstone area Grizzlies do NOT have a robust connection to any larger metapopulation in order to maintain or increase heterozygosity. This means that it is SURE that the small populatino will slowly trend to homozygosity - inbreeding vulnerabilities. 2. Wyoming and other states attempt consistently to use public sport hunting to manage wildlife - this practice does NOT affect any population in a naturally-selected manner, and due to the small population, increases the likelihood of removing the healthy members of any population. In the case of the grizzly bear, this practice would immediately cause the viable healthy component members to decrease in relation to the whole. NO state dshould be allowed to manage small predator populations, as the selection is artificial, not relating to heterozygosity, individual health, age, or any other parameter which nature normally selects - It is thus catastrophic in effect. The populatin, isolated aas it is, cannot sustain catastrophic human exploitation. Predators are not selected for human culling, attack, exploitation, and such activity would change the nature of the grizzly in ways most likely deleterious to the species and its trophic niche. 3. Wyoming has counties who already attempt to limit the species, by laws against grizzly in county, EVEN IF THAT AREA IS FEDERAL PUBLIC LAND. This decreases habitat and connectivity, and the act of delisting will cause a sudden change - a diminution - of viable habitat. the plan does NOT take this into account. 4. Yellowstone National Park where the grizzly was concentrated is high plateau, and is increasingly subject to biological effects of global warming - the longer nonfreezing days have caused a whitebark pine die-off, sending the grizzly already fromm the protected habitat outward to seek other forage. Thus the core population, relatively unknown due to the animal itself, has most likely fallen. The population estimates of Seervheen and others is almost certainly higher than actual numbers. Because of these issues, it will remain premature to delist the grizzly bear UNTIL robust habitat connectivity (with NO human take within those corridors) is created. The obama administration has consistently attempted to kill off large predators through political corruption in using political deals to get their party into office. The republican party corruptly attempts to delist endangered species for private and corporate exploitation. These are profoundly unethical reasons for present and past removals and attempts to remove large predators from ESL while they are still at numbers far lower than population modeling well-supported by experiment and consensus, suggest that a proper number of individuals preventing trend to homozygosity, are. Merely because a small group of consumptive wildlife killers desire to kill North American wildlife, is NOT a reason to rush delisting, before the population can clearly be understood to be self-sustaining over 40 or 100 more generations. The ONLY conditions under which delisting can ethically and ecologically be accepted is if NO public hunting, ever, is allowed of this species not adapted to humans with guns, fences, exclusionary rules of any sort - NO low population goals - the mandate of every state with wildlife - can be accepted, as this species has far too low a reproductive capacity. Grizzly bears must NOT be subjected to state regulation or state, county, or local law. Federal public lands must NOT be subject to such laws if						FWS-R6-ES-2016-0042-2990	

The Greater Yellowstone grizzly population is isolated from all other grizzly populations (pp. 13190-13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly population is seriously flawed and violates the requisite principle of "Best Science."	1001					Factor E	My comment is included in the uploaded file. Attachments 5-4-16GrizzCommentFinal	FWS-R6-ES-2016-0042-2973	
Yellowstone National Park where the grizzly was concentrated is high plateau, and is increasingly subject to biological effects of global warming - the longer nonfreezing days have caused a whitebark pine die-off, sending the grizzly already from the protected habitat outward to seek other forage. Thus the core population, relatively unknown due to the animal itself, has most likely fallen. The population estimates of Seervheen and others is almost certainly higher than actual numbers. Because of these issues, it will remain premature to delist the grizzly bear UNTIL robust habitat connectivity (with NO human take within those corridors) is created.	1006	1002	1001			Factor E	1. At present the Yellowstone area grizzlies do NOT have a robust connection to any larger metapopulation in order to maintain or increase heterozygosity. This means that it is SURE that the small population will slowly trend to homozygosity - inbreeding vulnerabilities. 2. Wyoming and other states attempt consistently to use public sport hunting to manage wildlife - this practice does NOT affect any population in a naturally-selected manner, and due to the small population, increases the likelihood of removing the healthy members of any population. In the case of the grizzly bear, this practice would immediately cause the viable healthy component members to decrease in relation to the whole. NO state should be allowed to manage small predator populations, as the selection is artificial, not relating to heterozygosity, individual health, age, or any other parameter which nature normally selects - it is thus catastrophic in effect. The population, isolated as it is, cannot sustain catastrophic human exploitation. Predators are not selected for human culling, attack, exploitation, and such activity would change the nature of the grizzly in ways most likely deleterious to the species and its trophic niche. 3. Wyoming has counties who already attempt to limit the species, by laws against grizzly in county, EVEN IF THAT AREA IS FEDERAL PUBLIC LAND. This decreases habitat and connectivity, and the act of delisting will cause a sudden change - a diminution - of viable habitat. the plan does NOT take this into account. 4. Yellowstone National Park where the grizzly was concentrated is high plateau, and is increasingly subject to biological effects of global warming - the longer nonfreezing days have caused a whitebark pine die-off, sending the grizzly already from the protected habitat outward to seek other forage. Thus the core population, relatively unknown due to the animal itself, has most likely fallen. The population estimates of Seervheen and others is almost certainly higher than actual numbers. Because of these issues, it will remain premature to delist the grizzly bear UNTIL robust habitat connectivity (with NO human take within those corridors) is created. The Obama administration has consistently attempted to kill off large predators through political corruption in using political deals to get their party into office. The republican party corruptly attempts to delist endangered species for private and corporate exploitation. These are profoundly unethical reasons for present and past removals and attempts to remove large predators from ESL while they are still at numbers far lower than population modeling well-supported by experiment and consensus, suggest that a proper number of individuals preventing trend to homozygosity, are. Merely because a small group of consumptive wildlife killers desire to kill North American wildlife, is NOT a reason to rush delisting, before the population can clearly be understood to be self-sustaining over 40 or 100 more generations. The ONLY conditions under which delisting can ethically and ecologically be accepted is if NO public hunting, ever, is allowed of this species not adapted to humans with guns, fences, exclusionary rules of any sort - NO low population goals - the mandate of every state with wildlife - can be accepted, as this species has far too low a reproductive capacity. Grizzly bears must NOT be subjected to state regulation or state, county, or local law. Federal public lands must NOT be subject to such laws if predators like grizzly bears are delisted. I have been a repeated visitor to Yellowstone, the only national park in the lower 48, where	FWS-R6-ES-2016-0042-2990	
While bears in Yellowstone feed on elk, bison and fish, x their most essential food source is seeds and nuts from the whitebark Å pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally Å imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the Å process. Both of these threats x increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone Å would wipe out the fungus and beetle infestations.	1006	1005	1002			Factor E	While bears in Yellowstone feed on elk, bison and fish, their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. This is not the time to be delisting the Greater Yellowstone ecosystem population of grizzly bears from the Federal list of Endangered and Threatened wildlife.	FWS-R6-ES-2016-0042-3013	

Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source.	1001	1002					Factor E	I oppose delisting and here is some science based facts. Following is a statement from Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. "Given all of the uncertainty facing the Yellowstone grizzly, we do not think it is time to declare victory for these bears just yet. Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source. "The Endangered Species Act has been tremendously successful at saving this population and preventing its demise. And retaining those valuable protections until the Yellowstone grizzly population is more robust and its future more certain is the best way to turn that past success into true recovery."	FWS-R6-ES-2016-0042-3119	
The decline of the white bark pine since 1998 and it's historic role as as important food source for grizzlies has been grossly minimized. That the tree has been a critical food source for bears has been well documented in Dr. jonkel's research.		1002					Factor E	How can a truly informed decision on delisting grizzlies be made when we don't even know what the state management plans for Montana and Idaho are yet that would take the place of current guidelines? We need to know the plans and have a comment period afterward in order to know how to proceed. A lot of the sound science that has been Chuck Jonkel's life work is being ignored. Stark changes since the 1998 baseline data have not been taken into consideration. Climate change and the resulting food types and supply changes have not been factored into the consideration to delist. The decline of the white bark pine since 1998 and it's historic role as as important food source for grizzlies has been grossly minimized. That the tree has been a critical food source for bears has been well documented in Dr. jonkel's research. In short, the grizzly needs more time to determine if it can indeed cope with it's fastly changing environment.	FWS-R6-ES-2016-0042-5410	
Stable and healthy populations are determined by genetic diversity, the proportion of females of reproductive age, population trends, and the quality of habitat. However, in the last decade, the GYE has essentially lost all its whitebark pine to the combination of the non-native blister rust and enormous outbreaks of mountain pine beetle, both exacerbated by climate change. Meanwhile, droughts and competition from non-native lake trout have extirpated westslope cutthroat trout from Yellowstone Lake. While many bear populations may adapt to climate change fairly easily, the GYE grizzlies are losing so many crucial food resources at the same time.	1001	1002	1006	1003			Factor E	I oppose the delisting of the Greater Yellowstone Ecosystem grizzly bear population at this time. While the population has increased since it was listed as threatened under the Endangered Species Act, simply the number of bears in a population alone does not necessarily indicate a stable or healthy population. Stable and healthy populations are determined by genetic diversity, the proportion of females of reproductive age, population trends, and the quality of habitat. However, in the last decade, the GYE has essentially lost all its whitebark pine to the combination of the non-native blister rust and enormous outbreaks of mountain pine beetle, both exacerbated by climate change. Meanwhile, droughts and competition from non-native lake trout have extirpated westslope cutthroat trout from Yellowstone Lake. While many bear populations may adapt to climate change fairly easily, the GYE grizzlies are losing so many crucial food resources at the same time. Grizzlies are among the slowest reproducing land mammals in North America, and it can take a long time for declining populations to recover, especially with decreasing food resources. Due to declines in key food sources and with loss and degradation of available habitat, I oppose the removal of the GYE grizzly population from the list of threatened species at this time. While the current delisting proposal does address declines in whitebark pine, it fails to consider the significance of the whitebark pine nut to the GYE grizzly bear population.. Whitebark pine nuts are a high protein food source that once was abundant in the GYE and offered a concentrated food source requiring low caloric output. While bears are amazingly adaptable omnivores, they depend on abundant food resources to sustain them through both the months when they are active and through winter hibernation. There is no readily available alternative equivalent to the whitebark pine nut in the GYE. At the same time, grizzly habitat is being converted to residential subdivisions, ranches, and resorts, and as grizzlies set out to explore food resources in other areas, they meet up more and more with humans, often to their own demise. Army cutworm moths, another key food source that could potentially serve as an alternative lives high in the alpine, and their populations are vulnerable to climate change and exposure to pesticides. I applaud the conservation and management efforts that are successfully moving the Greater Yellowstone grizzly population toward recovery, but delisting the population at this time is premature. Attachments Comment GYE Grizzly	FWS-R6-ES-2016-0042-5415	

The Yellowstone grizzlies have not had a long enough recovery period to expand out their population into neighboring areas to allow for diversification and the strengthening of their gene pool. They are still in small and isolated numbers.	1001						Factor E	The Yellowstone grizzlies have not had a long enough recovery period to expand out their population into neighboring areas to allow for diversification and the strengthening of their gene pool. They are still in small and isolated numbers. Also, they are an apex predator of the Yellowstone ecosystem. They are necessary for a continued healthy ecosystem there, and in other states. The grizzly bears are truly iconic to Yellowstone and to a number of other northern states. Tourists bring great and needed revenue to states in which grizzlies, wolves and bison exist. Tourists from other countries also want to come to Yellowstone and other northern states to see these popular and magnificent icons of America! Please use scientific information and evidence in this very highly important decision and not listen to the greed of those who do not consider the importance or even the lives of these great animals! These animals and all species are critically important to Yellowstone and to our nation! They were not put on the earth to become someone's rug or trophy! They exist to perform their purpose of existence. Thank you for your informed and concerned determination of this highly important decision.	FWS-R6-ES-2016-0042-3194	
Groups including the Sierra Club, Defenders of Wildlife, the Humane Society, the Center for Biological Diversity and the Natural Resource Defense Council all released statements saying the delisting was "premature". They argue that the Yellowstone bear population isn't that stable. In specific they stated: "The Yellowstone grizzly bear population is isolated from other populations of bears. They've also been experiencing high levels of conflicts this year with people," said Sylvia Fallon with the National Resources Defense Council. "And their population has not grown and is likely declining. That's following the loss of white bark pine, which is a critically important food source for them." The conservation groups are urging the U.S. Fish and Wildlife Service to undertake more research instead of removing protection for the Yellowstone grizzlies.	1001	1002					Factor E	USFWS, please listen to the environmental groups that oppose the proposal to take the Yellowstone Grizzlies off the Endangered Species List. Groups including the Sierra Club, Defenders of Wildlife, the Humane Society, the Center for Biological Diversity and the Natural Resource Defense Council all released statements saying the delisting was "premature". They argue that the Yellowstone bear population isn't that stable. In specific they stated: "The Yellowstone grizzly bear population is isolated from other populations of bears. They've also been experiencing high levels of conflicts this year with people," said Sylvia Fallon with the National Resources Defense Council. "And their population has not grown and is likely declining. That's following the loss of white bark pine, which is a critically important food source for them." The conservation groups are urging the U.S. Fish and Wildlife Service to undertake more research instead of removing protection for the Yellowstone grizzlies. USFWS, please follow their recommendation and refrain from delisting the Yellowstone Grizzlies.	FWS-R6-ES-2016-0042-3251	
Climate change also poses an additional threat to grizzly bears within the Greater Yellowstone Ecosystem.	1006						Factor E	I am adamantly opposed to the delisting of the grizzly bear. It is clear that the threats that caused the grizzly bear to become endangered still exist today. The states have shown they can not manage grizzly bears responsibly with trophy hunts already planned in anticipation of delisting. Climate change also poses an additional threat to grizzly bears within the Greater Yellowstone Ecosystem.	FWS-R6-ES-2016-0042-3246	

Yellowstone grizzly bears are not recovered and continue to be imperiled by resource declines such as habitat and dietary losses. Today, wild grizzly bears number fewer than 1,700 individuals in the lower 48 states. Grizzly bears have not recovered across a significant portion of their range, and thus they are not recovered and should not be delisted. Hunting grizzly bears would further jeopardize their persistence.						Factor E	Please see the attached comment letter. I urge FWS not to remove grizzly bears from protections under the ESA, and I strongly oppose trophy-hunting of grizzly bears. Attachments Oppose grizzly delisting_comment letter_May 2016	FWS-R6-ES-2016-0042-3274	
Grizzly bears face multiple threats to persistence including the loss of their primary food resources. Currently, whitebark pine seeds, native cutthroat trout, huckleberries, army cutworm moths, elk and bison are either declining and/or are expected to decline in the foreseeable future as a result of habitat loss, climate change, drought, invasive species and other anthropogenic causes. Traditionally, whitebark pine seeds have provided a core dietary staple for grizzly bears. Yet, the whitebark pine, a species the FWS agrees warrants federal protection, is in decline because of a variety of problems. Another key source of sustenance, the cutthroat trout, has stopped spawning in all tributaries of Yellowstone Lake. Army cutworm moths, a staple for grizzly bears since the late 1990s, could likely disappear because they nectar on tundra flowers, which are highly vulnerable to global warming. Berries have become largely unavailable to grizzly bears due to warming summer temperatures and drought severity since at least 2005. These food failures of whitebark pine, cutthroat trout, huckleberries have caused grizzly bears to switch to a more meat-based diet, including domestic livestock.	1002	1003	1004	1005	1006	Factor E	Please see the attached comment letter. I urge FWS not to remove grizzly bears from protections under the ESA, and I strongly oppose trophy-hunting of grizzly bears. Attachments Oppose grizzly delisting_comment letter_May 2016	FWS-R6-ES-2016-0042-3274	
USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears.	1006					Factor E	DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears. - GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, it is particularly vulnerable to excessive killing by humans. Last year, saw 59 grizzlies killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow reproducing species. - NEARLY 50 TRIBES OPPOSE DELISTING OF GRIZZLIES. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly oppose delisting and hunting of these bears, which they consider to be sacred animals. - EXPERTS OPPOSE REMOVING GRIZZLIES FROM THE ENDANGERED SPECIES LIST. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted. Based on what I've learned, the PEOPLE don't want this...so why are you working against the same people who put you in office. People who keep you employed. If the American population doesn't want this and experts are saying we shouldn't do it, then why are you? That's the question you need to ask yourself. Are you being fueled by money, unethical money, lack of morals? I think you need to get your ego checked. Stop thinking mankind is above animals because we are not. All Lives Matter. Anything that breaths feels and knows what is happening. Plus bears are very docile - they don't attack people, so why are YOU scared of them? What are YOU scared of that makes you want to delist them?	FWS-R6-ES-2016-0042-3247	

These food failuresâ€whitebark pine, cutthroat trout, huckleberriesâ€have caused grizzly bears to switch to a more meat-based diet, including domestic livestock. In addition, Yellowstoneâ€™s Jackson and Northern Range elk herds and its Central Range bison herd are all in decline. As a result, bears have been in conflict with humans, leading to record numbers of lethal actions taken against them.	1002	1003	1005			Factor E	Please see the attached comment letter. I urge FWS not to remove grizzly bears from protections under the ESA, and I strongly oppose trophy-hunting of grizzly bears. Attachments Oppose grizzly delisting_comment letter_May 2016	FWS-R6-ES-2016-0042-3274	
biologists have noted that grizzly bear cub production has declined, perhaps because of more predation on cubs by wolves and other bears as a result of their new dependence upon a meat-based diet, which puts them into greater proximity with other predators, resulting in deadly strife on grizzly bear cubs. The loss of flora and fauna upon which grizzly bears depend in Yellowstone and Grand Teton national parks, in part, explains why grizzly bears are dispersing in greater numbers from park lands to national forests lands, which are grazed by public lands permittees, to search for food.	1005					Factor E	Please see the attached comment letter. I urge FWS not to remove grizzly bears from protections under the ESA, and I strongly oppose trophy-hunting of grizzly bears. Attachments Oppose grizzly delisting_comment letter_May 2016	FWS-R6-ES-2016-0042-3274	
The Behavior and Life History section of the proposal states that large home ranges of males promotes genetic diversity, but this proposal subjects these bears to hunting pressures and to severe limitations on expansion of range -- thereby reducing genetic diversity. This section also states that the build up of fat stores is critical for survival during hibernation. You fail to address how bears, pursued by legions of trophy hunters and (very likely) packs of hounds, will be able to build up those essential fat stores.	1001					Factor E	To say that a species is recovered at 674 individuals, occupying 2% or less of original range, is as insipid as saying the species should be restored to its original population of 50,000-100,000. In terms of peer review of scientific data and interpretations, you fail to identify timetable, who the experts are, who chose them, and what criteria were used. Why? The Behavior and Life History section of the proposal states that large home ranges of males promotes genetic diversity, but this proposal subjects these bears to hunting pressures and to severe limitations on expansion of range -- thereby reducing genetic diversity. This section also states that the build up of fat stores is critical for survival during hibernation. You fail to address how bears, pursued by legions of trophy hunters and (very likely) packs of hounds, will be able to build up those essential fat stores. You state repeatedly in the proposal that the objective is to reduce or mitigate the risk of human-caused mortality. Idaho has lax regulations. Poaching fines have been stagnant since 1999, and a proposal to raise them died in committee this year. An April 26, 2016 letter from Idaho Rep. Simpson advises me of "expanding populations of gray wolves and grizzly bears" and what a fine job Idaho Wildlife Services does in conducting predator control. He also advises of the threats that beavers pose. Idaho is a wildlife-hostile state from the governor on down. Online comments from hunters on proposed hunting regulations (bear baiting, for example) taunt IDFG about their lack of enforcement and lack of personnel in the field and the hunters' pledges to continue doing whatever they like given the miniscule chance of getting caught. Your trust in Idaho's ability to "manage" grizzlies and run education campaigns is misplaced and ridiculous. Look at the relentless persecution of wolves -- including year-round trapping on private lands. You say in this proposal that you do not anticipate states establishing trapping seasons for grizzlies, but the newest Commission member vows to expand trapping opportunities in Idaho. IDFG has not released its grizzly management plan yet, according to an IDFG staffer's statement to me yesterday, but it should be available in "the next few weeks." Why ask the public to comment before the state plans are available? One of the reasons cited for delisting wolves and allowing hunting and trapping was to build tolerance in local communities. It did the opposite in Idaho and simply fueled a rage and resentment towards the species that is still growing. Delisting is extremely bad news for Idaho bears. Let me point out that hunting does not contribute to "secure habitat," which you say is a critical management component to ensure species persistence. Your suggestion that there are "reasonable and manageable levels" of grizzly mortality is offensive and insulting. Recreational killers and outfitters are a small percentage of the American population. Do not assume that the majority supports the goal to have enough animals for recreational killing. You might have learned something from the Cecil the lion debacle. Most of us oppose trophy hunting and recreational killing. I vehemently disagree that any human-caused mortality of cubs and their mother is acceptable. Zero is acceptable. You fail to demonstrate how you will prevent hunters from killing mother bears & their young. I am outraged by your allowable mortality percentages for males, females, and cubs. I get the impression that this proposal was written for the sole benefit of recreational killers. This proposal states that bears cannot exist where and not where all hunters are	FWS-R6-ES-2016-0042-S430	

By continuing the protection, the grizzly gene pool will be maintained or improved. Furthermore, as they continue to expand their home ranges, their natural migration into the Bitterroot Mountains and Northern Continental Divide would be enhanced, instead of the continual isolation of the GYE.	1001					Factor E	The IGBC has worked tirelessly for the recovery of grizzlies for many years and their population has increased a modest amount since 1975 when they were initially listed and I commend their efforts. I ask the question, what is the purpose and need to delist the GYE grizzly. I worked for the BLM my entire career and I know the pressure to delist species so management activities can go forward. I know the states have put pressure to allow their agencies to take over management, but let's let science decide and leave the politics to the politicians. Here is the need to continue the protection of GYE grizzly bears: 1. Grizzlies reproduce at one of the slowest pace of any large mammal in the US, so any loss of adult females would significantly adversely affect their overall population. 2. Even though grizzlies eat a wide variety of foods, the majority rely on whitebark pine seeds while others rely on Yellowstone cutthroat trout which have both significantly declined in recent years. These losses result in grizzlies looking for alternate high protein and fat food sources which may be one of the reasons why human caused grizzly deaths are on the increase. 3. Visitors to Yellowstone and Grand Teton National Parks provide hundreds of millions of dollars to the local economy and one of the main reasons for their visitation is to see live grizzly bears. I realize the ESAs purpose is not to provide economic stimulus, however, there is little doubt if grizzly bear hunts are allowed, less opportunity for bear observations will occur. 4. By continuing the protection, the grizzly gene pool will be maintained or improved. Furthermore, as they continue to expand their home ranges, their natural migration into the Bitterroot Mountains and Northern Continental Divide would be enhanced, instead of the continual isolation of the GYE. 5. Conflicts between grizzlies and humans are mainly due to livestock predation and hunter encounters. Their continued protection would put the onus on us, requiring us to learn how to live with them instead of them bearing our faults. There are ranchers living among grizzlies that have had few or no conflicts with bears for years because they have learned how to alter their practices. We know how to reduce human/grizzly conflicts, but if delisted, the indiscriminate killing (eventual hunting) would do little to reduce these conflicts. Grizzlies have two main needs, to eat and breed. Their main food sources before winter fat up are significantly declining and any loss of adult bears and especially breeding females would adversely affect their population and continued recovery. One of the greatest moments of my life occurred while hiking in Glacier NP and had a close encounter with a grizzly. Their presence on the wild landscape is an indicator of a fully functioning ecosystem and until they disperse to other recovery zones, there is no need to delist them.	FWS-R6-ES-2016-0042-3293	
Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, & meat from various sources. 2 of these foods have been dramatically reduced in recent years; whitebark pine seeds & cutthroat trout. The 1988 fires, an introduced fungal pathogen & an unprecedented bark beetle outbreak to the whitebark which together with up to 90% loss of spawning cutthroat trout due to the introduction of Lake trout into Yellowstone Lake have impacted on food supply for the grizzlies. Cutworm moths are an unreliable source as they migrate into high elevation slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. Meat as the only remaining high-quality food resource. The Rule is based on assumption for which there is no evidence base, that as grizzlies are generalists with a broad range in diet, a loss of critical food resources has minimal negative impact. The current sources of replaced food assumed are poor quality, do not equate to replacement, and will negatively impact the carrying capacity of Yellowstone. There is no evidence to suggest otherwise.	1002	1003	1004			Factor E	Please see below Attachments 160507 Grizzly bears	FWS-R6-ES-2016-0042-3400	
FWS has exclusive monopoly on raw data on YGB, data that is owned by taxpayers that FWS refuses to release. Without free and unhindered access to data how can the public possibly trust FWS with our bears? In its haste to delist FWS conspicuous omissions look to be for the sole purpose of supporting its agenda to give bear management to the states where a trophy hunt aka discretionary mortality is already for sale. \$150 per head is Americas return on investment. FWS is entirely overly optimistic when monopolizing the publics data by making unproven assertions of secure environment for YGB while dismissing impact of highly dynamic factors ie Anthropogenic Climate Change (ACC) therefore we conclude that the effects of climate change do not constitute a threat to the GYE Grizzly Bear now, nor is it anticipated to in the future. Declaring that ACC effects may even make habitat more suitable and food sources more abundant (Servey 2010 p4) so FWS is endorsing ACC now, great just what we need more catastrophic ACC for YGB even as ample evidence of ACC is sighted in the Rule (13216-13217). Schizophrenic, FWS still says no problem YGB are adaptable yet with no supporting evidence provided. YGB requires seasonally reliable highly nutritional foods to sustain itself which FWS does not identify. The YGB is evolutionarily unique and isolated pop with distinct ancient ties to a Yellowstone now in the midst of deteriorating environmental conditions from ACC, excessive unsustainable human caused mortality, declining foods evidenced in terminal White Bark Pine seed, fragmented pops from impaired habitat, long term deleterious trends to carrying capacity and victims of FWS overestimates that contain no scientific accountability, inaccurate misleading pop estimates, no connectivity to NCDE effecting long term genetic viability species. Pop dynamics is a body of solidly grounded dynamical systems theory with governing principles of best science which FWS dismisses out of hand. FWS says pop numbers are high enough to delist w/o citing pop critical aspects pertinent to delisting ie reproductive delays eroding YGB pop dynamics. Pop growth= Births--Deaths. Very damaging pared with loss of critical foods=sudden and dramatic collapse. This is particularly true since the ingredients for complex dynamics are so prevalent and obvious in YGB. If FWS wants publicity for its delisting proposal well they're certainly going to get it. FWS has no science based conclusions instead its conclusions are backwards march away from ACC & White Bark Pine Seed (WBPS). How could FWS confuse WBP trees with WBP seeds in the Rule? YGB does not eat trees they eat seeds! This was the YGB most sustainable nutritional food that is now endangered itself if not terminal. FWS has completely bungled then conflated data so horribly then proceeds to cover their tracks by scapegoating the YGB because of their single minded and unforgivable deadly mistakes. The case of the catastrophic carrying capacity loss here in Idaho since the 1990s erodes the chances of YGB in						Factor E	See attached file(s) Attachments Comment on Grizzly Bear Delisting 5.10.16	FWS-R6-ES-2016-0042-3434	

it is difficult to deny the adverse impacts climate change and other causes is having on critical food sources.	1000	1006				Factor E	I am opposed to delisting grizzly bears in the Yellowstone Grand Teton Ecosystem (YGTE) at this time and providing my comments below as well as questions regarding the delisting proposal. There is no compelling reason for delisting and reducing the number of grizzly bears when the relatively small isolated and genetically impaired population in the YGTE is dependent on many rapidly changing variables. The trend is not favorable for a healthy grizzly population with the adverse impacts of shrinking habitat due to human encroachment and the annual toll of human caused deaths. In addition it is difficult to deny the adverse impacts climate change and other causes is having on critical food sources. There is little consensus on the actual population of grizzlies in the YGTE, but what is known is that only about 25% of the population is composed of breeding females, perhaps as few as 150. With low reproduction rates, female bears are critically important in maintaining the population. How can anyone predict a robust future for a recovering species when there are so many variables and so many unknowns? How will delisting followed by hunting as Wyoming is planning, improve the long term survival of this iconic animal? How will killing members of a recovering species improve the genetics and predictability of the population dynamics? Clearly delisting means hunting as the plans are already in motion in Wyoming. And just as clearly, with the popularity of female bear number 399 and her importance to the tourism industry, she will be high on the list for trophy hunters. Several guides and individuals who want a bear skin rug and her stuffed head gathering dust in their den have made it clear that she is a prime target. Why put her life at risk when she has a huge fan base around the world? Since 399's habits are well documented, her den site is known, she is accustomed to seeing humans watching her, and she has a tracking collar - she is a dead duck. The USFWS knows that as well as everyone else. Without question she will be one of the first to go. There are other bears whose habits are well known. They are not causing problems but they along with 399 will be killed. Killing of these bears cannot be classified as hunting as there is no hunting required, it is just killing without any purpose other than to deprive others of seeing beautiful bears like 399 in the wild. And what happens if she or other bears are wounded in the killing free for all? Not one person will go hungry if these bears are not killed, however the world will be a much poorer place. This is a tragedy that does not have to happen. It is well known that the YGTE is an island with little connectivity to the rest of North America. The result is a genetic bottleneck and a current and long term threat to the health of the grizzly population. How will allowing the random killing of grizzlies with no concern for the lost genetics or even the sex of the bears, improve the gene pool in the YGTE? How will creating a mote around the YGTE by hunting at the boundaries improve the much needed genetic connectivity with bears outside the YGTE? Ensuring bears remain isolated will only further impair much needed connectivity. If America is to have a healthy and genetically robust grizzly population the grizzly must be protected in all areas designated as suitable grizzly bear habitat within and surrounding the YGTE, the Upper Green River Valley and the Wind River range. These are areas that are very important in ensuring critical long term population and distribution objectives are achieved. The Upper Green River area is so important habitat linking the bears	FWS-R6-ES-2016-0042-3473	
â€œGenetic viability The Greater Yellowstone grizzly population is independent from all other grizzly populations & increased inbreeding will likely negatively impact on genetic viability. The Rule is based on flawed research which assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in an unviable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly population is seriously flawed & not in keeping with the requisite principle of rigorous evidence-based decisions.	1001					Factor E	Please see below Attachments 160507 Grizzly bears	FWS-R6-ES-2016-0042-3400	
â€œClimate Change Impacts The unsubstantiated statement, "Most grizzly bear biologists in the United States & Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears" has been inappropriately applied to dismiss the negative impact of climate change on population and viability. This is somewhat contrary given the publication authored by Dr. Servheen, presents considerable evidence (pp. 13216 - 13217) that climate change has already detrimentally affected Yellowstone's grizzly population. Further, unsubstantiated & somewhat biased statements such, 'grizzly bears are adaptable, they'll do just fine,' provide no evidence to base an appropriate decision.	1006					Factor E	Please see below Attachments 160507 Grizzly bears	FWS-R6-ES-2016-0042-3400	

FWS claims there is a large and healthy population of bears but scientists and even the former NPS superintendent of Yellowstone have questioned the studies numbers and methodology. FWS is also claiming bears are not suffering adversely from the loss of 2 major food sources, the cutthroat trout and whitebark pine. It is too early to be sure what long term affect this will have on the bears but 2015 was a record year for Grizzlies killed around Yellowstone and as bears are forced out of the national park in search of food they will be left vulnerable to being shot without protections imparted by the endangered species act. Delisting the grizzly bears could result in decades of recovery work being lost in a few short years under state management which will allow trophy hunting, according to a memo between the states widely circulated in the media.	1002	1003					Factor E	I am opposed to the delisting of the Yellowstone grizzly bear. As a long time resident and guide in Yellowstone National Park I have serious concerns about the future of the grizzly bear and the sustainability of their population. FWS claims there is a large and healthy population of bears but scientists and even the former NPS superintendent of Yellowstone have questioned the studies numbers and methodology. FWS is also claiming bears are not suffering adversely from the loss of 2 major food sources, the cutthroat trout and whitebark pine. It is too early to be sure what long term affect this will have on the bears but 2015 was a record year for Grizzlies killed around Yellowstone and as bears are forced out of the national park in search of food they will be left vulnerable to being shot without protections imparted by the endangered species act. Delisting the grizzly bears could result in decades of recovery work being lost in a few short years under state management which will allow trophy hunting, according to a memo between the states widely circulated in the media. As a guide in Yellowstone park, I rely on wildlife being visible for my clients. Delisting the grizzly is bad for bears, bad for business and wrong for Yellowstone.	FWS-R6-ES-2016-0042-3544	
Trophy hunting is indiscriminate and unnecessary. Between climate concerns and wasteful hunting, the species could easily be returned to the brink of extinction.	1006						Factor E	I am not in favor of removing the Greater Yellowstone population of Grizzlies from the endangered and threatened list. We do not know what impact global warming will have on this limited species in the future. Trophy hunting is indiscriminate and unnecessary. Between climate concerns and wasteful hunting, the species could easily be returned to the brink of extinction. We need to preserve our wildlife for future generations.	FWS-R6-ES-2016-0042-3555	
I believe any change to the grizzly bear status is premature. Currently their habitat is changing, apparently from the direct and indirect impacts of a changing climate. No matter the other influences on making a decision, prudence dictates awaiting more information on the emerging bear-ecosystem relationship. One not-very-unlikely risk is that the combination of delisting and ecosystem changes will lead to a crisis that is recognized only after-the-fact. If that crisis is followed by a delayed response, the likely result would be a grave decrease in population diversity.	1006						Factor E	I believe any change to the grizzly bear status is premature. Currently their habitat is changing, apparently from the direct and indirect impacts of a changing climate. No matter the other influences on making a decision, prudence dictates awaiting more information on the emerging bear-ecosystem relationship. One not-very-unlikely risk is that the combination of delisting and ecosystem changes will lead to a crisis that is recognized only after-the-fact. If that crisis is followed by a delayed response, the likely result would be a grave decrease in population diversity.	FWS-R6-ES-2016-0042-3590	

Grizzlies have not rebounded in their historical range throughout the western US and have a limited gene pool in Yellowstone, making their current numbers fragile and susceptible to future growth. Additionally, their major food source of seeds and nuts from the whitebark pine is under siege from the fungus that has been decimating that the species, making it harder for the bears to survive through other food sources.	1001	1002					Factor E	I'm writing to show my disapproval of this proposal, the grizzly bear should not be removed from the federal list of endangered and threatened wildlife. Grizzlies have not rebounded in their historical range throughout the western US and have a limited gene pool in Yellowstone, making their current numbers fragile and susceptible to future growth. Additionally, their major food source of seeds and nuts from the whitebark pine is under siege from the fungus that has been decimating that the species, making it harder for the bears to survive through other food sources. Human encroachment on the grizzly habitat also makes its potential habitat less available and likely in the future. Wyoming for instance, has counties that have passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without federal ESA protections, these Bears will be killed without hesitation. Please keep these reasons and other scientific evidence in mind when making your decision. Keep the grizzly bear on the federal endangered species list!	FWS-R6-ES-2016-0042-3597	
Currently the whitebark pine in the GYA area which is a main food source for the bears has been greatly reduced due to the mountain pine beetle. With the effects of climate change, further food sources and habitat areas for the grizzlies may be diminished in the future.	1002	1006					Factor E	I am asking you to reconsider your proposal about removing the Greater Yellowstone Area (GYA) population of grizzly bears from the List of Endangered and Threatened Wildlife. Even though the GYA bear population as grown to an estimated 700 animals, with some estimates giving higher number, I believe this number may not be high enough to consider reducing the population through hunting. Currently the whitebark pine in the GYA area which is a main food source for the bears has been greatly reduced due to the mountain pine beetle. With the effects of climate change, further food sources and habitat areas for the grizzlies may be diminished in the future. Genetic diversity in the GYA grizzly population may also be significantly affected if the population is allowed to be reduced to 500 animals. A FWS talking points paper on this issue states that if the population falls below 500, the Montana FWP would transplant bears from other areas to maintain genetic diversity. Why not let the GYA grizzly population grow to a point where the genetic diversity is robust enough, then reconsider the delisting options. One study states that it may take a population of 1850 animals to maintain adequate genetic diversity. Please understand that I am not opposed to hunting, and have hunted big game wildlife in the past. However I see no practical need to hunt grizzly bears. This is trophy hunting only, nothing more, nothing less. Even though the USFWS has approved management plans from the states of Montana, Wyoming, and Idaho, what assurances are there that any or all of these states won't make changes to these plans that would have considerable negative impacts on the grizzly population. There is also no need for depredation hunts, as to my knowledge there is no significant grizzly activity that is causing widespread damage to human or domestic livestock. The growing robust grizzly population is a good thing, and the USFWS should be commended for taking the steps that have allowed this to happen. With this growth comes the inevitable increase of human/grizzly encounters. With more people than ever visiting the Yellowstone area and more bears, this is a predictable situation. However much of the responsibility for these encounters has to be placed on humans. We are visiting the bears habitat, and need to learn to respect that. If humans go out and do stupid things like approach bison or enter bear habitat areas without taking the necessary precautions, it should not be the animals who are blamed and hunted. Finally, it is ironic to me that on the USFWS home web page the winning poster for the 2016 Saving Endangered Species Youth Art Contest. It's hard to miss the grizzly right in the middle of the poster. It would be a shame if the GYA grizzly population is placed right back on the Threatened and Endangered Wildlife List again in the near future because a delisting decision was made to soon. Please reconsider this proposal and leave the GYA grizzly population on the List of Threatened and Endangered Wildlife for the time being.	FWS-R6-ES-2016-0042-3599	
Genetic diversity in the GYA grizzly population may also be significantly affected if the population is allowed to be reduced to 500 animals	1001						Factor E	I am asking you to reconsider your proposal about removing the Greater Yellowstone Area (GYA) population of grizzly bears from the List of Endangered and Threatened Wildlife. Even though the GYA bear population as grown to an estimated 700 animals, with some estimates giving higher number, I believe this number may not be high enough to consider reducing the population through hunting. Currently the whitebark pine in the GYA area which is a main food source for the bears has been greatly reduced due to the mountain pine beetle. With the effects of climate change, further food sources and habitat areas for the grizzlies may be diminished in the future. Genetic diversity in the GYA grizzly population may also be significantly affected if the population is allowed to be reduced to 500 animals. A FWS talking points paper on this issue states that if the population falls below 500, the Montana FWP would transplant bears from other areas to maintain genetic diversity. Why not let the GYA grizzly population grow to a point where the genetic diversity is robust enough, then reconsider the delisting options. One study states that it may take a population of 1850 animals to maintain adequate genetic diversity. Please understand that I am not opposed to hunting, and have hunted big game wildlife in the past. However I see no practical need to hunt grizzly bears. This is trophy hunting only, nothing more, nothing less. Even though the USFWS has approved management plans from the states of Montana, Wyoming, and Idaho, what assurances are there that any or all of these states won't make changes to these plans that would have considerable negative impacts on the grizzly population. There is also no need for depredation hunts, as to my knowledge there is no significant grizzly activity that is causing widespread damage to human or domestic livestock. The growing robust grizzly population is a good thing, and the USFWS should be commended for taking the steps that have allowed this to happen. With this growth comes the inevitable increase of human/grizzly encounters. With more people than ever visiting the Yellowstone area and more bears, this is a predictable situation. However much of the responsibility for these encounters has to be placed on humans. We are visiting the bears habitat, and need to learn to respect that. If humans go out and do stupid things like approach bison or enter bear habitat areas without taking the necessary precautions, it should not be the animals who are blamed and hunted. Finally, it is ironic to me that on the USFWS home web page the winning poster for the 2016 Saving Endangered Species Youth Art Contest. It's hard to miss the grizzly right in the middle of the poster. It would be a shame if the GYA grizzly population is placed right back on the Threatened and Endangered Wildlife List again in the near future because a delisting decision was made to soon. Please reconsider this proposal and leave the GYA grizzly population on the List of Threatened and Endangered Wildlife for the time being.	FWS-R6-ES-2016-0042-3599	

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What with climate change creating food source challenges, these animals are NOT ready to be taken off the Endangered Species list whatsoever. Two of their four major foods have all but been wiped out due to climate change, disease and invasive species.	1006	1000				Factor E	Please don't do this again! We've de-listed the Wolves, the Buffalo, now this - all for a quick buck for tags and hunters coming in. Do you realize there is more money to be MADE by tourists wishing to see these "American" animals? What with climate change creating food source challenges, these animals are NOT ready to be taken off the Endangered Species list whatsoever. Two of their four major foods have all but been wiped out due to climate change, disease and invasive species. And they may be killed if they prey on livestock in their increasingly difficult search for food. Their survival is by no means that significantly improved as there are ONLY 700! That's less than the tiger, who is considered "Endangered" in the world. Please, these Grizzlies as well as the Wolves and Buffalo are National Treasures species not found ANYWHERE else but in the United States. Is there ANYTHING sacred and safe about our heritage that is NOT for SALE? Grizzlies are important to the eco balance of our wilderness area's and must be protected. Their numbers will diminish quickly, and assuredly if you let the hunters move in. Fires in Canada should show you plainly how delicate our situation is with respect to wildlife survival. Please, make our heritage not for sale. I want to see these animals alive not in a virtual reality, zoo, or an old movie. Their contribution our world is too important. Thank you!	FWS-R6-ES-2016-0042-3651	
This iconic AMERICAN animal is in grave danger from humanity. not only from trapping and hunting but because its food source is in short supply, one of which is unsafe due to humanity's usage of pesticides! Isn't it enough that we've FORCED the grizzly to use only 1% of its habitat, which in itself is a travesty with huge consequences. This beautiful animal needs the biodiversity of intermingling with the bears to the north as its gene pool is small. Why on earth we punish those who would try to enlarge the gene pool is beyond me, but again humanity sees fit to kill and punish those bears that dare to try to widen the gene pool by traveling out of its area. In my opinion and millions of other Americans opinions the grizzly bear should not be delisted and should be allowed to traverse much farther so that it will not become extinct!!	1001					Factor E	I and many other Americans are opposed to the de-listing of the Grizzly Bear! This iconic AMERICAN animal is in grave danger from humanity. not only from trapping and hunting but because its food source is in short supply, one of which is unsafe due to humanity's usage of pesticides! Isn't it enough that we've FORCED the grizzly to use only 1% of its habitat, which in itself is a travesty with huge consequences. This beautiful animal needs the biodiversity of intermingling with the bears to the north as its gene pool is small. Why on earth we punish those who would try to enlarge the gene pool is beyond me, but again humanity sees fit to kill and punish those bears that dare to try to widen the gene pool by traveling out of its area. In my opinion and millions of other Americans opinions the grizzly bear should not be delisted and should be allowed to traverse much farther so that it will not become extinct!! We must do everything in our power to help grizzly bears, NOT take away its endangered species listing from it!! Thank you!	FWS-R6-ES-2016-0042-3751	

It seems that although their numbers may be stable or even growing, they are genetically isolated enough through habitat fragmentation	1001					Factor E	I would like to see the grizzly bear remain on the Endangered species list in the lower 48 states. It seems that although their numbers may be stable or even growing, they are genetically isolated enough through habitat fragmentation. Opening up these populations to hunting would quickly bring down numbers to a more critical level. Thank you.	FWS-R6-ES-2016-0042-3765	
Dwindling food sources, moths, cutthroat trout, and white bark pine force them to travel outside the park for food.	1002	1003	1004			Factor E	The purpose of this is to indicate I am opposed to the delisting of grizzlies in Yellowstone. I don't believe they have fully recovered. Dwindling food sources, moths, cutthroat trout, and white bark pine force them to travel outside the park for food. I am not alone in my request that they not be delisted --- Americans want this American icon, our history and heritage - PROTECTED. Please do NOT delist grizzlies.	FWS-R6-ES-2016-0042-3837	
I wish to strongly oppose such a removal for the following reasons: 1.Climate Change Impacts Climate change is a real, scientific and provable issue and the park and its inhabitants have already been affected. To dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." with no proper scientific evidence is laughable.The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule, which is highly questionable. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population. This leads into my second point.	1006					Factor E	I wish to comment on the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I wish to strongly oppose such a removal for the following reasons: 1.Climate Change Impacts Climate change is a real, scientific and provable issue and the park and its inhabitants have already been affected. To dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." with no proper scientific evidence is laughable.The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule, which is highly questionable. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population. This leads into my second point. 2. Declining food resources There is no evidence in The Rule for true accounting on this point. Historically, there have been four critical foods for grizzlies in Yellowstone: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are "generalists with a broad range in diet", but what really is important for maintaining the population is availability of high quality food at the right time of the year within an INTACT ECOSYSTEM. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. These four points have not been taken into consideration. This is unscientific. 3. Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase numbers in the ecosystem (ref. Fig. 1 p 13180, of The Rule). Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. Do the math: mortality levels of recent years is not sustainable. 4. Population Estimates A remote and rugged area such as the Greater Yellowstone ecosystem posed problems for accurate measurement. Accuracy- real accuracy- is necessary for making such a huge decision about delisting.The current methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by any subsequent IGBST rebuttal and so I would think it fair and in the interests of science for all data regarding grizzly numbers to be made available for truly independent scientific	FWS-R6-ES-2016-0042-3805	

2. Declining food resources There is no evidence in The Rule for true accounting on this point. Historically, there have been four critical foods for grizzlies in Yellowstone: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. That leaves meat as the only remaining high-quality food resource. 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Accuracy- real accuracy- is necessary for making such a huge decision about delisting. The current methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by any subsequent IGBST rebuttal and so I would think it	FWS-R6-ES-2016-0042-3805	
5. Genetic Viability To have a healthy Grizzly population now and into the future, genetic diversity is imperative. The Greater Yellowstone Grizzly bear population is an island so to speak. It is apart from all other grizzly populations. This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. This is not good science- nor are you protecting the genetic stock for the future should you narrow the gene pool.	1001					Factor E	I wish to comment on the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I wish to strongly oppose such a removal for the following reasons: 1. Climate Change Impacts Climate change is a real, scientific and provable issue and the park and its inhabitants have already been affected. To dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." with no proper scientific evidence is laughable. The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule, which is highly questionable. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population. This leads into my second point. 2. Declining food resources There is no evidence in The Rule for true accounting on this point. Historically, there have been four critical foods for grizzlies in Yellowstone: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are "generalists with a broad range in diet", but what really is important for maintaining the population is availability of high quality food at the right time of the year within an INTACT ECOSYSTEM. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. These four points have not been taken into consideration. This is unscientific. 3. Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase numbers in the ecosystem (ref. Fig. 1 p 13180, of The Rule). Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. Do the math: mortality levels of recent years is not sustainable. 4. Population Estimates A remote and rugged area such as the Greater Yellowstone ecosystem posed problems for accurate measurement. Accuracy- real accuracy- is necessary for making such a huge decision about delisting. The current methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by any subsequent IGBST rebuttal and so I would think it	FWS-R6-ES-2016-0042-3805	
Climate change will continue to alter habitat and affect food sources, along with impacts to behavior, seasonal shifts, among other unknowns. Two important bear foods in the GYE, Whitebark pine and westslope cutthroat trout, continue to decline due to climate change and competition with invasives. Although bears are opportunistic eaters, the GYE is not very abundant or diverse in its food sources. Fewer natural food sources to choose from mean that grizzly bears will likely be forced out of the protected boundary in search of other food items that may get them into trouble, such as cattle and garbage. Unprotected bears, wandering outside of the park in search of food only to find the end of a rifle may lead to a much larger reduction in population than the FWS is proposing with its 675 target, especially since humans can already kill grizzlies they perceive to be a threat to their life or property. Now is not the time to remove GYE grizzly bears from protection, when climate change will only continue to raise temperatures and cause additional impacts yet to be identified. I am against delisting the GYE grizzly bear. The unknown impacts of climate change are far too great to not be adequately taken into account when proposing delisting. USFWS suggest that all bear foods are equal and can easily be interchanged, however, this is not the case. Whitebark pine nuts are high in protein and, when they were still in abundance, low in energy loss. Scientists have yet to find an alternative equivalent to the high protein, low caloric output in the GYE. Additionally, grizzly bears are among the slowest reproducing land mammals in North America and females undergo delayed implantation. If a female grizzly has mated but does not put on enough pounds over the summer months to sustain and bear the energetic costs of pregnancy during hibernation, the blastocyst will not implant in her uterus and she will not give birth. Thus without adequate food sources, it will be very difficult for female GYE grizzly to reproduce and sustain the population.	1006	1002	1003			Factor E	I am against delisting the GYE grizzly bear. Climate change will continue to alter habitat and affect food sources, along with impacts to behavior, seasonal shifts, among other unknowns. Two important bear foods in the GYE, Whitebark pine and westslope cutthroat trout, continue to decline due to climate change and competition with invasives. Although bears are opportunistic eaters, the GYE is not very abundant or diverse in its food sources. Fewer natural food sources to choose from mean that grizzly bears will likely be forced out of the protected boundary in search of other food items that may get them into trouble, such as cattle and garbage. Unprotected bears, wandering outside of the park in search of food only to find the end of a rifle may lead to a much larger reduction in population than the FWS is proposing with its 675 target, especially since humans can already kill grizzlies they perceive to be a threat to their life or property. Now is not the time to remove GYE grizzly bears from protection, when climate change will only continue to raise temperatures and cause additional impacts yet to be identified. I am against delisting the GYE grizzly bear. The unknown impacts of climate change are far too great to not be adequately taken into account when proposing delisting. USFWS suggest that all bear foods are equal and can easily be interchanged, however, this is not the case. Whitebark pine nuts are high in protein and, when they were still in abundance, low in energy loss. Scientists have yet to find an alternative equivalent to the high protein, low caloric output in the GYE. Additionally, grizzly bears are among the slowest reproducing land mammals in North America and females undergo delayed implantation. If a female grizzly has mated but does not put on enough pounds over the summer months to sustain and bear the energetic costs of pregnancy during hibernation, the blastocyst will not implant in her uterus and she will not give birth. Thus without adequate food sources, it will be very difficult for female GYE grizzly to reproduce and sustain the population.	FWS-R6-ES-2016-0042-3861	

In the early 19th century, tens of thousands of grizzlies roamed the Greater Yellowstone Ecosystem; there are approximately 700 there now, thanks to the ESA protections they've received since 1975. Those 700 bears exist in an island population where the ongoing effects of climate change are affecting food sources such as white bark pine seeds and cutthroat trout.	1001	1006	1002	1003		Factor E	Please see attached letter and please do not de-list the Greater Yellowstone Ecosystem grizzlies. Attachments Grizzly_08May2016	FWS-R6-ES-2016-0042-3888	
The proposed rule does not address the genetic isolation of the bears, the issues that are caused by declining food sources, and the fact that grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. This problem is exacerbated by the poaching of bears that occurs even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. This will lead them into most populated areas and make them more vulnerable to being killed. Therefore it is necessary for them to remain protected and allowed to exist in an area that keeps them safe and does not encourage them to seek food and shelter elsewhere.	1001	1000				Factor E	The proposed rule does not address the genetic isolation of the bears, the issues that are caused by declining food sources, and the fact that grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. This problem is exacerbated by the poaching of bears that occurs even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. This will lead them into most populated areas and make them more vulnerable to being killed. Therefore it is necessary for them to remain protected and allowed to exist in an area that keeps them safe and does not encourage them to seek food and shelter elsewhere.	FWS-R6-ES-2016-0042-3889	
Furthermore, the FWS claim that a shortage of cutthroat trout and whitebark pine nutsâ€”two of the grizzlyâ€™s primary foodsâ€”is not a threat to the grizzlyâ€™s long term survival. Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council.	1002	1003				Factor E	Please see attached comment. Attachments Letter to the FWS on De-lisiting the Grizzly	FWS-R6-ES-2016-0042-3929	

Their population is not even fully recovered, they are struggling with loss of food due to climate change. They reproduce so slowly this will devastate their not yet fully recovered population. The ESA was not designed to have animals taken off and immediately hunted! Trophy hunted... Only 33% of hunters even want this and we should not be catering to them, but rather look at the numbers , understand the grave impact and do not delist them.	1006	1000					Factor E	I do not believe grizzly bears should be taken off of the endangered species list. Their population is not even fully recovered, they are struggling with loss of food due to climate change. They reproduce so slowly this will devastate their not yet fully recovered population. The ESA was not designed to have animals taken off and immediately hunted! Trophy hunted... Only 33% of hunters even want this and we should not be catering to them, but rather look at the numbers , understand the grave impact and do not delist them. Thank you.	FWS-R6-ES-2016-0042-3935	
Hunting would be an easier swallow if restoration was being done in other states & Mexico. It would also move the attention of environmental groups to areas outside of Yellowstone, that way your grizzly population would not be their sole focus & you wouldn't be alone to work with that anymore. Bears taken by hunters & the transferring of bears to new populations would provide an opportunity, for bears to be brought to Yellowstone from Canada & bring new genes.	1001						Factor E	Hello, My name is David Galvan. I am an Eagle Scout, & live on the Oregon Coast. First off, thank you for getting the bears this far & for the work you do. My state lost it's grizzlies many many decades ago. I can't imagine them coming back all that soon. But the bears of Yellowstone would likely be the source of such a return & so... If delisting occurs or not, please make the restoration of the bruin outside of Yellowstone a greater priority. I think rewilding is both in the best interest of the bear & an opportunity to meet the needs of a more diverse public. Hunting would be an easier swallow if restoration was being done in other states & Mexico. It would also move the attention of environmental groups to areas outside of Yellowstone, that way your grizzly population would not be their sole focus & you wouldn't be alone to work with that anymore. Bears taken by hunters & the transferring of bears to new populations would provide an opportunity, for bears to be brought to Yellowstone from Canada & bring new genes. So it could feed back into making Yellowstone's bears more robust. The idea of them being delisted doesn't appeal to me. But I do see opportunity. Please take that opportunity to help bring the bear back home.	FWS-R6-ES-2016-0042-4096	
Exactly how does it make any sense to delist the grizzly from the endangered and/or threatened wildlife list when they are so genetically isolated as it is in the lower 48? By doing this, you open up the grizzly population to trophy hunters in the lower 48, a range so sparse of grizzlies that the species has no real chance of competing with hunter harvesting in terms of recovering. Makes me wonder the "science" behind such decisions.	1001						Factor E	Exactly how does it make any sense to delist the grizzly from the endangered and/or threatened wildlife list when they are so genetically isolated as it is in the lower 48? By doing this, you open up the grizzly population to trophy hunters in the lower 48, a range so sparse of grizzlies that the species has no real chance of competing with hunter harvesting in terms of recovering. Makes me wonder the "science" behind such decisions.	FWS-R6-ES-2016-0042-4047	

There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. Å	1000	1006					Factor E Florida's Bear Hunt was a travesty with 300 bears killed in 2 days,some with babies even though that was against the rules. My family has a second home in Montana in Polson and this is just wrong. THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected. #DontDelistGrizzlies! #ROAR!	FWS-R6-ES-2016-0042-4229	
The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversityand dispersing individuals are subject to persecution, making connectivity all that much less likely.	1001						Factor E Please do NOT remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife! 1) The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. 2) Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. 3) Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations in particular and with humans in general can be expected as grizzlies are forced to range ever farther looking for food sources to replace those lost in recent years. 4) GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, they are particularly vulnerable to excessive killing by humans. Last year 59 grizzlies were killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow-reproducing species. 5) TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states KNOWN for their hatred of and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and MOST Americans (55%) OPPOSE de-listing. Even more Americans (68%) OPPOSE the hunting of grizzly bears. Thank you, HJ	FWS-R6-ES-2016-0042-4240	
EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. Å DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. Å GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected.	1002						Factor E Florida's Bear Hunt was a travesty with 300 bears killed in 2 days,some with babies even though that was against the rules. My family has a second home in Montana in Polson and this is just wrong. THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected. #DontDelistGrizzlies! #ROAR!	FWS-R6-ES-2016-0042-4229	

With the loss of whitebark pine, grizzlies have turned to a diet more focused on meat. This conversion to meat puts bears in greater conflict with humans - namely hunters and livestock operations. What happens when grizzlies conflict with humans? Grizzlies die. In fact, a record number of grizzly bears died in the Yellowstone ecosystem just last year. Moreover, 80% of adult grizzly deaths can be attributed to human causes.	1002						Factor E	I oppose delisting of grizzly bears because (1) the population has not grown in recent decades, (2) death rates have actually increased, and (3) changes to food sources puts grizzly bears in greater conflict with humans. First, even the United States Fish & Wildlife Service concedes that the Yellowstone grizzly population has not grown since the early 2000s. Indeed, there are nearly as many bears in the ecosystem today as there were 15 years ago. It is true the bears are more visible but this is not due to a population increase. Rather, this is due to changing food sources which force grizzlies to range further in search of food. Even though they are omnivores, not all foods are created equal. We humans, as omnivores, know that a steak does not equal a salad. With the loss of whitebark pine, grizzlies have turned to a diet more focused on meat. This conversion to meat puts bears in greater conflict with humans - namely hunters and livestock operations. What happens when grizzlies conflict with humans? Grizzlies die. In fact, a record number of grizzly bears died in the Yellowstone ecosystem just last year. Moreover, 80% of adult grizzly deaths can be attributed to human causes. Grizzly bear deaths are actually increasing in the ecosystem. From 2002-2011, grizzly deaths increased at a rate of 9-11% a year. Therefore, the population is not necessarily stable. With a stagnant growth rate and increasing death rate, why would USFWS even be considering removing these bears from the Endangered Species List? Please listen to the science - the best available science - and keep Yellowstone area grizzly bears protected under the Endangered Species Act.	FWS-R6-ES-2016-0042-4244	
Even if protections are restored after a population collapse, the bottleneck effect will result in an irreversible loss of genetic diversity that will affect the long-term security of the population. Any action that makes it legal to sell hunting permits for the grizzly bear should be rejected without consideration unless surveillance technology is mandated to eliminate the threat of poaching, and the number of licenses to be issued is determined by an independent panel of ecological researchers.	1001						Factor E	700 individuals may be enough to sustain a safe population, but that number will rapidly collapse due to over-hunting if the animals are removed from the endangered species list. Poaching will be masked by legitimate hunting activity, and there is a significant risk that too many licenses will be issued. Even if protections are restored after a population collapse, the bottleneck effect will result in an irreversible loss of genetic diversity that will affect the long-term security of the population. Any action that makes it legal to sell hunting permits for the grizzly bear should be rejected without consideration unless surveillance technology is mandated to eliminate the threat of poaching, and the number of licenses to be issued is determined by an independent panel of ecological researchers.	FWS-R6-ES-2016-0042-4265	
Recent evidence is suggesting that the grizzly bear population of the GYA may already be heading for decline due to the continued loss of two of its major food sources the white pine nut and the steelhead trout. The source of the white pine nut has been decimated by the infestation of the white pine by the mountain pine beetle in this area. Due to climate change this infestation has been allowed to move further up into the grizzlies' habitat. Studies show that the availability of the white pine nut is essential to maintain a healthy bear population. The steelhead trout, another food source, has seen a decline in population due to the introduction of invasive species into the area. Investigation into the causes, solution, and overall effect of these ecological pressures are ongoing and inconclusive. This only strengthens the need to keep the grizzly on the Endangered Species list to allow for more research in order to access the further impact it may have on the bear population.	1002	1003	1006				Factor E	See attached file(s) Attachments Alex Public Comment	FWS-R6-ES-2016-0042-4267	

To make matters worse, America's great bears face the same looming threats as many species across the country due to climate change. In the last decade, climate change has decimated the Yellowstone grizzly's most important food, the white bark pine nut.	1006	1002				Factor E	I OPPOSE DESISTING OF GRIZZLY BEARS! This is the most ridiculous idea ever! I travel to Yellowstone multiple times per year so I can get a glimpse of them in either Yellowstone or Grand Teton. Idaho, Wyoming and Montana are pro-hunting states and won't delay issuing hunting licenses immediately! These creatures would go from full protection to being hunted. They are used to human populations and is equivalent to shooting fish in the proverbial barrel. Americans would never accept hunting of America's bald eagle; hunting Yellowstone grizzly bears is equally unacceptable. To make matters worse, America's great bears face the same looming threats as many species across the country due to climate change. In the last decade, climate change has decimated the Yellowstone grizzly's most important food, the white bark pine nut. Unfortunately, the March 3, 2016, delisting announcement by the U.S. Fish and Wildlife Service (FWS) came paired with an astonishing declaration in the Federal Register: "Therefore, we conclude that the effects of climate change do not constitute a threat to the [Yellowstone grizzly bear population] now, nor are they anticipated to in the future." This statement is even more disturbing in light of your administration's commitment to addressing climate change, because climate change predictions are dire for all our planet's species. How can it be that the military considers climate change in all its decisions, while the agency responsible for our wildlife, the FWS, does not? The same argument - the denial of climate change - was used by the FWS in 2014 to deny listing the wolverine in the lower 48 states. On April 4, 2016, that decision was reversed in federal court, and declared "arbitrary and capricious." The FWS was ordered to reconsider its reasoning about climate change. It's now time for this federal agency to play catch up and use "the best available science" to keep grizzly bears on the ESA list. A critical question: Who benefits from delisting Yellowstone's grizzly bears? The only certain outcome of delisting bears will be trophy hunts in Idaho, Montana and Wyoming. We ask you to instruct our federal wildlife managers to withdraw the March 3 rule and order the FWS to take another look at how climate change impacts grizzly bears. Any decision about the bear's future should be put on hold until independent scientific review can explore potential impacts to bears from climate change. We strongly suspect that America's great bears face a dire future, even with the continued protection of the Endangered Species Act.	FWS-R6-ES-2016-0042-4264	
Climate change will continue to alter habitat and affect food sources, along with impacts to behavior, seasonal shifts, among other unknowns. Two important bear foods in the GYE, Whitebark pine and westslope cutthroat trout, continue to decline due to climate change and competition with invasives.	1002	1003	1006			Factor E	Not Right I am against delisting the GYE grizzly bear. Climate change will continue to alter habitat and affect food sources, along with impacts to behavior, seasonal shifts, among other unknowns. Two important bear foods in the GYE, Whitebark pine and westslope cutthroat trout, continue to decline due to climate change and competition with invasives. Although bears are opportunistic eaters, the GYE is not very abundant or diverse in its food sources. Fewer natural food sources to choose from mean that grizzly bears will likely be forced out of the protected boundary in search of other food items that may get them into trouble, such as cattle and garbage. Unprotected bears, wandering outside of the park in search of food only to find the end of a rifle may lead to a much larger reduction in population than the FWS is proposing with its 675 target, especially since humans can already kill grizzlies they perceive to be a threat to their life or property. Now is not the time to remove GYE grizzly bears from protection, when climate change will only continue to raise temperatures and cause additional impacts yet to be identified. Thank you!	FWS-R6-ES-2016-0042-4272	
The same argument - the denial of climate change - was used by the FWS in 2014 to deny listing the wolverine in the lower 48 states. On April 4, 2016, that decision was reversed in federal court, and declared "arbitrary and capricious." The FWS was ordered to reconsider its reasoning about climate change. It's now time for this federal agency to play catch up and use "the best available science" to keep grizzly bears on the ESA list.	1006					Factor E	I OPPOSE DESISTING OF GRIZZLY BEARS! This is the most ridiculous idea ever! I travel to Yellowstone multiple times per year so I can get a glimpse of them in either Yellowstone or Grand Teton. Idaho, Wyoming and Montana are pro-hunting states and won't delay issuing hunting licenses immediately! These creatures would go from full protection to being hunted. They are used to human populations and is equivalent to shooting fish in the proverbial barrel. Americans would never accept hunting of America's bald eagle; hunting Yellowstone grizzly bears is equally unacceptable. To make matters worse, America's great bears face the same looming threats as many species across the country due to climate change. In the last decade, climate change has decimated the Yellowstone grizzly's most important food, the white bark pine nut. Unfortunately, the March 3, 2016, delisting announcement by the U.S. Fish and Wildlife Service (FWS) came paired with an astonishing declaration in the Federal Register: "Therefore, we conclude that the effects of climate change do not constitute a threat to the [Yellowstone grizzly bear population] now, nor are they anticipated to in the future." This statement is even more disturbing in light of your administration's commitment to addressing climate change, because climate change predictions are dire for all our planet's species. How can it be that the military considers climate change in all its decisions, while the agency responsible for our wildlife, the FWS, does not? The same argument - the denial of climate change - was used by the FWS in 2014 to deny listing the wolverine in the lower 48 states. On April 4, 2016, that decision was reversed in federal court, and declared "arbitrary and capricious." The FWS was ordered to reconsider its reasoning about climate change. It's now time for this federal agency to play catch up and use "the best available science" to keep grizzly bears on the ESA list. A critical question: Who benefits from delisting Yellowstone's grizzly bears? The only certain outcome of delisting bears will be trophy hunts in Idaho, Montana and Wyoming. We ask you to instruct our federal wildlife managers to withdraw the March 3 rule and order the FWS to take another look at how climate change impacts grizzly bears. Any decision about the bear's future should be put on hold until independent scientific review can explore potential impacts to bears from climate change. We strongly suspect that America's great bears face a dire future, even with the continued protection of the Endangered Species Act.	FWS-R6-ES-2016-0042-4264	

We ask you to instruct our federal wildlife managers to withdraw the March 3 rule and order the FWS to take another look at how climate change impacts grizzly bears. Any decision about the bear's future should be put on hold until independent scientific review can explore potential impacts to bears from climate change.	1006					Factor E	I OPPOSE DESISTING OF GRIZZLY BEARS! This is the most ridiculous idea ever! I travel to Yellowstone multiple times per year so I can get a glimpse of them in either Yellowstone or Grand Teton. Idaho, Wyoming and Montana are pro-hunting states and won't delay issuing hunting licenses immediately! These creatures would go from full protection to being hunted. They are used to human populations and is equivalent to shooting fish in the proverbial barrel. Americans would never accept hunting of America's bald eagle; hunting Yellowstone grizzly bears is equally unacceptable. To make matters worse, America's great bears face the same looming threats as many species across the country due to climate change. In the last decade, climate change has decimated the Yellowstone grizzly's most important food, the white bark pine nut. Unfortunately, the March 3, 2016, delisting announcement by the U.S. Fish and Wildlife Service (FWS) came paired with an astonishing declaration in the Federal Register: "Therefore, we conclude that the effects of climate change do not constitute a threat to the [Yellowstone grizzly bear population] now, nor are they anticipated to in the future." This statement is even more disturbing in light of your administration's commitment to addressing climate change, because climate change predictions are dire for all our planet's species. How can it be that the military considers climate change in all its decisions, while the agency responsible for our wildlife, the FWS, does not? The same argument - the denial of climate change - was used by the FWS in 2014 to deny listing the wolverine in the lower 48 states. On April 4, 2016, that decision was reversed in federal court, and declared "arbitrary and capricious." The FWS was ordered to reconsider its reasoning about climate change. It's now time for this federal agency to play catch up and use "the best available science" to keep grizzly bears on the ESA list. A critical question: Who benefits from delisting Yellowstone's grizzly bears? The only certain outcome of delisting bears will be trophy hunts in Idaho, Montana and Wyoming. We ask you to instruct our federal wildlife managers to withdraw the March 3 rule and order the FWS to take another look at how climate change impacts grizzly bears. Any decision about the bear's future should be put on hold until independent scientific review can explore potential impacts to bears from climate change. We strongly suspect that America's great bears face a dire future, even with the continued protection of the Endangered Species Act.	FWS-R6-ES-2016-0042-4264	
On behalf of our millions of members, we, the undersigned 84 organizations, oppose the U.S. Fish and Wildlife Service (FWS) proposal to remove grizzly bears (<i>Ursus arctos</i>) in the Greater Yellowstone Ecosystem (GYE) as threatened from the U.S. Endangered Species Act (ESA). The proposal is premature as the GYE grizzly bear population remains in peril from the combined effects of habitat loss and fragmentation, climate change, decline of primary food sources, and human-caused mortality. 1 Delisting and subsequently adding the threat of mortality from trophy hunting could seriously jeopardize grizzly bears	1006					Factor E	Please accept as part of the record the attached letter, signed by 84 organizations, in opposition to the delisting proposal. This replaces comment tracking number 1k0-8pj9-lrmv. Attachments Yellowstone Grizzly-Sign-on Letter 2016_05.09 84	FWS-R6-ES-2016-0042-4326	
Grizzly bears€™ two primary staple foods, whitebark pine and cutthroat trout, are in precipitous decline.9 This should signal to wildlife managers that grizzly bear conservation efforts should not be stripped away at the very time when they face a food crisis. These food losses have caused bears to reduce their density from their core, protected habitat as they disperse further afield to find sufficient food resources. Compounded with these threats, removal from federal listing would jeopardize the continued health and persistence of the GYE grizzly bear population.	1002	1003				Factor E	Please accept as part of the record the attached letter, signed by 84 organizations, in opposition to the delisting proposal. This replaces comment tracking number 1k0-8pj9-lrmv. Attachments Yellowstone Grizzly-Sign-on Letter 2016_05.09 84	FWS-R6-ES-2016-0042-4326	

USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears. A	1006					Factor E	#NAME?	FWS-R6-ES-2016-0042-4274	
State and federal agencies have not addressed the mounting threats of human development, climate change, invasive species, and the subsequent loss or diminishment of key foods, including whitebark pine seeds, cutthroat trout, and elk.	1006	1002	1003	1005		Factor E	I write to express my opposition to delisting of Yellowstone grizzly bears, and support of the efforts of Tribes to preserve the iconic and sacred Great Bear. State and federal agencies have not addressed the mounting threats of human development, climate change, invasive species, and the subsequent loss or diminishment of key foods, including whitebark pine seeds, cutthroat trout, and elk. As bears seek out yet more meat to compensate for the collapse of these foods, they are being killed at unsustainably high rates that threaten their survival. I am concerned that delisting would give full management authority to the states of Idaho, Wyoming and Montana, which are notoriously hostile to large carnivores. State management guarantees a grizzly bear sport hunt, which is not justified in light of current excessive mortality rates. Further, if grizzly bears are delisted, the states plan to eliminate them in habitat that is critical to their long-term recovery.Despite significant reductions in the availability of human foods and attractants to grizzly bears, humans are still the number one cause of bear mortality. Instead of delisting, a move that would dry up funds and lower agency commitment to coexistence programs, the Department of Interior should redouble efforts to reduce human-bear conflicts. Delisting is also premature due to the long-term isolation of Yellowstone's grizzly bears. Relying on trucking in bears to deal with the problem of genetic isolation is risky and unwise, especially when it is still possible to naturally reconnect Yellowstone and Northern Continental Divide grizzly bear populations. Restoration of grizzly bears in the vast Selway Bitterroot recovery area would also boost connectivity between Northern Rockies ecosystems. Delisting and sport hunting would undermine prospects for connectivity and permanently isolate Yellowstone's grizzly bears. I support the efforts of a growing coalition of Tribes that is dedicated to protecting Yellowstone's bears and preventing delisting. I ask that you initiate formal consultation with all involved tribes, and promptly correct the disrespectful and dismissive behavior of your staff towards Indian people involved with the grizzly bear issue. The sovereignty of Tribes must be recognized and respected Recovery of the Yellowstone grizzly bear population is achievable, but not if the hard-fought gains of the last 40 years are reversed by delisting. Please do not risk the future of Yellowstone's iconic grizzly bears. Thank you for your consideration	FWS-R6-ES-2016-0042-4399	
Meanwhile grizzlies are losing some of their major food sources - whitebark pine, cutthroat trout, army cutworm moths. This is forcing them to seek more protein (elk, deer, livestock), which humans also want, bringing the bears into more conflict with ranchers and hunters, and bringing the bears into forests and rangelands (where there are more people) instead of staying in the high country.	1002	1003	1004	1005		Factor E	Hello and thank you for this opportunity to comment on the proposed delisting of the Yellowstone grizzly bear population. I oppose this proposal for many reasons. My comments are dedicated to the memory of Scarface, a magnificent male grizzly who was about 25 years old and was shot and left for dead last fall outside of Jardine, Montana. I have some great memories of watching him - he was a smart and wiley old bear who caused no problems for people, but still got shot. Chris Servheen, the federal coordinator for grizzly bear recovery, is mostly interested in his own career, and delisting is mainly a political and personal objective for him. He is arrogant and selfish and should have been fired long ago. While there is no doubt that grizzlies have come a long way in the Yellowstone area since 1972 when there were maybe 130 left, they have a long way to go. Recovery is in serious jeopardy with at least 70 bears killed last year. Numbers have flattened and reproduction is probably declining. The population is aging. The Yellowstone ecosystem is under heavy pressure from human population and development, with more wild habitat developed every day. While the heyday of logging and road building has passed, recreational development and activity has skyrocketed. Grizzly habitat is getting crunched. Subdivisions are sprouting up everywhere. I live in Bozeman, where everything is former grizzly habitat (my house included), and the pace of development is mind blowing. Meanwhile grizzlies are losing some of their major food sources - whitebark pine, cutthroat trout, army cutworm moths. This is forcing them to seek more protein (elk, deer, livestock), which humans also want, bringing the bears into more conflict with ranchers and hunters, and bringing the bears into forests and rangelands (where there are more people) instead of staying in the high country. Not to mention that hundreds of bison are removed from the ecosystem nearly every year due to paranoia about brucellosis. How many grizzlies could those bison feed? Nor can grizzlies safely or effectively reach other populations of grizzlies to the north, meaning the Yellowstone grizzlies are totally isolated. Thus they cannot interbreed with other populations nor supplement their numbers from outside the ecosystem. One can hardly call this recovery. Instead we should be reintroducing grizzlies to the extensive public wildlands of Central Idaho. Delisting will mean turning management over to the states of Montana, Wyoming and Idaho, all of whom are drooling over the chance to hunt grizzlies. This makes me sick. So we spend all this time and effort to recover the grizzly, just so some rednecks can turn them into trophies? Is that the best we can do? I work as a guide and naturalist in Yellowstone Park. The biggest thing my guests want to see is bears and wolves, especially grizzly bears. People pay a lot of money to come here with the hope of seeing these animals. They get to enjoy them and leave them for others to do the same. Hunting predators like grizzlies is selfish and greedy, and is a one-time use. What it really comes down to is respect for other lives than our own. Can we be wise enough and tolerant enough to let the great bear exist on its own merit? Or must we take away the protection they need so we can pretend we have saved them? Attachments DSC07180	FWS-R6-ES-2016-0042-4434	

These animals need protection, as they cannot sustain their genetic diversity if their numbers are thinned.	1001					Factor E	These animals need protection, as they cannot sustain their genetic diversity if their numbers are thinned. It's taken so long to get them to this point, allowing hunting is pure folly.	FWS-R6-ES-2016-0042-4519	
Grizzly populations face many uncertainties relating to food sources, climate change, and the like.	1006	1000				Factor E	Delisting is premature. Grizzly populations face many uncertainties relating to food sources, climate change, and the like. The additional threat of hunting may very well cause another population collapse.	FWS-R6-ES-2016-0042-4559	
Are other natural or manmade factors affecting its continued existence? (Agriculture. Tourism. Hunting. Yes.)						Factor E	Please don't remove this beautiful and iconic species from the list. Your criteria (http://nctc.fws.gov/pubs9/delisting.pdf): Is there a present or threatened destruction, modification, or curtailment of species' habitat or range? (In some cases, yes.) Is species subject to overutilization for commercial, recreational, scientific, or educational purposes? (Hunting is, arguably, recreational utilization; so, yes.) Is disease or predation a factor? (If hunting is counted as predation, yes.) Are there inadequate existing regulatory mechanisms in place outside the ESA (taking into account the efforts by the States and other organizations to protect the species or habitat)? (Perhaps. But we know how that goes. Look at Florida's massive bear hunt.) Are other natural or manmade factors affecting its continued existence? (Agriculture. Tourism. Hunting. Yes.) People already camp right at the park borders to snipe wolves as they cross the invisible boundary into unprotected space. We all know what's going to happen to the bears as soon as they lose their protected status. Every trophy hunter will be standing in line to take one down. California lost it's great bears and wolves years ago. It would be a tremendous shame to see it happen elsewhere. https://youtu.be/oz7tSGxGue0	FWS-R6-ES-2016-0042-4583	

However, they could well be moving out of the area because of lack of food. Their primary protein source, the cutthroat trout, is gone from Yellowstone Lake and related spawning streams because of the lake trout. Other food sources like the whitebark pine nut stands are also failing. Stand that are still viable are outside of the park and in areas where the grizzlies would be hunted and killed.	1003	1002					Factor E	May 9, 2016 The Portneuf Valley Audubon Society is opposed to delisting the Yellowstone grizzly from the Federal List of Endangered and Threatened Wildlife for the following reasons: 1.) We do not trust the states to do a good job. Wyoming has done so badly with wolves that a federal judge took management away from them. Idaho Fish and Game sneaked a hunter into the Frank Church-River of No Return Wilderness to kill wolves because they felt the wolves were taking too many elk in the Chambelain Basin. This was done without public knowledge or input. The state fish and game agencies are under constant pressure to kill predators from state politicians who oppose their protection and wish to see them eradicated. Grizzlies, and largest and most charismatic of western omnivores, would certainly be no exception. 2.) There is not strong evidence that the Yellowstone grizzly has recovered. The U.S. Fish and Wildlife Service claims that the bears are recovered because they are dispersing out of Yellowstone National Park and the primary conversation area. However, they could well be moving out of the area because of lack of food. Their primary protein source, the cutthroat trout, is gone from Yellowstone Lake and related spawning streams because of the lake trout. Other food sources like the whitebark pine nut stands are also failing. Stand that are still viable are outside of the park and in areas where the grizzlies would be hunted and killed. Since 2003 there have been approximately 700 grizzlies reported in the Greater Yellowstone Ecosystem. Numbers for 2015 are 717. These numbers do not suggest recovery but simply the same number of bears over 12 years, give or take, and these bears are dispersing. If they were leaving because of increased population, not lack of food, we would expect to see an increase in the number of bears. This has not happened. 3.) Finally, we believe the wish on the part of U.S. Fish and Wildlife Services to delist the Yellowstone grizzly could well be due to politics, not science. It is well known that the current director, Dan Ashe, is no friend of endangered and threatened species. He has been hostile to wolf recovery, listing the obviously threatened sage grouse, and is willing to allow wind farms' collateral kill of bald eagles to increase from 1000 to 4000 annually. For these reasons we oppose delisting the Yellowstone grizzly. It is obvious the bears are a favorite with the public and we fear, with good reason, that the states of Wyoming and Idaho will do their best to kill them once federal protection is removed. Jackie Johnson Mauaghan, treasurer	FWS-R6-ES-2016-0042-4648	
Declining food sources. Historically bears dependent on 4 food sources - 2 of which (whitebark pine and cutthroat trout) are disappearing and moths, their third main food source, are unreliable food source due to pesticides. A	1002	1003	1004				Factor E	There are several reasons to not delist the Grizzly bear. The proposed rule does not address genetic isolation of the bears. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - Declining food sources. Historically bears dependent on 4 food sources - 2 of which (whitebark pine and cutthroat trout) are disappearing and moths, their third main food source, are unreliable food source due to pesticides. - Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. - Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. - Grizzlies occupy only 1% of their historic range. - Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. - If hunting is allowed, there should be a 5-year moratorium on hunting until states can prove that they can manage the grizzly population effectively. - If hunting is allowed, there must be buffer zones around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park. - DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states known for their hatred and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and most Americans (55%) oppose delisting. Even more Americans (68%) oppose hunting of grizzly bears if delisted. - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears. - GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, it is particularly vulnerable to excessive killing by humans. Last year, saw 50 grizzlies killed by humans in the	FWS-R6-ES-2016-0042-4679	
The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001).	1000						Factor E	The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. -The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. -The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). -USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat.	FWS-R6-ES-2016-0042-4717	

USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat.	1006	1002					Factor E	USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat.	FWS-R6-ES-2016-0042-4752	
There are several factors that are threatening the survival of grizzlies - among them the loss of the cutthroat trout and the whitebark pine beetle. If these critically important food sources collapse, the grizzlies will be in trouble.	1002	1003					Factor E	If you're going to delist Grizzlies, it should be based on sound science. It is not. USFWS claims there are 700 bears in the Greater Yellowstone ecosystem, but that's a guess that is challenged by researchers that have worked with them for 20 years. There are several factors that are threatening the survival of grizzlies - among them the loss of the cutthroat trout and the whitebark pine beetle. If these critically important food sources collapse, the grizzlies will be in trouble. Grizzlies reproduce slowly. Cubs are with their mothers for three years. Although the state plans will no doubt take this into account, there has not been any serious attempt at penalizing poor judgement or vision on the part of hunters. As we have seen with wolves we have a "Oh golly gee I thought it was a coyote" attitude and NO penalties. Grizzlies cannot withstand that kind of assault.	FWS-R6-ES-2016-0042-4776	
THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc.	1006	1000					Factor E	THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources.	FWS-R6-ES-2016-0042-4805	

The population is not spread out far enough to ensure a healthy gene pool for future generations	1001					Factor E	It is not in the best interest of the grizzly bear to be taken off the endangered species list for many reasons. 1) The population is not spread out far enough to ensure a healthy gene pool for future generations 2) The population has grown but not to a substantial amount 2.1) The hunting of Grizzly bears will become rapidly popular and the population will not be able to keep up with demand from the hunting season. The number of deaths will be greater than births. 2.2) As a result of a population not being able to keep up the bears will shortly be put back into a dangerous number 3) Once you've opened the Grizzly Bear to hunting, eventually if the time comes to revoke that decision, the amount of poachers will be greater than it is today.	FWS-R6-ES-2016-0042-4865	
EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food x sources. Ä	1000					Factor E	THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources.	FWS-R6-ES-2016-0042-4805	
Grizzlies in the Greater Yellowstone Ecosystem continue to face catastrophic losses to several of their key food sources, such as white bark pine and cutthroat trout. The service's recent research on white bark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy white bark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals. Ä	1002	1003				Factor E	In memory of Scarface, who was killed by a hunter in November, and news of his death was withheld until after the comment period to State Fish and Wildlife, and as the deadline for commenting on this Docket, I would like to add to my previous statements. Issue No. 1 - Grizzlies in the Greater Yellowstone Ecosystem continue to face catastrophic losses to several of their key food sources, such as white bark pine and cutthroat trout. The service's recent research on white bark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy white bark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals. Issue No. 2 - Grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between white bark pine productivity and grizzly bear mortality. Now that white bark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers because of natural causes and human intervention is short-sighted and unnecessary. Issue No. 3 - The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. Issue No. 4 - The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the long term. Issue No. 5 - In Wyoming, where Governor Mead has already expressed his approval of Bear Trophy Hunting, the decision of the USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). Issue No. 6 - USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the white bark pine stands and potential impacts on denning habitat. Issue No. 7 - What's the Rush? There are too many unknowns right now, regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population. Why not wait five years to see how the population is responding to these threats? Why are the states in such a rush to allow trophy hunting of bears and	FWS-R6-ES-2016-0042-4878	

If there are fewer and fewer large grazing animals for the grizzlies to eat, as well as no white-bark pine nuts or trout, it will definitely adversely affect the grizzly population and its ability to grow.	1002	1003				Factor E	With less food sources for grizzlies, it is not a good idea to remove the Greater Yellowstone Ecosystem Population from the Federal List of Endangered and Threatened Wildlife. Also, even though the population is slowly growing, less than a thousand bears is not many animals. Also, the states of Wyoming, Idaho and Montana are not protecting their wild ruminant populations very well, and most are declining because of failure of the breeding age females to have viable young that survive to adulthood. A very high prevalence of newborns have developmental malformations/birth defects. Any state that allows over 50% of some wild animal populations to be born with birth defects without doing something to find and mitigate the cause can't be trusted to protect predators, especially grizzlies and wolves. They even claim the wolves and grizzlies kill so many ruminant young that it causes population declines in the wild ruminant populations rather than trying to do something about the real cause of the declining ruminant populations. This is being less than truthful. It is actually the birth defects that either kill the newborn ruminants outright or make them much more susceptible to being caught by predators that are causing the low recruitment rates. I have seen no mention of the birth defects and adverse health issues on the ruminant newborns in the discussions concerning delisting of the grizzly. Has the USFWS done anything to mitigate the birth defects? If there are fewer and fewer large grazing animals for the grizzlies to eat, as well as no white-bark pine nuts or trout, it will definitely adversely affect the grizzly population and its ability to grow. The state game departments have completely ignored studies concerning the birth defects on ruminants and have consistently ignored all reports of birth defects on birds, mammals and amphibians. The agriculture departments have ignored the birth defects and health issues on domestic livestock that kill thousands each year and again the wild predators often are blamed. Since so many animals, including wolves have similar birth defects, it is possible that grizzlies also do. You should make certain that the grizzly cubs are not being similarly affected before even considering delisting. Human newborns have the same or similar birth defects and these serious health issues are increasing each year, so there is no reason to just assume that grizzly cubs are not being affected. Grizzlies eat foliage, like ruminants and they eat fruit, tubulars and meat, just like humans. Have you addressed this issue at all before recommending delisting? I am adamantly opposed to delisting the grizzly anywhere until all issues that may affect the grizzly populations are addressed, especially the issue of high prevalences of developmental malformations on newborns. See the links to the studies below: 2002 study: <http://www.ncbi.nlm.nih.gov/pubmed/12602857>; 2011 study: doi:10.2461/wbp.2011.7.13 2015 study: <http://dx.doi.org/10.4172/2375-446X.1000132>; Thank you for your consideration of this comment.	FWS-R6-ES-2016-0042-4869	
When I asked about population numbers at the public meeting in Bozeman, MT on April 12, 2016, Servheen stated that flights for population counts could be grounded for weather or several other reasons. If there are not a consistent number of annual flights for population reporting at even intervals throughout the seasons, how can these population counts be relied upon as accurate and be trusted to effectively and adequately manage population numbers if there are holes in the data? Using flight visuals for population reporting is also unreliable in regard to determining the sex of a bear, because unless a female has cubs with her, females and males cannot be distinguished from one another in an airplane. I believe too much emphasis has been placed on population numbers, disregarding the importance of habitat and food sources						Factor E	Please see attachment. Attachments FWS comment	FWS-R6-ES-2016-0042-4891	
As a trained conservationist, with a background in field biology work, I am adamantly opposed to this proposal. I have followed the research around Yellowstone grizzlies since college and am well aware of the issues affecting the Great Yellowstone Grizzly Bear population. This population of bears are an island population - there are significant barriers to this population being able to connect with other populations of bears due to habitat fragmentation which leads to genetic isolation and genetic inbreeding. Given the grizzlies slow reproduction rate, loss of food sources like the white bark pine nuts, potential declining populations of cutthroat trout due to climate change, habitat losses outside of the park, I feel that this proposal is ill advised.	1001	1002	1003	1006		Factor E	As a trained conservationist, with a background in field biology work, I am adamantly opposed to this proposal. I have followed the research around Yellowstone grizzlies since college and am well aware of the issues affecting the Great Yellowstone Grizzly Bear population. This population of bears are an island population - there are significant barriers to this population being able to connect with other populations of bears due to habitat fragmentation which leads to genetic isolation and genetic inbreeding. Given the grizzlies slow reproduction rate, loss of food sources like the white bark pine nuts, potential declining populations of cutthroat trout due to climate change, habitat losses outside of the park, I feel that this proposal is ill advised.	FWS-R6-ES-2016-0042-4917	

With the reintroduction of wolves, the ungulate population in parts of the of the Park appear to be in decline - another food source loss will potentially cause bears to roam farther in search of food. The unknown and potential flora losses, which are a large part of the bears diet, due to climate change cannot be overlooked and could contribute to further expansion of territories outside the Park. As a keystone species, the grizzlies influence on helping protect other sensitive species, like wolverines and lynx (as well as other non-mega fauna), is significant and crucial to species diversity in the northern Rockies.	1006						Factor E	As a trained conservationist, with a background in field biology work, I am adamantly opposed to this proposal. I have followed the research around Yellowstone grizzlies since college and am well aware of the issues affecting the Great Yellowstone Grizzly Bear population. This population of bears are an island population - there are significant barriers to this population being able to connect with other populations of bears due to habitat fragmentation which leads to genetic isolation and genetic inbreeding. Given the grizzlies slow reproduction rate, loss of food sources like the white bark pine nuts, potential declining populations of cutthroat trout due to climate change, habitat losses outside of the park, I feel that this proposal is ill advised. With the reintroduction of wolves, the ungulate population in parts of the of the Park appear to be in decline - another food source loss will potentially cause bears to roam farther in search of food. The unknown and potential flora losses, which are a large part of the bears diet, due to climate change cannot be overlooked and could contribute to further expansion of territories outside the Park. As a keystone species, the grizzlies influence on helping protect other sensitive species, like wolverines and lynx (as well as other non-mega fauna), is significant and crucial to species diversity in the northern Rockies. I lived in western Montana for 6 years and did field biology work, which involved direct interaction with the public, as well as working in the private sector during the winter months. The shoot, shovel and shut up mentality is still very much alive there with some of the population, which would be all to eager to illegally hunt bears. And that is to say nothing about the state governments in the area which can be heavily influenced by the cattle and timber extraction industries. I do not doubt that hunting grizzlies will be a trophy sport if the state is able to regulate the bear populations just like Idaho wants to do with wolves and grizzlies - and that is unacceptable on every level. The FWS is supposed to protect species in need for their benefit, regardless of political influence. Has the FWS looked at all the encompassing issues surrounding the bears? What about potential long term affects to the population? I believe that this has not happened. Don't play to the pressure of the states of Montana, Idaho, or Wyoming as they have shown previous unacceptable management plans for other species - i.e wolves. Delisting grizzlies in the Greater Yellowstone Ecosystem will have negative repercussions to that species, and many more. Please take the ecological high ground, the long term vision, and don't cave to political pressure. My family visits Yellowstone as much asd possible and my children would like to see a wild grizzly bear. They are depending on your agency to make the right choice. Please - do not delisit the Yellowstone grizzly bear. Look at the science not the politics.	FWS-R6-ES-2016-0042-4917	
Given recent decreases in their food sources, and more bears wandering further in search of sustenance, I can anticipate that many of the bears in the Yellowstone system will wander at times outside of the park's boundaries. I have concern that any sport hunting which might be allowed by states after delisting (and which are already rumored to be in the works) would not only threaten the grizzly population, but could also increase the potential for conflict/threat between grizzlies and non-consumptive wildlife users, such as hikers/backpackers. If a bear were to survive or witness an encounter with a sport hunter, I worry that that bear would be more prone to perceive other humans as a threat, and therefore put people at greater risk as well.	1000						Factor E	I am writing to respectfully share my opposition to the proposal to delist grizzlies in the Greater Yellowstone Ecosystem. I submit my comments as someone who takes an annual back country trip to another grizzly habitat, Glacier National Park in Montana, and who over the years has developed a deep appreciation for grizzlies. I also have a deep appreciation for the fact that, while generally calm, when feeling that they/their young may be threatened, they can pose a life threatening danger to hikers/backpackers or others. Given recent decreases in their food sources, and more bears wandering further in search of sustenance, I can anticipate that many of the bears in the Yellowstone system will wander at times outside of the park's boundaries. I have concern that any sport hunting which might be allowed by states after delisting (and which are already rumored to be in the works) would not only threaten the grizzly population, but could also increase the potential for conflict/threat between grizzlies and non-consumptive wildlife users, such as hikers/backpackers. If a bear were to survive or witness an encounter with a sport hunter, I worry that that bear would be more prone to perceive other humans as a threat, and therefore put people at greater risk as well. I am also concerned given how slowly grizzly bears reproduce, and the inexact science with regards to counting their population. Last year in Florida's first black bear hunt, quotas were exceeded over the first weekend of the hunt. If quotas for a grizzly hunt were accidentally exceeded, the time to rebuild the population could be significant. And from my observation with the limited sport hunting allowed of wolves, both here in my home state of Minnesota, and out west, once sport hunting starts, the appetite for it increases- regardless of if animal population numbers "support" continued hunts or not. If the FWS allows for the hunting of grizzlies, I think we need to be prepared for there to be more pressure for grizzlies to be hunted, whether or not the science would support that as a possible alternative at any given time. I also want to note the recent meta-analysis of the impact of hunting keystone predators upon their ability to best perform their vital ecological functioning, and that the environmental detriment is not simply a function of the number of animals left on the landscape, but also of the ways their behaviors are influenced by being subject to hunts (Ripple, et al., Bioscience, 2009). In closing, I would like to add one additional matter. The USFWS says that it wants to work with Native American groups on this proposal. Over fifty native american groups have already shared that they are opposed to this delisting. Please listen to the voices of Native Americans, myriad scientists, and many many other Americans, and do not move forward with the delisting of grizzlies at this time. Thank you for your time and attention.	FWS-R6-ES-2016-0042-4930	
I am concerned that FWS is using 1998 as a baseline, as this is before the WBP epidemic. Grizzly numbers may have been rising and the ecosystem able to support a growing population in 1998, however the GYE now has many stressors that were not as prevalent as in 1998. Climate change, blister rust, and pine beetles have decimated WBP populations. In the previous proposal of the 2007 delisting of grizzlies, WBP was stated as one of four important food sources. FWS lost its appeal in the Ninth Circuit Court in 2011 because the Service was found to be arbitrary and capricious in its consideration of grizzlies' use of WBP. In the current proposal, FWS merely claims WBP is an important food source, and the research used to support this claim is not comprehensive in consideration to climate change and epidemics, making the argument once again arbitrary and capricious. The current rule glosses over and deemphasizes the role WBP has in a GYE grizzly's diet to serve as a base for delisting. The Service's research found grizzly bears' selection of WBP seeds has declined since 2000, coinciding with WBP population declines reaching epidemic proportions, but the agency fails to acknowledge the likely causal connection of stark and rapid declines of WBP populations being a limiting factor for grizzly bears using it as a food source. The proposal states one-third of grizzly bears do not have WBP in their home range, but does not elaborate to clarify if a lack of WBP is because WBP does not grow in those regions or if those populations have been decimated by beetles and blister rust, therefore removing that vital food source from the bear's diet. The studies conducted are vastly insufficient in duration to determine the effects of climate change, reduced viable habitat, dwindling food sources, and how these stressors affect grizzly populations. The FWS is hasty, unreasonable, and offers dubious scientific results as evidence in favor of delisting. The Service is also relying on the ability to emergency relist grizzlies if need be. More stability in habitat, food sources, and reproduction is necessary before delisting can occur, otherwise the emergency relisting will be swift and the population will suffer great losses. I cannot, and will not, support delisting when the effects of climate change, diminishing food sources, habitat viability, and a lack of transparency in regards to state plans leaves so much to speculation.							Factor E	Please see attachment. Attachments FWS comment	FWS-R6-ES-2016-0042-4891	

According to Mr. Doug Peacock, an expert on the Greater Yellowstone Grizzly Bears, evidence indicates that the Grizzly population is already being impacted by climate change in so much as reducing one of its major food sources, e.g. the Whitebark Pine tree to near extinction in the last 10 years. It remains to be seen the overall effect, but at one time, the nuts from the Whitebark Pine, a species of pine that grew abundantly at higher elevations, provided an especially valuable food source for mother bears with the added advantage that vulnerable mother bears and their young tended to stay at these higher, more remote and therefore safer locations, where the trees grew. Due to the near extinction of the Whitebark Pine, the safety that accompanied this food source no longer exists.	1006	1002				Factor E	I am very concerned about the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. According to Mr. Doug Peacock, an expert on the Greater Yellowstone Grizzly Bears, evidence indicates that the Grizzly population is already being impacted by climate change in so much as reducing one of its major food sources, e.g. the Whitebark Pine tree to near extinction in the last 10 years. It remains to be seen the overall effect, but at one time, the nuts from the Whitebark Pine, a species of pine that grew abundantly at higher elevations, provided an especially valuable food source for mother bears with the added advantage that vulnerable mother bears and their young tended to stay at these higher, more remote and therefore safer locations, where the trees grew. Due to the near extinction of the Whitebark Pine, the safety that accompanied this food source no longer exists. Additionally, the Grizzly population is likely to suffer severe reductions in their population if the proposed removal from the Federal List of Endangered and Threatened Wildlife is approved due to trophy hunts in Wyoming, Montana, and Idaho. I understand from available information that these trophy hunts are likely to begin within one year of "removal". If sport hunting and other causes of mortality exceed the number of cubs born each year, the Grizzly's numbers could be reduced within a very short amount of time. I believe strongly in the protection afforded the Greater Yellowstone Grizzly Bears under the Endangered Species Act as the best means to ensure that this population of bears will continue to roam the forests and mountains of the Greater Yellowstone Ecosystem for years to come. I respectfully request that FWS halt the process of removal and begin a thorough study of the effects of climate change on the Grizzly Bear in the present as well as in the future prior to making its decision.	FWS-R6-ES-2016-0042-5486	
The delisting of GYE grizzly bears now, during increasing Climate Change uncertainty and scientifically accepted understanding of changing or reduced grizzly bear habitats including food, water and shelter resources would absolutely reduce the GYE grizzly bear population (likely other lower 48 grizzly bears and their populations too), and their conservation efforts and funding, which would definitely and significantly compromise the viability of these GYE grizzly bears in both the short-term, and the long-term for America's Future generations.	1006					Factor E	As a wildlife biologist, I have worked with several USFWS Threatened and Endangered Species over the past 30 years, with several federal land management agencies. I absolutely disagree with the USFWS' totally premature and significantly and inadequately designed and planned proposal to delist the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Threatened Species Protections of the Endangered Species Act which the grizzly bears have been under for the last 40 years for these several important reasons. 1. While the numbers of grizzly bears in GYE are up since the low in the late 1970s and early 1980s, this has taken more than three decades of significant and serious legally established protections and considerable conservation efforts on many different levels. The delisting of GYE grizzly bears now, during increasing Climate Change uncertainty and scientifically accepted understanding of changing or reduced grizzly bear habitats including food, water and shelter resources would absolutely reduce the GYE grizzly bear population (likely other lower 48 grizzly bears and their populations too), and their conservation efforts and funding, which would definitely and significantly compromise the viability of these GYE grizzly bears in both the short-term, and the long-term for America's Future generations. All the important and comprehensive grizzly bear conservation measures must be established and in place before delisting proposal is considered, including all the funding, ecological, scientific, social, and economic issues and concerns. Unfortunately, none of these important conservation measures, issues, and concerns are adequately addressed yet, so this grizzly delisting proposal must not continue. 2. Unfortunately, after delisting, the likely legal hunting of grizzly bears in the states of ID, MT, and WY, would NOT be responsible or reasonable for the GYE grizzly bear population to continue to be healthy and viable. Also, unfortunately, the illegal killing of grizzly bears would significantly rise, especially with little or no funding, efforts or motivation to prosecute violations of important wildlife regulations. I am absolutely against any legal hunting of grizzly bears in the lower 48 contiguous United States for many responsible reasons, and especially for the hunting of grizzly bears would definitely be damaging to grizzly bear conservation and the GYE grizzly bear population would be significantly reduced. Any consideration or allowance of legal grizzly bear hunting in any state at anytime in the future must absolutely be denied before proposal is reasonable, responsible, or expectable. 3. Absolutely, important comprehensive Grizzly Bear Habitats on federal, state and local lands in all the appropriate NW States must be established and well coordinated first, before any delisting proposal should be considered. Seriously, grizzly bear habitats and their continued management, preservation and conservation for grizzly bears in the states of ID, MT, and WY on federally managed public lands and national forests have NOT been well coordinated, adequate, legally binding, or secured before this delisting proposal was made. Therefore, this proposal should be stopped immediately. 4. The Endangered Species Act requires tribal nations consultation and cooperation which the USFWS has NOT properly handled, managed, or considered. 5. To establish the GYE grizzly bear population as a distinct population segment is definitely and absolutely the most scientifically, ecologically, and socially responsible way to continue conservation and protection of a healthy functioning viable grizzly bear population in the GYE.	FWS-R6-ES-2016-0042-5460	
The delisting proposal is based on recovery goals for the GYE population that do not consider the necessary reconnection of the GYE population with the NCDE population to the north. Without establishing this connection before delisting, critical opportunities to ensure the long-term genetic health of the species will be lost.	1001					Factor E	I am writing to strongly oppose the delisting of the Greater Yellowstone Ecosystem population of grizzly bear (<i>Ursus arctos horribilis</i>) under the Endangered Species Act (ESA). The delisting proposal is based on recovery goals for the GYE population that do not consider the necessary reconnection of the GYE population with the NCDE population to the north. Without establishing this connection before delisting, critical opportunities to ensure the long-term genetic health of the species will be lost. By the Service's own admission "Grizzly bears are currently found approximately halfway between the NCDE and GYE areas and it is likely that these populations will connect in the near future through natural dispersal and movements." (https://www.fws.gov/mountain-prairie/es/GYE%20Grizzly-FAQs.pdf) However, the habitat connectivity required to allow for continued levels of gene flow that would allow these subpopulations to function as a metapopulation will require continued federal coordination to achieve, and without the ESA listing, strong protections will not be in place for dispersing bears outside the PCA. Designating the GYE population as a DPS, while it may be technically acceptable according to the Service's policy, is short-sighted with respect to the current status of the GYE and NCDE populations, and the central importance of future connectivity between them. Shafer (2015) stated "Although heroic efforts have been underway to facilitate corridor creation, the opportunity to allow for a more permeable landscape so the GYE grizzly bear population can disperse to the NCDE or the Bitterroot-Selway-Frank Church River of No Return wilderness complex, or vice versa, will not last indefinitely." It is not enough that." Approaches for increasing the likelihood of natural movement of grizzly bears and genetic interchange between the GYE and the NCDE populations, have been outlined in the Conservation Strategy." The Service needs to stay the course and continue to protect the GYE population (and most critically, dispersing bears from both populations) under the ESA until they can be reconnected.	FWS-R6-ES-2016-0042-5488	

I believe strongly in the protection afforded the Greater Yellowstone Grizzly Bears under the Endangered Species Act as the best means to ensure that this population of bears will continue to roam the forests and mountains of the Greater Yellowstone Ecosystem for years to come. I respectfully request that FWS halt the process of removal and begin a thorough study of the effects of climate change on the Grizzly Bear in the present as well as in the future prior to making its decision.	1006					Factor E	I am very concerned about the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. According to Mr. Doug Peacock, an expert on the Greater Yellowstone Grizzly Bears, evidence indicates that the Grizzly population is already being impacted by climate change in so much as reducing one of its major food sources, e.g. the Whitebark Pine tree to near extinction in the last 10 years. It remains to be seen the overall effect, but at one time, the nuts from the Whitebark Pine, a species of pine that grew abundantly at higher elevations, provided an especially valuable food source for mother bears with the added advantage that vulnerable mother bears and their young tended to stay at these higher, more remote and therefore safer locations, where the trees grew. Due to the near extinction of the Whitebark Pine, the safety that accompanied this food source no longer exists. Additionally, the Grizzly population is likely to suffer severe reductions in their population if the proposed removal from the Federal List of Endangered and Threatened Wildlife is approved due to trophy hunts in Wyoming, Montana, and Idaho. I understand from available information that these trophy hunts are likely to begin within one year of "removal". If sport hunting and other causes of mortality exceed the number of cubs born each year, the Grizzly's numbers could be reduced within a very short amount of time. I believe strongly in the protection afforded the Greater Yellowstone Grizzly Bears under the Endangered Species Act as the best means to ensure that this population of bears will continue to roam the forests and mountains of the Greater Yellowstone Ecosystem for years to come. I respectfully request that FWS halt the process of removal and begin a thorough study of the effects of climate change on the Grizzly Bear in the present as well as in the future prior to making its decision.	FWS-R6-ES-2016-0042-5486	
FWS has not taken into account the effects of climate change on the grizzly's food sources and habitat. Grizzlies can adapt to changing food sources and availability, but FWS has failed to provide conclusive research to show that the bears can adapt quickly enough to keep up with the increased rate of change. Specifically, the diminished habitat for the army cutworm moth, threatened cutthroat trout populations, and the decimation of the white bark pine due to blister rust and pine beetles. The research /data that has been presented is insufficient in duration.	1006	1002	1003	1004		Factor E	I am very concerned about the FWS proposal to delist the grizzly bear. I do not feel that FWS has provided adequate information for an educated decision on the delisting. Jackson WY was an obvious location for a public hearing. I am very curious as to why FWS did not allow the citizens located in the middle of grizzly bear country to have a forum for discussion on such an important topic. A 60 day comment period is just too short of a timeframe to gather a comprehensive look at public opinion. By disregarding obvious locations and limiting input time, FWS seems to be trying to skew the decision in their favor. Another issue is the fact that Montana and Idaho have not published their state management plans. Where are they? Is anyone working on them? As a Montana resident it is essential for me to know and understand the plan before I can form an educated opinion on delisting the grizzly. FWS has not taken into account the effects of climate change on the grizzly's food sources and habitat. Grizzlies can adapt to changing food sources and availability, but FWS has failed to provide conclusive research to show that the bears can adapt quickly enough to keep up with the increased rate of change. Specifically, the diminished habitat for the army cutworm moth, threatened cutthroat trout populations, and the decimation of the white bark pine due to blister rust and pine beetles. The research /data that has been presented is insufficient in duration. Before delisting can be considered, comprehensive studies over a longer period of time will need to be carried out. More time will give biologists and the public correct information on food source sustainability. Other data presented by FWS said that bison were not a significant source of food. Research was done in the Yellowstone Lake area where there are few bison, but what about Lamar Valley where bison are plentiful? Once again this data is skewed and insufficient. FWS reasons for delisting lacks plausibility because of the lack of research carried out over a sufficient amount of time and data on too small of a population to be generalized. I will not support delisting when FWS has not taken climate change, diminished food supply, and threatened habitat fully into account. Lack of published state plans, a short comment period, and poor public hearing site choices makes me wonder if FWS is bowing to political pressure to push the delisting through for specific interest groups. The grizzly bears should be allowed to thrive, not just maintain an existence.	FWS-R6-ES-2016-0042-5552	
I will not support delisting when FWS has not taken climate change, diminished food supply, and threatened habitat fully into account. Lack of published state plans, a short comment period, and poor public hearing site choices makes me wonder if FWS is bowing to political pressure to push the delisting through for specific interest groups.	1006	1000	1008			Factor E	I am very concerned about the FWS proposal to delist the grizzly bear. I do not feel that FWS has provided adequate information for an educated decision on the delisting. Jackson WY was an obvious location for a public hearing. I am very curious as to why FWS did not allow the citizens located in the middle of grizzly bear country to have a forum for discussion on such an important topic. A 60 day comment period is just too short of a timeframe to gather a comprehensive look at public opinion. By disregarding obvious locations and limiting input time, FWS seems to be trying to skew the decision in their favor. Another issue is the fact that Montana and Idaho have not published their state management plans. Where are they? Is anyone working on them? As a Montana resident it is essential for me to know and understand the plan before I can form an educated opinion on delisting the grizzly. FWS has not taken into account the effects of climate change on the grizzly's food sources and habitat. Grizzlies can adapt to changing food sources and availability, but FWS has failed to provide conclusive research to show that the bears can adapt quickly enough to keep up with the increased rate of change. Specifically, the diminished habitat for the army cutworm moth, threatened cutthroat trout populations, and the decimation of the white bark pine due to blister rust and pine beetles. The research /data that has been presented is insufficient in duration. Before delisting can be considered, comprehensive studies over a longer period of time will need to be carried out. More time will give biologists and the public correct information on food source sustainability. Other data presented by FWS said that bison were not a significant source of food. Research was done in the Yellowstone Lake area where there are few bison, but what about Lamar Valley where bison are plentiful? Once again this data is skewed and insufficient. FWS reasons for delisting lacks plausibility because of the lack of research carried out over a sufficient amount of time and data on too small of a population to be generalized. I will not support delisting when FWS has not taken climate change, diminished food supply, and threatened habitat fully into account. Lack of published state plans, a short comment period, and poor public hearing site choices makes me wonder if FWS is bowing to political pressure to push the delisting through for specific interest groups. The grizzly bears should be allowed to thrive, not just maintain an existence.	FWS-R6-ES-2016-0042-5552	

They are not fully recovered. They remain an isolated population vulnerable to genetic inbreeding. Not enough has been done to connect and protect habitat. Their population in the American West is a small fraction compared to what it was before European colonization.	1001						Factor E	Do not remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. They are not fully recovered. They remain an isolated population vulnerable to genetic inbreeding. Not enough has been done to connect and protect habitat. Their population in the American West is a small fraction compared to what it was before European colonization. Historical food sources such as white bark pine and cut-throat trout are failing. We are unsure what other impacts climate change and human population pressure (human caused mortality is the single largest contributor to grizzly bear deaths) will make on grizzly bear food sources and habitat security. In light of that uncertainty we must proceed with caution. The state of Montana should not be entrusted with the management of grizzly bears recovered from the brink of extinction in the lower 48 states using federal tax dollars. Grizzly bears are a federal treasure and should not be subject to Montana hunting under the aegis of an agency funded largely by licenses to kill wildlife they are "managing". Once delisted there will be a gleeful shooting gallery effect much like what the wolf is currently facing. Ethical hunting is for putting food on the table. You don't eat carnivores. Trophy hunting will prevail, attracting the worst common denominator among hunters, polluting and devaluing the conservative western tradition of eating what you kill. Hunting bears in the fall as they prepare to hibernate will disrupt their energy gathering efforts. Hunting also can indirectly affect age and sex structure and the social organization of a population of bears. Grizzly bears are our neighbors. They share the planet with us. They deserve to exist unrelated to human comfort and convenience. They have intrinsic value simply because they are. A community is a place and all its creatures, including grizzly bears. Grizzly bears are an important "umbrella" species. As the grizzly bear goes so goes the rest of the biodiversity of an ecosystem. It's all connected.	FWS-R6-ES-2016-0042-5578	
Historical food sources such as white bark pine and cut-throat trout are failing. We are unsure what other impacts climate change and human population pressure (human caused mortality is the single largest contributor to grizzly bear deaths) will make on grizzly bear food sources and habitat security. In light of that uncertainty we must proceed with caution.	1002	1003	1006				Factor E	Do not remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. They are not fully recovered. They remain an isolated population vulnerable to genetic inbreeding. Not enough has been done to connect and protect habitat. Their population in the American West is a small fraction compared to what it was before European colonization. Historical food sources such as white bark pine and cut-throat trout are failing. We are unsure what other impacts climate change and human population pressure (human caused mortality is the single largest contributor to grizzly bear deaths) will make on grizzly bear food sources and habitat security. In light of that uncertainty we must proceed with caution. The state of Montana should not be entrusted with the management of grizzly bears recovered from the brink of extinction in the lower 48 states using federal tax dollars. Grizzly bears are a federal treasure and should not be subject to Montana hunting under the aegis of an agency funded largely by licenses to kill wildlife they are "managing". Once delisted there will be a gleeful shooting gallery effect much like what the wolf is currently facing. Ethical hunting is for putting food on the table. You don't eat carnivores. Trophy hunting will prevail, attracting the worst common denominator among hunters, polluting and devaluing the conservative western tradition of eating what you kill. Hunting bears in the fall as they prepare to hibernate will disrupt their energy gathering efforts. Hunting also can indirectly affect age and sex structure and the social organization of a population of bears. Grizzly bears are our neighbors. They share the planet with us. They deserve to exist unrelated to human comfort and convenience. They have intrinsic value simply because they are. A community is a place and all its creatures, including grizzly bears. Grizzly bears are an important "umbrella" species. As the grizzly bear goes so goes the rest of the biodiversity of an ecosystem. It's all connected.	FWS-R6-ES-2016-0042-5578	
Evidence indicates that the grizzly is already being impacted by climate change with the near extinction of the whitebark pine in the last ten years due to warming temperatures. From what I have read, nuts from the whitebark pine provided an especially valuable food source for mother bears with the added advantage that those vulnerable bears and their young tended to stay at higher, more remote (safer) locations, where the trees grew.	1006	1002					Factor E	I am very concerned about the proposed delisting of the Yellowstone grizzly bear. Evidence indicates that the grizzly is already being impacted by climate change with the near extinction of the whitebark pine in the last ten years due to warming temperatures. From what I have read, nuts from the whitebark pine provided an especially valuable food source for mother bears with the added advantage that those vulnerable bears and their young tended to stay at higher, more remote (safer) locations, where the trees grew. Also of concern are the proposed trophy hunts in Wyoming, Montana, and Idaho that are likely to begin within a year of delisting. If sport hunting and other causes of mortality begin to exceed the number of cubs born in a year, the grizzly's numbers could begin to decrease within a very short time. I believe that protection under the Endangered Species Act is the best hope we have to ensure that these great bears will continue to roam the forests and mountains of the Greater Yellowstone Ecosystem for years to come. I ask that FWS halt the delisting and take a closer look at how climate change is impacting the grizzly today and how it is likely to impact them in the future before making any final decision. Thank you for your consideration.	FWS-R6-ES-2016-0042-5605	

Increased logging, vegetation clearing, new and out of control insect pests associated with climate change and climate change itself have already placed it under fire. We should be working desperately to hang on to these iconic species that, were they to disappear would leave us incredibly diminished and not planning their demise.	1006					Factor E	As a botanist and a long time observer of healthy ecosystems I would like to comment against the de-listing of the grizzly bear. Main concerns of mine are, first of all, the hunting spree that this de-listing will unleash. The bear is already under severe threats because of the dwindling food resources, and reduced habitat. Increased logging, vegetation clearing, new and out of control insect pests associated with climate change and climate change itself have already placed it under fire. We should be working desperately to hang on to these iconic species that, were they to disappear would leave us incredibly diminished and not planning their demise. Another huge concern is the invasion of wilderness lands by hunters set on finding these bears. Very little much is known about the genetics or reduced fitness since listing. Little is known about the necessary density for successful long term recovery. Nothing appears to me more ill conceived that this de-listing which would put a blanket of death over the bear. It would make more sense to allow a hunt or two in particular areas that could be well-studied to evaluate the consequences. When other species have been delisted - to the exception of the wolf, another sad case - the protected species have been allowed to flourish and benefit from the protections long term. Only if and when we would have enough grizzly bears that would exceed the carrying capacity of certain areas would partial de-listing make sense. Large predators like the grizzly make good sense for ecosystems. Science is clear about this. And large predators like the grizzly prevent other damages to vegetation and ecosystems by keeping tabs on other species. I urge you not to allow the de-listing. We need our top beautiful grizzly bear to continue to recover protected by the ESA. Thank you very much for allowing me to comment.	FWS-R6-ES-2016-0042-5637	
With today's global changes - drier climate means less available overall forage (not just Whitemark pine nuts) for the Grizzly Bear. This in turn will lead to more seasonal human/bear conflict and more removal of bears from the Greater Yellowstone Ecosystem. All of these reasons stated - leads to the simple fact that Grizzly Bears can not rebound once their habitat is fragmented, human conflict increases and food sources overall, are changing. Even though reaching a larger population of bears in the ecosystem is a sign of success and cause for delisting, we must look at the bigger picture and understand that Grizzly Bears are a scientifically proven species that has a low mortality rate and negatively affected by changes in its habitat.	1006	1000				Factor E	I am an authorized and licensed guide working inside Yellowstone National Park. I am a resident of Gardiner, Montana which is a gateway community to Yellowstone's Northern Border. As the owner of my guiding service, my income and livelihood rely on the fact that people want to visit the natural beauty that is found inside our world's first national park. Yellowstone is a one-of-a-kind place where wildness still exists in the Lower 48. Bound by public lands and no serious development, allows the wildness to thrive. Without the existing USFS lands (forest and designated wilderness) that surround the park, Yellowstone National Park would not have the diversity within its biological communities that it has today. Gardiner sits in a small valley that is surrounded by public lands. I grew up in the west gaining a respect for the open spaces that I had around me and I am now able to instill that similar respect to my 4 year old daughter today, because of the wildness that surrounds us. We can walk up the hill behind our house and easily find tracks of grizzly and black bears, wolves, coyote, cougar, elk, bison, mule and whitetail deer and the occasional moose. We have all the amazing diversity of creatures, literally out our back door and my daughter can experience this wildness and be in touch with it. In today's society - that is a honest to goodness VERY special thing! If Grizzly Bears were to be removed from the Endangered and Threatened species list - not just the few that would be legally hunted would perish each year on lands surrounding Yellowstone. It would become more easy to fragment the habitat through mining, timber sales, recreation, etc if the land was not inhabited by a species of concern. Humans could "accidentally" shoot a Grizzly bear and call it self defense, without the ramifications of being persecuted which would happen if you shot and killed a species of concern. Humans could be more carefree about shooting guns towards a bear, rather than using pepper spray, which could lead to an increase with injured bears that could become more dangerous to another human that it might encounter next. With today's global changes - drier climate means less available overall forage (not just Whitemark pine nuts) for the Grizzly Bear. This in turn will lead to more seasonal human/bear conflict and more removal of bears from the Greater Yellowstone Ecosystem. All of these reasons stated - leads to the simple fact that Grizzly Bears can not rebound once their habitat is fragmented, human conflict increases and food sources overall, are changing. Even though reaching a larger population of bears in the ecosystem is a sign of success and cause for delisting, we must look at the bigger picture and understand that Grizzly Bears are a scientifically proven species that has a low mortality rate and negatively affected by changes in its habitat. This very serious decision of delisting is coincided with the fact that we are reviewing opening sections of the Gallatin Mountain Range for more motorized access, rather than restricting it. This land in question is the bordering land to Yellowstone National Park's north and a well known travel corridor for Grizzly Bears (not to mention countless other species). Delisting Grizzly Bears is a wrong decision and for the betterment of the world and all the natural spaces left in the Lower 48 - Yellowstone's Ecosystem needs protection that stretches beyond the invisible line of the National Park boundary. For the betterment of our children, wildness must remain wild. Hunting of Grizzly Bears is wrong and unnecessary. Trophy hunting a predator should not take	FWS-R6-ES-2016-0042-5606	
Another huge concern is the invasion of wilderness lands by hunters set on finding these bears. Very little much is known about the genetics or reduced fitness since listing. Little is known about the necessary density for successful long term recovery.	1001					Factor E	As a botanist and a long time observer of healthy ecosystems I would like to comment against the de-listing of the grizzly bear. Main concerns of mine are, first of all, the hunting spree that this de-listing will unleash. The bear is already under severe threats because of the dwindling food resources, and reduced habitat. Increased logging, vegetation clearing, new and out of control insect pests associated with climate change and climate change itself have already placed it under fire. We should be working desperately to hang on to these iconic species that, were they to disappear would leave us incredibly diminished and not planning their demise. Another huge concern is the invasion of wilderness lands by hunters set on finding these bears. Very little much is known about the genetics or reduced fitness since listing. Little is known about the necessary density for successful long term recovery. Nothing appears to me more ill conceived that this de-listing which would put a blanket of death over the bear. It would make more sense to allow a hunt or two in particular areas that could be well-studied to evaluate the consequences. When other species have been delisted - to the exception of the wolf, another sad case - the protected species have been allowed to flourish and benefit from the protections long term. Only if and when we would have enough grizzly bears that would exceed the carrying capacity of certain areas would partial de-listing make sense. Large predators like the grizzly make good sense for ecosystems. Science is clear about this. And large predators like the grizzly prevent other damages to vegetation and ecosystems by keeping tabs on other species. I urge you not to allow the de-listing. We need our top beautiful grizzly bear to continue to recover protected by the ESA. Thank you very much for allowing me to comment.	FWS-R6-ES-2016-0042-5637	

The issue of climate change as it relates to the loss of the bear's food sources must also be addressed. U.S. Fish and Wildlife Service has claimed that it's OK to delist the Grizzly now, even though it has lost 2 of their 4 major food sources because of climate change and invasive species. Warming temperatures are expected to remove the summer alpine haunts of one of the other remaining key foods: army cutworm moths.	1006	1000	1004				Factor E	To Secretary of the Interior Ms. Sally Jewell, I am writing to you about the issue of the U.S. Fish and Game Department's decision to remove the Yellowstone Grizzly Bear aka Brown Bear off the Federal Endangered Species Protection list. This is a complex issue as are the consequences of this amazing animal losing their endangered protection. The final answer as to why the Yellowstone Grizzly should not be removed is clearly because the species is not recovered. Instead of delisting, with all the time, money, and effort spent to bring back the bear from extinction, more money and time needs to be spent educating the growing human population on living in bear territory. Currently, the #1 cause of bear mortality still stems from conflicts with people. A secondary unforeseen problem that has reared its ugly head in recent years is the misinformation campaign of certain US agencies as well as one sided mainstream media stories. For example, government agencies and U.S. newspaper articles have claimed that the Yellowstone Bear population has increased and even doubled since the last time the US Fish and Game tried to remove the bear in 2006. In dissent of this opinion, a recent annual report compiled by Dr. David Mattson from the Interagency Grizzly Bear Study Team concludes that the Yellowstone Grizzly population has not only not grown since 2002, it has actually declined since 2007. This effort to misinform the public is both disturbing and problematic because the American people are not getting the truth. Let it be known that I wish to only focus on a few important points in this letter as opposed to the many reasons as to why delisting the Yellowstone Bear is the wrong move at this time. Female bears if healthy only have litters about every 3 years and do not reproduce easily. The Yellowstone Bear population has been isolated for over 100 years and some evidence suggests that the population is suffering from the effects of inbreeding. The Brown Bear currently occupies about 1% of their historic range prior to Europeans settling the United States. While there is available habitat suitable for Brown Bears that could be used to connect the few remaining populations in the lower 48 states, the current plan calls for flying or driving male brown bears to Yellowstone in order to mate and improve their genetic diversity. Again, this is a wrong-headed move unless given no other choice to sustain a healthy population. Currently, ranchers and farmers are compensated for the loss of domesticated animals by Yellowstone Bears. While some ranchers are working out their differences peaceably with grizzly bears, others are not. For that reason, federal oversight is still necessary. The issue of climate change as it relates to the loss of the bear's food sources must also be addressed. U.S. Fish and Wildlife Service has claimed that it's OK to delist the Grizzly now, even though it has lost 2 of their 4 major food sources because of climate change and invasive species. Warming temperatures are expected to remove the summer alpine haunts of one of the other remaining key foods: army cutworm moths. In the face of an unraveling ecosystem, bears have been turning to the dangerous practice of eating more meat. Unsustainable numbers of bears are being killed as result of conflicts with incautious big game hunters and ranchers. More needs to be done to reduce conflicts, not less. Lastly, another consequence of delisting the brown bear is that they will once again be hunted. ~~States surrounding Yellowstone have already announced the bear will lose again be hunted. Hunter the bear is needed what saved~~	FWS-R6-ES-2016-0042-0008	
The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies.	1006	1000					Factor E	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	
I don't agree with the proposed delisting. Although some may say the numbers have increased,the estimated 700 grizzlies is still a very small number especially with possible interbreeding causing genetic health problems. The grizzly should stay on the endangered list and monitored closely.	1001						Factor E	I don't agree with the proposed delisting. Although some may say the numbers have increased,the estimated 700 grizzlies is still a very small number especially with possible interbreeding causing genetic health problems. The grizzly should stay on the endangered list and monitored closely.	FWS-R6-ES-2016-0042-0295	

Grizzly bears are already dying in record numbers. In 2015 alone, a record 59 grizzlies were known to have died in the ecosystem, the vast majority of which were human caused (killed by hunters, "management removals" etc). What is even more concerning is that 2015 is by no means an outlier year. Known and probable mortalities have exceeded 50 bears for 3 out of the last 6 years, often violating the government's own mortality limits. This increased mortality is often spun by USFWS as the natural result of more bears in the population. The problem with this is that the grizzly population has not increased substantially since the early 2000's, according to their own data. However, this increased level of mortality is directly correlative to the decline in whitebark pine trees and cutthroat trout.	1002	1003					Factor E	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	
Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger.The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends.	1001	1006					Factor E	Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends.	FWS-R6-ES-2016-0042-0334	
And with climate change happening, you haven't given them a fair chance.	1006						Factor E	I am against the delisting of grizzly bears. Grizzlies are the slowest reproducing mammal in the world. 40 years and millions of dollars were spent to recover them from a little over hundred to just over 700. That took 40 YEARS!! Why so quick to delist? What is the point of recovery if you turn around and kill without letting the effects of recovery sink in for 10 years or so? And with climate change happening, you haven't given them a fair chance. Predators are essential in the circle of life....you take them away and the ecosystem crumbles downward. Hunting predators is counterproductive and foolish. I am strongly against the delisting. This decision is wrong and does not listen follow what science says. Keep Grizzly Bears Listed!! Thank you	FWS-R6-ES-2016-0042-0336	

As soon as their Endangered Species protection is removed, I fear that these iconic bears will be hunted mercilessly for their coats, paws, a noble head to mount on a hunter's wall or the animal's entire carcass to be preserved/taxidermy and displayed at a hunting lodge for bragging rights. Meanwhile, in the forest, orphaned cubs will die of starvation or, not having finished learning the lessons of how to be a "good bear" in a national park from its mother--i.e., which animals are food (elk, deer, vermin, berries, etc) and which are threat (humans), will become a danger to people and, ultimately, themselves. Left to their own devices, Grizzly bears typically prefer to avoid dangerous encounters with any rival predator. If humans become their #1 enemy again, be sure that their natural prey will suffer, too: overpopulation, explosion of disease that the predators would have controlled, and compromise in the genetic strength of the herds. When the Grizzly is no longer around to fell the weaker members of the species, any animal will have a greater chance of breeding, not just the strongest and fittest members.						Factor E	Grizzly bears are an important species, and their species population has not rebounded so much that they can long survive being removed from the list of Endangered and Threatened Wildlife. Just a couple weeks ago, I submitted a comment to protest the slaughter of Yellowstone Bison. Apparently, the Forest Service thought it was necessary to cull the species population to prevent the spread of a bovine virus that could infect domestic cattle grazing nearby. If there was truly a "healthy" size/population of Grizzly bears in the park, that cull would not have been needed. These and other apex predators (such as wolves, cougars, etc.) naturally hunt weakened prey animals such as the sick/infected bison. The bears help to maintain a healthy population balance between predator and prey species. As soon as their Endangered Species protection is removed, I fear that these iconic bears will be hunted mercilessly for their coats, paws, a noble head to mount on a hunter's wall or the animal's entire carcass to be preserved/taxidermy and displayed at a hunting lodge for bragging rights. Meanwhile, in the forest, orphaned cubs will die of starvation or, not having finished learning the lessons of how to be a "good bear" in a national park from its mother--i.e., which animals are food (elk, deer, vermin, berries, etc) and which are threat (humans), will become a danger to people and, ultimately, themselves. Left to their own devices, Grizzly bears typically prefer to avoid dangerous encounters with any rival predator. If humans become their #1 enemy again, be sure that their natural prey will suffer, too: overpopulation, explosion of disease that the predators would have controlled, and compromise in the genetic strength of the herds. When the Grizzly is no longer around to fell the weaker members of the species, any animal will have a greater chance of breeding, not just the strongest and fittest members. Please, please re-think your proposal to remove the protected status of these bears.	FWS-R6-ES-2016-0042-0349	
The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends.	1006					Factor E	The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range This is being considered for the benefit of trophy hunters and is not based on the science above or any consideration for the safety of the grizzly population. I implore you to consider not hunting them because of the reasons listed above and many more.	FWS-R6-ES-2016-0042-0387	

Trigger Text	Code(s)	Full Comment Text	Form Letter/Document ID	Annotation Note
Healthy ecosystems NEED large predators to keep prey species in check to prevent: overpopulation, over grazing, soil erosion, widespread disease and starvation . - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem	Miscellaneous	Healthy ecosystems NEED large predators to keep prey species in check to prevent: overpopulation, over grazing, soil erosion, widespread disease and starvation. - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - Sincerely,	CBD	
Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population	Miscellaneous	I am writing to urge you to maintain federal ESA listing for grizzly bears in the Greater Yellowstone Ecosystem (GYE) -- a high-profile population that we as a nation have invested in since 1975. The FWS estimates a GYE grizzly population of about 700 animals, but this is the census size (N). The science of conservation genetics (in which I have some expertise) tell us that the most important number is not N, but rather the "effective population size" (Ne) - basically the number of individuals that successfully reproduce each generation. Depending on the sex ratio and age structure of sexually mature individuals, the number of breeding adults will be LOWER to FAR LOWER than the census size, and in terms of genetic health and long-term viability of a population, THIS IS WHAT COUNTS. (We have learned this the hard way with the Florida Cougar!). Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. - - Despite positive demographic trends since ESA listing of the GYE grizzlies, this population remains severely isolated, which will jeopardize the long-term viability of this population until some connectivity can be established with other populations. Without some assurance that surrounding states can protect bears that attempt to disperse, should ESA restrictions be lifted, this listing should be maintained. Artificially moving GYE bears to other populations (Northern Rockies) and vice-versa may be necessary in the short term, but this amounts to "ecologically baby-sitting" and is not a long term strategy. Corridors must be developed and then maintained long enough to document successful dispersal and reproduction by bears into and out of the GYE, and then delisting would be justified. I hope you will reconsider the delisting proposal and keep the GYE bears protected until they can become part of a larger meta-population group. - - Sincerely,	CBD	
Please note that Grizzlies help contain overpopulation of other species	Miscellaneous	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. Please note that Grizzlies help contain overpopulation of other species. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - Sincerely,	CBD	
Corridors for travel are essential and the animals must be safe to move .	Miscellaneous	I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. Corridors for travel are essential and the animals must be safe to move. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - Sincerely,	CBD	
Colorado and Idaho have great habitat and no bears. Reintroduction plans into these areas are not in existence as far as I can tell.	Miscellaneous	- Hello, - - A proposal delist grizzly bears has long concerned me. Years ago when this talk started it was premature. Now with declining food sources and climate change it is still premature. Millions of acres of habitat is unoccupied. Look on Cali	CBD	
"Problem" bears are still handled on a case by case basis and economically, their value as a draw to the National Parks (Yellowstone and Teton) where they reside is estimated to be greater than \$10,000,000 per year. Any income gained by delisting and issuing hunting permits would be short lived and modest to nonexistent in comparison. The argument that trophy hunting will be economically important to saving the grizzly is arcane and outdated. One should also factor in the sentiments not only of our nation, but that of people from around the globe, many whom travel to the US annually for the chance of glimpsing one of these iconic bears.	Miscellaneous	Dear Director Ashe, I am writing today to express my concern over the proposed plan to delist the Grizzly Bear from the Endangered Species Act. Many have stated on social media and in articles concerning the subject that appealing to your office and the state governments of Idaho, Montana and Wyoming is a waste of time. As far as I am concerned, you are still part of the US Government and, as such, for the people. Therefore, I am confident that you will treat the concerns of all constituents with thoughtful consideration in this and all matters related to your work. My vote would be to keep the Grizzly Bear under the protection of the Endangered Species Act. Yes, grizzly numbers in the Greater Yellowstone Ecosystem have grown from a low near 150 before listing, to over 700. Seven Hundred.....not a large number by any means. Couple that with the facts that they are very slow to reproduce, have at best a 50% chance of making it to breeding age and their primary food sources are being devastated by climate change make this rebound in numbers tenuous at best. If delisting has to happen, then I would encourage you to make the draft delisting proposal stronger to protect those bears whose territories expand outside Yellowstone and Grand Teton National Parks. I would like to see a buffer area expanded to include the entire Greater Yellowstone Ecosystem with corridors to connect this area with that of other grizzly bear habitats, increasing the genetic viability of these bears. At this time, there is no economic or safety value to delisting. "Problem" bears are still handled on a case by case basis and economically, their value as a draw to the National Parks (Yellowstone and Teton) where they reside is estimated to be greater than \$10,000,000 per year. Any income gained by delisting and issuing hunting permits would be short lived and modest to nonexistent in comparison. The argument that trophy hunting will be economically important to saving the grizzly is arcane and outdated. One should also factor in the sentiments not only of our nation, but that of people from around the globe, many whom travel to the US annually for the chance of glimpsing one of these iconic bears. How can we ask other nations to conserve and protect their wildlife when we stop protecting ours? And, yes, they are a keystone species. Their recovery, along with that of the two other major predators in Greater Yellowstone, the wolf and the mountain lion, have been shown to have improved the health of the entire ecosystem. I hope that you will consider this argument and that, in the final vote, our federal government will stand behind continuing to protect this iconic species. Sincerely, Candace Brad, DVM	Endangered Species Coalition	

I vote, I own an engineering company (job creator) and I want my taxes to go toward supporting wildlife not decreasing support.	Miscellaneous	Dear Director Ashe, I urge you to strengthen and NOT weaken any protections for grizzly bears. Wildlife struggles in our modern world and needs all the protection it deserves. The Endangered Species Act is one of the best pieces of legislation ever and I strongly and fiercely support it. I am a political moderate, I vote, I own an engineering company (job creator) and I want my taxes to go toward supporting wildlife not decreasing support. Period. The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€œthey should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in Westâ€œthey are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	
Grizzlies are also an apex predator and as such assist in maintaining the health of the Greater Yellowstone Ecosystem. They allow biodiversity to flourish by keeping the elk and deer herds healthy, which reduces the over-grazing along rivers and streams, which maintains good habitat for other species to use	Miscellaneous	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€œthey should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in Westâ€œthey are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Grizzlies are also an apex predator and as such assist in maintaining the health of the Greater Yellowstone Ecosystem. They allow biodiversity to flourish by keeping the elk and deer herds healthy, which reduces the over-grazing along rivers and streams, which maintains good habitat for other species to use. Thank you. Sincerely,	Endangered Species Coalition	
Intrusions of private entities on public lands is no longer tolerable. Ranchers and farmers receiving federal subsidies--that is taxpayer subsidies, individuals slaughtering wildlife for entertainment should be reined in. Our wild life, including the grizzly bears, require continued protection. These lands and animals and ecologies and environments belong to all Americans. New strategies and new policies are needed for the future	Miscellaneous	Dear Director Ashe, In the past few weeks a number of threatened or endangered species, including macaws, have been proposed to be removed from any type of protection status. Wildlife protection status is not just about a species any longer. Advances in scientific studies, projects, and programs over the past two decades demonstrate the interdependence of species in maintaining diverse ecological systems. More importantly, we need every inch, every foot, every acre of wild lands and our waters to be protected, managed, and sustained in the face of a transforming world and accelerating climate change. Intrusions of private entities on public lands is no longer tolerable. Ranchers and farmers receiving federal subsidies--that is taxpayer subsidies, individuals slaughtering wildlife for entertainment should be reined in. Our wild life, including the grizzly bears, require continued protection. These lands and animals and ecologies and environments belong to all Americans. New strategies and new policies are needed for the future. The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€œthey should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in Westâ€œthey are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	
Grizzly bears are an iconic animal in Westâ€œthey are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region.	Miscellaneous	Dear Director Ashe, Grizzly bears are an iconic animal in Westâ€œthey are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan and conservation strategy to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	
These bears generate billions of dollars in tourist revenues a year and you want to give that up so they can be indiscriminately killed?	Miscellaneous	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€œthey should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Clearly as the death of Scarface in November 2015 shows, Grizzlies are endangered by "hunters who do not obey the laws." The recent case of a bear being chased down by a truck, these behaviors show what will happen if these iconic bears are delisted. Unfortunately, the 'out of control,' portion of the population who want to trophy hunt and kill these bears irresponsibly, make it impossible to delist them. They have only just returned from the brink. Grizzly bears are an iconic animal in Westâ€œthey are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. These bears generate billions of dollars in tourist revenues a year and you want to give that up so they can be indiscriminately killed? Why? Thank you. Sincerely,	Endangered Species Coalition	

This is a keystone, apex species that is needed for a healthy and functioning ecology on our native lands.	Miscellaneous	Dear Director Ashe, The grizzly bear is one of America's most iconic species and must get full protections from the US Government. In fact, the grizzly could have been our national mammal, instead of the bison. This is a keystone, apex species that is needed for a healthy and functioning ecology on our native lands. I ask that you protect this species or face enormous criticism that you failed to be a good steward of our wildlife and wild lands. The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€”they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in Westâ€”they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	
Grizzly bears are an iconic animal in West. I know they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region.	Miscellaneous	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been an amazing Endangered Species Act success story. However, after reading it today, I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope. They should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears therein. Secondly, please create a delay in the onset of any grizzly bear hunting for several years, post-delisting, to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Especially there, we should definitely treat them as our neighbors, not merely as game animals. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. This should be standard policy in national parks and forests. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in West. I know they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	
Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead.	Miscellaneous	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	
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Tourism generates far more revenue than trophy hunting , and from an outstate perspective I would/will prefer to visit Yellowstone with non hunting policy and wildlife preservation policy .	Miscellaneous	I am writing to ask that you do not delist Yellowstone grizzly bears. Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered. Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. Tourism generates far more revenue than trophy hunting, and from an outstate perspective I would/will prefer to visit Yellowstone with non hunting policy and wildlife preservation policy.	Humane Society	Tourism and Revenue
In addition, viewing bears along roadside habitats is popular in Yellowstone National Park. A 2014 study published in the Journal of Environmental Management found that on average, visitors to Yellowstone National Park are willing to pay around \$41 more in Park entrance fees to ensure that bears are allowed to remain along roads within the Park. These same bears are often the same ones who often live and den several miles outside of the Yellowstone National Park, where hunting would be legal once the ban is lifted. Hunting would therefore put these human-habituated bears in harm's way first and foremost, and their absence, or simply having less bears to see, would jeopardize a burgeoning economy built on bear viewing, which has been quantified to roughly \$10 million in tourism revenue	Miscellaneous	I am writing to ask that you do not delist Yellowstone grizzly bears. Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered. Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. In addition, viewing bears along roadside habitats is popular in Yellowstone National Park. A 2014 study published in the Journal of Environmental Management found that on average, visitors to Yellowstone National Park are willing to pay around \$41 more in Park entrance fees to ensure that bears are allowed to remain along roads within the Park. These same bears are often the same ones who often live and den several miles outside of the Yellowstone National Park, where hunting would be legal once the ban is lifted. Hunting would therefore put these human-habituated bears in harm's way first and foremost, and their absence, or simply having less bears to see, would jeopardize a burgeoning economy built on bear viewing, which has been quantified to roughly \$10 million in tourism revenue. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society	
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I am tired of my tax dollars going to government agencies who do not act in the interest of those we are paying you to protect! Leave the Grizzlies protected and stop bowing to pressure from ranchers and trophy hunters.	Miscellaneous	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. I am tired of my tax dollars going to government agencies who do not act in the interest of those we are paying you to protect! Leave the Grizzlies protected and stop bowing to pressure from ranchers and trophy hunters. Do what we pay you for!	Humane Society Petition	tax payers money
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FROM THE EAST ENTRANCE OF YELLOWSTONE NATIONAL PARK. THE GRIZZLY BEARS AND OTHER ANIMALS THAT CALL THE AREA HOME, ARE A VITAL PART OF THE TOURISM ECONOMY...WE DESPERATELY NEED THE WILDLIFE TO DRAW PEOPLE TO THE AREA !!!	Miscellaneous	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. I AM ALSO A PROPERTY OWNER IN WAPITI, WYOMING WHICH IS LOCATED 15 MILES FROM THE EAST ENTRANCE OF YELLOWSTONE NATIONAL PARK. THE GRIZZLY BEARS AND OTHER ANIMALS THAT CALL THE AREA HOME, ARE A VITAL PART OF THE TOURISM ECONOMY... WE DESPERATELY NEED THE WILDLIFE TO DRAW PEOPLE TO THE AREA !!!	Humane Society Petition	
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Simply because we exist doesn't mean that food competitors need to die. We get our food from the supermarket and they sometimes forage from our trash, so there's no competition anyway. We can do better than allowing their slaughter for our comfort or entertainment. We must do better .	Miscellaneous	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. ** Simply because we exist doesn't mean that food competitors need to die. We get our food from the supermarket and they sometimes forage from our trash, so there's no competition anyway. We can do better than allowing their slaughter for our comfort or entertainment. We must do better.	Humane Society Petition	

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Yellowstone park needs it's apex predators to ensure a stable forest population of elk. If anything monitor the bears and keep them but relocate them to other parks if needed . Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE x area.	Miscellaneous	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range as Yellowstone park needs it's apex predators to ensure a stable forest population of elk. If anything monitor the bears and keep them but relocate them to other parks if needed. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	
Under the Public Trust Doctrine, wildlife is an asset held in trust by government, for the benefit of not only the whole public but also future generations. Exposing our grizzly's population to the danger of falling below the numbers needed to maintain viable populations does not meet the fiduciary responsibilities that the Federal government, as trustees, have the duty to execute faithfully with respect to both the bears and to the wild lands which depend on the bears' contributions to continue in good health.	Miscellaneous	Under the Public Trust Doctrine, wildlife is an asset held in trust by government, for the benefit of not only the whole public but also future generations. Exposing our grizzly's population to the danger of falling below the numbers needed to maintain viable populations does not meet the fiduciary responsibilities that the Federal government, as trustees, have the duty to execute faithfully with respect to both the bears and to the wild lands which depend on the bears' contributions to continue in good health. The financial gain that departments of wildlife may realize as the result of returning to trophy hunting of bears - at the expense of the health of the bear's numbers - does not abrogate these duties and responsibilities. The failure to faithfully execute these constitutes clear failure of the government to carry out their duties in a faithful and conscientious mindfulness of these duties to the American people.	Humane Society Petition	
Ranchers and hunters do NOT have eminent domain rights over BLM or Federal lands. My tax dollars are better spent by allowing the native species a chance at survival .	Miscellaneous	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. The removal of this species from Federal protection will allow the states involved to allow the premature extinction of this great animal. This was their home before we took it from them, creating an imbalance in nature. Ranchers and hunters do NOT have eminent domain rights over BLM or Federal lands. My tax dollars are better spent by allowing the native species a chance at survival.	Humane Society Petition	Public lands and tax dollars.
Grizzly bears are an icon of Yellowstone park. One of their few protected habitats, Yellowstone also has notoriety for being the home of one of North America's largest predators. We need the Grizzly bear to keep this fragile ecosystem balanced. Their majestic presence adds enormously to the lure of Yellowstone park to tourists from around the world. Very few places on earth can visitors experience seeing these amazing large bears. Their protection is vital not only to the health of the ecosystem, but to the interest and experience of visitors from the U.S. and around the world.	Miscellaneous	Grizzly bears are an icon of Yellowstone park. One of their few protected habitats, Yellowstone also has notoriety for being the home of one of North America's largest predators. We need the Grizzly bear to keep this fragile ecosystem balanced. Their majestic presence adds enormously to the lure of Yellowstone park to tourists from around the world. Very few places on earth can visitors experience seeing these amazing large bears. Their protection is vital not only to the health of the ecosystem, but to the interest and experience of visitors from the U.S. and around the world. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	Tourism
Grizzly bears are also part of the wonderful fascination and wildlife that attract so many people to Yellowstone. With other members of this very special wildlife "community," like wolves, they are essential to balance. nature and the eco system.	Miscellaneous	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections. Grizzly bears are also part of the wonderful fascination and wildlife that attract so many people to Yellowstone. With other members of this very special wildlife "community," like wolves, they are essential to balance. nature and the eco system...They need PROTECTION, Not annihilation... Trophy hunters have NO respect for nature . They and their guns and traps should be PERMANENTLY banned from entering National Parks if their only reason to visit is to kill or maim;;, to claim a special "trophy" and pretend to be a hero....Our National Parks should NEVER condone this "sport". NEVER, NEVER...	Humane Society Petition	
Does the local economy REALLY need the income from trophy hunting, or are there more viable long term options that would sustain the bear population AND provide income ?	Miscellaneous	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Does the local economy REALLY need the income from trophy hunting, or are there more viable long term options that would sustain the bear population AND provide income? Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	
The wildlife watching, photographing, pro-wildlife population has absolutely no say in these matters - our voices need to count too, as we outnumber the extreme, fringe, anti-wildlife groups.	Miscellaneous	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. It has been scientifically shown that apex wildlife, such as the grizzly, are essential to healthy ecosystems. Grizzly bears have recovered to less than 10% of their original range - how can that be considered recovered enough to remove them from the endangered list? Living grizzly bears can bring in millions of dollars into the economy through wildlife watching, photographing, eco-tours, etc. Allowing hunting on these great American icons, lets a small extreme fringe of the population take the experience of viewing a grizzly bear in the wild away from everyone forever. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Why is it that only pro-hunting and anti-wildlife groups have all the sway with these decisions. The wildlife watching, photographing, pro-wildlife population has absolutely no say in these matters - our voices need to count too, as we outnumber the extreme, fringe, anti-wildlife groups. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	

At this time, there is no economic or safety value to delisting. "Problem" bears are still handled on a case by case basis and economically, their value as a draw to the National Parks (Yellowstone and Teton) where they reside is estimated to be greater than \$10,000,000 per year.	Miscellaneous	Dear Director Ashe, I am writing today to express my concern over the proposed plan to delist the Grizzly Bear from the Endangered Species Act. Many have stated on social media and in articles concerning the subject that appealing to your office and the state governments of Idaho, Montana and Wyoming is a waste of time. As far as I am concerned, you are still part of the US Government and, as such, for the people. Therefore, I am confident that you will treat the concerns of all constituents with thoughtful consideration in this and all matters related to your work. My vote would be to keep the Grizzly Bear under the protection of the Endangered Species Act. Yes, grizzly numbers in the Greater Yellowstone Ecosystem have grown from a low near 150 before listing, to over 700. Seven Hundred.....not a large number by any means. Couple that with the facts that they are very slow to reproduce, have at best a 50% chance of making it to breeding age and their primary food sources are being devastated by climate change make this rebound in numbers tenuous at best. If delisting has to happen, then I would encourage you to make the draft delisting proposal stronger to protect those bears whose territories expand outside Yellowstone and Grand Teton National Parks. I would like to see a buffer area expanded to include the entire Greater Yellowstone Ecosystem with corridors to connect this area with that of other grizzly bear habitats, increasing the genetic viability of these bears. At this time, there is no economic or safety value to delisting. "Problem" bears are still handled on a case by case basis and economically, their value as a draw to the National Parks (Yellowstone and Teton) where they reside is estimated to be greater than \$10,000,000 per year. Any income gained by delisting and issuing hunting permits would be short lived and modest to nonexistent in comparison. The argument that trophy hunting will be economically important to saving the grizzly is arcane and outdated. One should also factor in the sentiments not only of our nation, but that of people from around the globe, many whom travel to the US annually for the chance of glimpsing one of these iconic bears. How can we ask other nations to conserve and protect their wildlife when we stop protecting ours? And, yes, they are a keystone species. Their recovery, along with that of the two other major predators in Greater Yellowstone, the wolf and the mountain lion, have been shown to have improved the health of the entire ecosystem. I hope that you will consider this argument and that, in the final vote, our federal government will stand behind continuing to protect this iconic species. Sincerely, Candace Brad, DVM	NPCA	
Now is the time for the government to formally purchase and make forever wild vast tracks of the west, before it is lost forever to development. As large ranches close, it is an opportunity for the federal government to preserve and protect the land, rather than letting it fall to subdivisions and second-home owners .	Miscellaneous	Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: These bears will struggle to survive climate change. Already massive development in the areas surrounding the parks is threatening their survival, as well as that of other animals that need large spaces and migratory routes. Now is the time for the government to formally purchase and make forever wild vast tracks of the west, before it is lost forever to development. As large ranches close, it is an opportunity for the federal government to preserve and protect the land, rather than letting it fall to subdivisions and second-home owners. * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Thanks again for considering my comments.	NPCA	
I am also concerned about the usage of snowmobiles in Yellowstone Park . Grizzly Bears are now seen in the wintertime when they should be hibernating. Certainly the noise from the snowmobiles is contributing to this situation. Should this not be considered when evaluating treatment of the Grizzly in Yellowstone	Miscellaneous	Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. I am also concerned about the usage of snowmobiles in Yellowstone Park. Grizzly Bears are now seen in the wintertime when they should be hibernating. Certainly the noise from the snowmobiles is contributing to this situation. Should this not be considered when evaluating treatment of the Grizzly in Yellowstone? Thanks again for considering my comments.	NPCA	
As a traveller to your country the highlights have been experiencing your wonderful land and animals . You must protect what is uniquely yours at all costs	Miscellaneous	Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Thanks again for considering my comments. As a traveller to your country the highlights have been experiencing your wonderful land and animals . You must protect what is uniquely yours at all costs . The natural balance that high end predators provide for the environment is undeniable. Please retain their listing and provide more protection for them as once they are gone so will many tourists and the respect for your organisation.	NPCA	Tourism value
I have always wanted to visit the area but would not be able to in good conscience if this is allowed to happen. And I am sure this will cost a great deal in other tourist opportunities as well!	Miscellaneous	Thank you for the opportunity to comment today regarding the proposed delisting of the Yellowstone Grizzly Bears. This matter is very near and dear to my heart as I am a nature lover and extremely concerned member of the public regarding our wildlife and environment. I think we all know that this misguided move will only turn out to be an open season on the bears! Much to the delight of the "trophy hunters"! An enlightened species we have sadly, not yet become..... I have always wanted to visit the area but would not be able to in good conscience if this is allowed to happen. And I am sure this will cost a great deal in other tourist opportunities as well! It breaks my heart that so many have worked for so long to protect the innocent animals that we should be caring for and sharing this planet with when it seems like with the stroke of a pen it can all be undone! Have we brought so many amazing species back from the brink just to obliterate them once again???? I certainly hope not! We have to STOP giving in to a violent few that would kill, for no other reason than to have a the head of an intelligent and beautiful being on their wall or to have a disturbingly sick picture taken with their so-called conquest! We cannot back down in protecting our planet and its co-inhabitants and I implore you to stand with the compassionate majority and be a voice for the innocent and voiceless.	NPCA	Tourism revenue

Grizzly bears are the main attractions for tourists in all parks. If you start killing Grizzly you will hurt tourism badly. You need to be rational and use common sense: the trophy hunting will not give you so much money like grizzly, wolves/bison watching. You need to train tourists and hikers, especially people who tried to come close to animals. My best experience was to watch majestic grizzly in Denali last summer.	Miscellaneous	Grizzly bears are the main attractions for tourists in all parks. If you start killing Grizzly you will hurt tourism badly. You need to be rational and use common sense: the trophy hunting will not give you so much money like grizzly, wolves/bison watching. You need to train tourists and hikers, especially people who tried to come close to animals. My best experience was to watch majestic grizzly in Denali last summer.	NPCA	Tourism
The ecotourism industry brings millions of dollars a year to the area because visitors want to see grizzlies and wolves. Please listen to science and don't let your legacy be a bear rug.	Miscellaneous	Grizzlies of the Greater Yellowstone Ecosystem are still in danger. Climate change has affected their food sources and they don't have genetic diversity. They have a high mortality rate and low reproduction rate. Surrounding States are already planning to sell trophy hunting licenses to kill 100 grizzlies. The science prices all these issues and should be listened to. Logging, mining, and ranching interests support delisting for monetary gain. The ecotourism industry brings millions of dollars a year to the area because visitors want to see grizzlies and wolves. Please listen to science and don't let your legacy be a bear rug. #DontDelistGrizzlies	WELC	
Held sacred by native communities for thousands of years in the west, the majestic grizzly has become a treasured symbol of our wild heritage. Visitors spend millions of dollars in the region every year, a vital part of many local economies, in the hopes of spotting a magnificent grizzly. The loss of the grizzly would be a loss for the entire region, and a disservice to the wildlife professionals, dedicated conservationists and wildlife advocates who have fought to save them.	Miscellaneous	I am writing to urge you to postpone delisting of the Yellowstone grizzly bear population. The proposal to remove Yellowstone grizzly bears from the endangered species list fails to preserve the progress made toward bear recovery. In fact, it will reverse it. The Greater Yellowstone grizzly bear is one of the United States' most iconic species. Held sacred by native communities for thousands of years in the west, the majestic grizzly has become a treasured symbol of our wild heritage. Visitors spend millions of dollars in the region every year, a vital part of many local economies, in the hopes of spotting a magnificent grizzly. The loss of the grizzly would be a loss for the entire region, and a disservice to the wildlife professionals, dedicated conservationists and wildlife advocates who have fought to save them. While grizzlies have made a comeback, their recovery is still a delicate and uncertain effort. Grizzly bears occupy less than 2% of their historic range in the lower 48 and reproduce very slowly, at a rate of only 1-2 cubs every few years. In the Yellowstone region, the growth of the population has stalled since the early 2000s, and there was a 6% decline last year. The proposed rule leaves Greater Yellowstone grizzlies in the crosshairs, as states have made clear their plans to reduce the population, including through trophy hunts. Management of grizzly bears outside of the national parks would be left completely up to the states, which have historically been hostile to bears and other large carnivores. The current proposal would allow states to exceed maximum bear deaths for years before any review, allowing for potentially irreversible damage, and would allow complete eradication of bears in some areas. The loss of female grizzlies to trophy hunters who will not be able to tell the difference between a male and female bear could cause a steep, quick decline before emergency action can be taken. Additionally, the Yellowstone grizzly population remains isolated; further limiting their range and numbers could prevent them from ever connecting to other grizzly populations. People and bears can coexist. We should not let bears slide back towards extinction because of misplaced political hostility towards these magnificent and beloved creatures. The end result of this proposal will be fewer bears limited to less land and with access to fewer resources necessary for survival. For too long, human beings have assumed animals are non-sentient, unintelligent and, therefore, ours to disrespect and exploit as we will. Today, often new research is published that denies humankind's previously arrogant assumptions about other species, and our lack of respect and care must change. Money and politics should not have the weight that they do on what is essentially an ethical question.	WELC	
Please keep in mind if it is money that is driving this decision, that these iconic animals of our West are worth far more alive ----with specific regard to the tourist industry.	Miscellaneous	Please do not support the proposal to delist the Grizzly Bear. Human behaviour is already responsible for significant Grizzly Bear mortality-----either directly via illegal hunting or via traffic deaths or indirectly due to their ever shrinking habitat. Please keep in mind if it is money that is driving this decision, that these iconic animals of our West are worth far more alive ----with specific regard to the tourist industry.	WELC	
To delist the grizzlies would be a huge mistake for the economy and revenue that come into Yellowstone. they are the main attraction. THEY ARE YELLOWSTONE!	Miscellaneous	To delist the grizzlies would be a huge mistake for the economy and revenue that come into Yellowstone. they are the main attraction. THEY ARE YELLOWSTONE!	WELC	
Also, has anyone from USFWS consulted with the Canadians and what they are doing across the border to protect this keystone species?	Miscellaneous	Docket FWS-R6-ES-2016-0042-0001 Hello- I want to see bears in the Greater Yellowstone Ecosystem, where I live. They deserve to be here, I don't. Don't let them be hunted or destroyed. They are smart as is proven by the research quoted on your website. I have barely (pun intended!) seen 2 in the park, walking away or grazing, and minding their own business. This is as it should be. If these animals become de-listed, please make sure there is a strict short and long term plan created by each state where grizzlies are known to live or travel through. We don't want them to become hunters' targets. The species deserves to live and reproduce in numbers adequate that they find others with whom to mate that are unrelated. In Montana, this means they need to travel north/south along the Bitterroot and Gallatin mountains toward the national forests in and around Glacier Nat'l Park. Also, has anyone from USFWS consulted with the Canadians and what they are doing across the border to protect this keystone species? There are daily extinctions of species. Don't let this happen to this valued resource. Jerry Ladewig Emigrant, MT	FWS-R6-ES-2016-0042-0279	
Lastly, regarding claims that the Greater Yellowstone Grizzly has recovered enough range to be delisted - Under the Endangered Species Act, species must be treated as a whole. The Yellowstone Ecosystem population is no different biologically than other grizzlies in the Northern Continental Divide region. Therefore, you have no legal authority to delist the grizzly in the Greater Yellowstone Ecosystem.	Miscellaneous	I strongly oppose the delisting of Grizzly Bears in the Greater Yellowstone Ecosystem. FWS claims that it will be involved in management of and protecting the grizzly population after delisting. However, Montana has already decided to allow trophy hunting for grizzlies. Idaho, Montana, and Wyoming have shown themselves to be hostile towards predators, with little attempt to prosecute poaching, and only minor penalties for poachers who are prosecuted. You claim that there are enough grizzlies (700) in the Greater Yellowstone Ecosystem to delist them. How was the number of 700 arrived at, and by whom? Has this number been confirmed by an independent researcher, and if so, by whom? Dr. David Mattson, who has studied grizzlies and mountain lions for the last 35 years, 15 of which were intensive field study in Yellowstone, disagrees with this assessment. Even if your estimate is accurate, the population is still in danger. Whitebark pine is being killed off due to climate change, which removes a major food source for the grizzlies. A report by the Interagency Grizzly Bear Study Team that concludes that whitebark pine is not essential to the bears is conceptually flawed, with a bias towards a political agenda, and flatly contradicts an overwhelming body of earlier government research which demonstrated the importance of whitebark pine to the grizzly population. Other major food sources of the grizzly are stressed - cutthroat trout by invasives, and cutworm moths by pesticide use. The decrease in availability of food sources will result in healthier bears, greater mortality, and decreased fertility, all of which will lead to a decline in the bear population. Coming back from any population decline will be difficult for grizzlies, since the females only give birth every 3 years. Lastly, regarding claims that the Greater Yellowstone Grizzly has recovered enough range to be delisted - Under the Endangered Species Act, species must be treated as a whole. The Yellowstone Ecosystem population is no different biologically than other grizzlies in the Northern Continental Divide region. Therefore, you have no legal authority to delist the grizzly in the Greater Yellowstone Ecosystem. Please remember that the wildlife of this nation does not belong to the state Fish and Game Departments, nor to special interest groups such as hunters and outfitters, but to the people of this nation. Thank you for your consideration of my opinion.	FWS-R6-ES-2016-0042-5377	
enjoy the revenue these animals bring with them,	Miscellaneous	Just stop shooting everything in the US, just because you can! We certainly won't spend our hard earned money visiting your part of the world if you start shooting and trapping bears as well as wolves! We killed all the bears in the UK because we thought we didn't need them and the farmers didn't want them. Now we don't have the choice to reintroduce them and our lives are all the poorer for it, so is the ecosystem. What is the point in correcting the wrong that humans have done in the first place, repopulate an area with its natural inhabitants, enjoy the revenue these animals bring with them, marvel at their existence, admire their beauty, tenacity, grace and skills for survival, only to hunt them down years later because they were successful at reclaiming a part of the planet that was theirs in the first place? It's madness. Having stayed in and around Yellowstone National Park for 6 weeks, we didn't meet one resident that thought bears were an issue, but then wolves aren't either but they too get shot for sport. Thank heavens we have grown up here in the UK and have stopped all forms of hunting for sport or pleasure and you know what, we aren't overrun with foxes or sickly rabbits as predicted. The bear population will only increase whilst there is enough food, nature will make the alterations herself, without any human intervention.	FWS-R6-ES-2016-0042-0220	

MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. A	Miscellaneous	Please do NOT delist the grizzlies. -Trophy hunting of the grizzly is not sound management of the species. There should be a three to five year moratorium on even considering hunting as a management tool. -- GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. -The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. - MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it.	FWS-R6-ES-2016-0042-3011	
These magnificent animals are a top predator along with our wolves and need to remain protected particularly in the area of Yellowstone where due to no hunting they have become a very healthy successful population. There are not many places left where our top predators are afforded this well established safe and free life. These animals are very important to the land and a healthy ecosystem which we must work very hard to not destroy.	Miscellaneous	I am writing with great concern over the delisting of Grizzly Bears from Yellowstone. These magnificent animals are a top predator along with our wolves and need to remain protected particularly in the area of Yellowstone where due to no hunting they have become a very healthy successful population. There are not many places left where our top predators are afforded this well established safe and free life. These animals are very important to the land and a healthy ecosystem which we must work very hard to not destroy. This bill that gives states the right to kill our wildlife without the public having no say in over turning the ruling is just plain a major injustice. Our numbers are far greater than those supporting such actions which are ranchers and hunters. Yellowstone brings in a very large amount of tourism dollars in the name of viewing wildlife and for many it is a yearly venture. Some of our most iconic and historic species live in Yellowstone and they must be preserved before all they become is a story of the past. With our climate changing we are going to see many changes to the way our wildlife survives and they do not need massive human intervention added to this fate. Seems our wildlife including Grizzly Bears are stuck in a political tug of war and this needs to stop! Our wildlife and their habitat is not about greed it is about science...pure and simple. We owe it to our future generations to preserve the majestic wildlife and the limited lands they have left before it is too late. We have spent far too much money to reintroduce, list and protect species such as Grizzlies to spend more money killing them. Plain and simple it is just wrong! We need agencies that are knowledgeable about our wildlife and their benefits to the planet and not ones that bow to special interest and offer no protections. I have always wanted to visit Yellowstone but if the killing continues as I have with Idaho I will be avoiding Montana & Wyoming as well. I simply cannot support these practices!	FWS-R6-ES-2016-0042-0013	
The problem comes in as many of the bears who spend their summer in Yellowstone -- the same ones where a study found that people would pay an extra \$41 if they are guaranteed to see a bear -- are human-habituated. They are in many ways celebrities. But bears do not understand political boundaries. And for those who are these celebrities within the Park, they don't know the difference between a human pointing a camera or a gun. As such, the first and most likely victims of trophy hunting are these roadside, human-habituated bears.	Miscellaneous	While I am sure many people are contributing scientific comments about why the delisting should not occur, I would like to discuss why delisting would be bad in terms many people will understand: money. Simply stated: Lift the ESA ban on hunting and the local economy could lose a growing revenue stream that is currently estimated at \$10 million, and would affect more than 150 jobs in the area. Why? The lifting of ESA protections and granting the management of bears to individual states mean one thing: trophy hunting. It is an activity that attracts a small percentage of the population, and brings in far less than the estimated \$10 million in revenue in the non-consumptive activity of bear viewing. The problem comes in as many of the bears who spend their summer in Yellowstone -- the same ones where a study found that people would pay an extra \$41 if they are guaranteed to see a bear -- are human-habituated. They are in many ways celebrities. But bears do not understand political boundaries. And for those who are these celebrities within the Park, they don't know the difference between a human pointing a camera or a gun. As such, the first and most likely victims of trophy hunting are these roadside, human-habituated bears. Of course, not every bear have the same tolerance for people. By killing the most people-habituated ones first would leave a population of bears that are more prone to hide from people (we can't simply replace a human-conditioned bear with one that isn't, which is something the statistics do not account). It's really hard to take in the activity of bear viewing it they are constantly trying to hide. This will do nothing to satisfy the growing demand of people wanting to see bears, and the loss of the road-side bears by killing them outside the park will have a negative impact on the jobs and the revenue as outlined above. For these reasons, and for reasons outlined by those with a much more scientific-based argument on the biology of bears and their habitat, I urge that the ESA protections remain in place.	FWS-R6-ES-2016-0042-0024	Tourism/money
Over the last two decades, Defenders has played an important role in the recovery of grizzly bears in the northern Rockies. Recognizing that the largest threat facing long term grizzly bear recovery is human related mortalities, Defenders has focused heavily on minimizing conflicts between bears and people through our grizzly bear coexistence program. Since 1997, we have invested more than \$1,000,000 in over 300 on-the-ground projects in the states of Montana, Idaho and Wyoming. Additionally, since 1997 Defenders has reimbursed livestock owners in Montana and Idaho more than \$423,000 for livestock losses due to grizzly bears (Wyoming has a state run program). Defenders pays full market value for livestock verified to have been killed by a grizzly bear and 50% for livestock deemed "probably" killed by a grizzly bear. In 2013, the Montana Livestock Loss Board added grizzly bears to its compensation and conflict prevention program, to which we contributed \$25,000 in startup funding. Defenders continues to pay compensation in Idaho where a state-run program does not yet exist. Defenders is committed to the recovery of grizzly bears both on the ground and at the policy level. Our policy work has included, but has not been limited to: Defenders' significant role in the late 1990s assisting the FWS with a proposal to reintroduce grizzly bears into the Bitterroot. Defenders' Federal Lands program working tirelessly addressing forest policy changes that impact grizzly bears and we continue to fight state and federal legislation that may endanger or undermine grizzly bear recovery.	Miscellaneous	Thank you for the opportunity to comment on the proposed rule to remove the Greater Yellowstone Ecosystem (GYE) population of grizzly bears from Endangered Species Act (ESA) protections. Defenders of Wildlife (Defenders) is a national non-profit conservation organization founded in 1947 focused on conserving and restoring native species and the habitat upon which they depend. We submit the following comments on behalf of our more than 1.2 million members and supporters nationwide. Over the last two decades, Defenders has played an important role in the recovery of grizzly bears in the northern Rockies. Recognizing that the largest threat facing long term grizzly bear recovery is human related mortalities, Defenders has focused heavily on minimizing conflicts between bears and people through our grizzly bear coexistence program. Since 1997, we have invested more than \$1,000,000 in over 300 on-the-ground projects in the states of Montana, Idaho and Wyoming. Additionally, since 1997 Defenders has reimbursed livestock owners in Montana and Idaho more than \$423,000 for livestock losses due to grizzly bears (Wyoming has a state run program). Defenders pays full market value for livestock verified to have been killed by a grizzly bear and 50% for livestock deemed "probably" killed by a grizzly bear. In 2013, the Montana Livestock Loss Board added grizzly bears to its compensation and conflict prevention program, to which we contributed \$25,000 in startup funding. Defenders continues to pay compensation in Idaho where a state-run program does not yet exist. Defenders is committed to the recovery of grizzly bears both on the ground and at the policy level. Our policy work has included, but has not been limited to: Defenders' significant role in the late 1990s assisting the FWS with a proposal to reintroduce grizzly bears into the Bitterroot. Defenders' Federal Lands program working tirelessly addressing forest policy changes that impact grizzly bears and we continue to fight state and federal legislation that may endanger or undermine grizzly bear recovery. Defenders opposes the U.S. Fish and Wildlife Service's (FWS) proposed rule to remove the GYE grizzly bear population from ESA protections for the following reasons, which we explain in detail below: 1) FWS's proposed rule relies on an assumption that state and other federal agencies will provide adequate regulatory mechanisms to protect the grizzly bear post-delisting, even though those regulatory mechanisms do not currently exist and are certainly not enforceable; 2) the post-delisting habitat protections and mortality limits required by FWS in the proposed rule will not provide for long-term recovery of the grizzly bear; and 3) numerous and significant inconsistencies currently exist between the proposed rule, the recovery plan, and the conservation strategy that undermine FWS's assumptions about the level of protection that would be in place post delisting and make it difficult to assess how much protection the rule would actually provide. We have attached our complete comments and associated appendices. Thank you for this opportunity to comment. Attachments 160510 FINAL to the FWS_Proposed Yellowstone Grizzly Delisting Greater Yellowstone Coalition GYE Griz Prop Zones 2 3 130620_DOW to FWS_Griz RP Dem Criteria	FWS-R6-ES-2016-0042-5018	

Is the Cattleman's Association ready to pick up the tab on the 1 Billion dollars that will be lost	Miscellaneous	Please do not take the Grizzly Bear off of the Endangered Species List. Do not turn the federal land over to the states. We found out what happened before the Endangered Species Act was enforced. The Grizzly Bear population dropped when the states controlled the population. It took the federal government to bring them back to where their numbers are today. And that took 40 years. These Grizzlies should not be hunted at all and especially for trophies. The Cattleman's Association must assume all responsibility if they are grazing cattle in Grizzly Bear habitat in our national forest, which is owned by more tax paying citizens that favors wildlife. There should be no Open Range in our national forest where Grizzlies and wolves reside. The wildlife were here first before cattle were brought here and the government does not charge enough in grazing fees. More money is brought in to local economy by world wide wildlife viewers, than hunting could ever bring in. When tourist go to Yellowstone and Grand Teton National Park to see the Grizzlies and wolves, and don't see them the revenue will drop. The Tourist will go elsewhere. Is the Cattleman's Association ready to pick up the tab on the 1 Billion dollars that will be lost. Restaurants, motels, gas stations and all related businesses will lose out. In 2015 64 known/probable mortalities in the demographic area in the Greater Yellowstone Ecosystem. There were an additional 7 that occurred outside the demographic monitoring area. This is the highest annual mortality total documented to date. State management of Grizzlies could lead to disastrous consequences for the population. There are trophy hunters who have already stated that if the Grizzlies are delisted, they want to kill Yellowstone and Grand Teton National Parks most popular Grizzly Bears. These are bears that draw tourist from around the world. The state of Wyoming, which holds the vast majority of the ecosystems Grizzlies, has proven itself incapable of managing large carnivores. These animals should never be hunted for trophies. All trophy hunting should be outlawed. In a crazy political year we have going on now, do what is right and protect the Grizzlies and wolves and do not delist them. You can always transplant Grizzlies to other areas in the country where their numbers are low (Glacier, Northern Cascades). The Fish and Wildlife Service should be protecting these great animals and not eliminating them.	FWS-R6-ES-2016-0042-0062	
support the proposal to remove the Grizzly Bear from protection under the ESA. If the ESA is to continue be a valid tool for conservation moving forward, it cannot be a one way street that charismatic megafauna are added to but never removed from. State management under the North American Model of Wildlife Conservation, to include regulated hunting, has been shown to be successful for many species including black bear, turkey and whitetail deer.	Miscellaneous	I support the proposal to remove the Grizzly Bear from protection under the ESA. If the ESA is to continue be a valid tool for conservation moving forward, it cannot be a one way street that charismatic megafauna are added to but never removed from. State management under the North American Model of Wildlife Conservation, to include regulated hunting, has been shown to be successful for many species including black bear, turkey and whitetail deer.	FWS-R6-ES-2016-0042-0076	
they have achieved s very large population that now is endangering the currant elk population so much as between the wolves and bears there will be no game left to hunt	Miscellaneous	I am for delisting the grizzly bear from protection as they have achieved s very large population that now is endangering the currant elk population so much as between the wolves and bears there will be no game left to hunt and then no reason to purchase a hunting license and that will put the Montana fish and game out of business. The Glacier park area is also in need of delisting as the same problem exist on this side of the state.	FWS-R6-ES-2016-0042-0119	
This can also bring some revenue to the state agencies, which are currently only spending revenue dealing with the problem bears. I	Miscellaneous	It is time to remove the Grizzly Bear from the Endangered Species List. The bear is successfully recovered, and should now be managed by the state agencies, which have successfully recovered many other species. Grizzly bear and human conflicts will be reduced due to the bears will begin to see humans as a potential threat again. At this time, the bears have no threats, and are becoming accustomed as such. This can also bring some revenue to the state agencies, which are currently only spending revenue dealing with the problem bears. I for one, am a fan of the bears, and look forward to viewing them. Allowing state management of the animal will allow the state to manage the bear for what is best for the bear. Currently, with this being under federal protection, the bear is being managed under assumptions at the national level, and not by those who care for the bears themselves. I fully support the delisting of this animal.	FWS-R6-ES-2016-0042-0192	
Viewing live grizzlies is an economic boon to areas that are lucky enough to have them. Allowing trophy hunting will take these viewing opportunities away. A trophy hunter killing a grizzly takes away from everyone the opportunity to see that grizzly ever again. A person who instead views live grizzlies, not only stimulates the local economy, but perpetuates that opportunity for others to have the same viewing experience - in my mind, it should be a no-brainer on what is the morally, ethically, and economically correct thing to do.	Miscellaneous	I respectfully urge you to not remove grizzly bears from the Endangered Species List. Trophy hunting is not the answer to management. These magnificent icons of American wilderness have recovered to less than 10% of their original habitat - how can that be considered recovered? Grizzly bears do not reproduce quickly, so any assault on their tenuous population could very well result in total extinction. These highly intelligent, sentient beings deserve better. They are apex predators that have a huge impact on a healthy ecosystem. Viewing live grizzlies is an economic boon to areas that are lucky enough to have them. Allowing trophy hunting will take these viewing opportunities away. A trophy hunter killing a grizzly takes away from everyone the opportunity to see that grizzly ever again. A person who instead views live grizzlies, not only stimulates the local economy, but perpetuates that opportunity for others to have the same viewing experience - in my mind, it should be a no-brainer on what is the morally, ethically, and economically correct thing to do. Please don't cave to the extreme, anti-wildlife special interest groups. The majority of Americans do not want grizzly bears de-listed. In a democratic society, the majority should rule, and in this case the majority would like to see the grizzly bear protected.	FWS-R6-ES-2016-0042-0315	
Its the same story with wolves, being killed for photo-ops, and recreation, and it is wrong. Wolves and bears bring in millions of tourist dollars every year. It is time to end catering to trophy-recreation hunters.	Miscellaneous	I am 100% against delisting Grizzly Bears. In the last 40 years millions of dollars have been spent to bring the Grizzly population from 125 to 725. 40 years is an awful long time to just raise the population by that little of amount. It would be a shame to undo that little bit of progress, just to appease trophy hunters looking for a photo-op, killing a bear for no other reason than recreation. Its the same story with wolves, being killed for photo-ops, and recreation, and it is wrong. Wolves and bears bring in millions of tourist dollars every year. It is time to end catering to trophy-recreation hunters.	FWS-R6-ES-2016-0042-0338	
Yellowstone is a World Heritage Park. The Grizzlies in and around Yellowstone belong not only to Americans but to all around the world. What rights do Montana Governor Bullock and Wyoming Governor Mead have in selling off our iconic Grizzlies to trophy hunters.	Miscellaneous	I support keeping the Grizzly Bear listed on the Endangered Species Act (ESA). Yellowstone is a World Heritage Park. The Grizzlies in and around Yellowstone belong not only to Americans but to all around the world. What rights do Montana Governor Bullock and Wyoming Governor Mead have in selling off our iconic Grizzlies to trophy hunters. In the year of 2015, there were 64 Grizzlies known and estimated unknown/unreported mortalities in the demographic monitoring area in the Greater Yellowstone Ecosystem. This includes natural mortalities as well. This is the highest annual mortality total documented to date. How do we know more Grizzlies were not killed and just never discovered? How do we know that the practice of Shoot, shovel and shut up is not impacting Grizzly populations? How do you know how many Grizzlies are really out there? It takes 10 years for a sow to have her first cub/cubs. Will cubs be killed too along with their mother? Young cubs will die without their mother. That would drop the Grizzly population even faster. Grizzly Bears have a large impact on the economy around the Yellowstone Ecosystem. Why would Governors Bullock and Mead want to as the old saying goes "Cut off the hand that feeds you"? These bears help bring in Millions if not Billions of dollars to their states. More money than so called "trophy hunters" ever will. Because once those bears are gone it will take another 40 years if not longer to bring them back depending on how far poachers destroy their numbers. I definitely support keeping all Grizzly Bears on the ESA.	FWS-R6-ES-2016-0042-0344	
40 years and millions of dollars were spent to recover them from a little over hundred to just over 700. That took 40 YEARS!! Why so quick to delist? What is the point of recovery if you turn around and kill without letting the effects of recovery sink in for 10 years or so?	Miscellaneous	I am against the delisting of grizzly bears. Grizzlies are the slowest reproducing mammal in the world. 40 years and millions of dollars were spent to recover them from a little over hundred to just over 700. That took 40 YEARS!! Why so quick to delist? What is the point of recovery if you turn around and kill without letting the effects of recovery sink in for 10 years or so? And with climate change happening, you haven't given them a fair chance. Predators are essential in the circle of life...you take them away and the ecosystem crumbles downward. Hunting predators is counterproductive and foolish. I am strongly against the delisting. This decision is wrong and does not listen follow what science says. Keep Grizzly Bears Listed!! Thank you	FWS-R6-ES-2016-0042-0336	
It is a vital part of the eco-system, and much more important as a tourist draw than as a potential rug.	Miscellaneous	Please do not delist the grizzly. It is a vital part of the eco-system, and much more important as a tourist draw than as a potential rug.	FWS-R6-ES-2016-0042-0364	
Grizzly Bears are an apex predator. They are required to keep healthy ecosystems functioning.	Miscellaneous	Grizzly Bears are an apex predator. They are required to keep healthy ecosystems functioning. Killing them will not do anything except cause problems with the fragile ecosystem in which they live. Please do not base decisions on the whims of minority groups (hunters, trappers, ranchers). Instead base them on sound science. Save Apex Predators.	FWS-R6-ES-2016-0042-0374	

At some point in time, we will have no vegetation due to the lack of predators keeping the wildlife in balance.	Miscellaneous	At some point in time, we will have no vegetation due to the lack of predators keeping the wildlife in balance. This country is traveling down a "kill them all" road that has a point of no return. If we kill the grizzlies, the wolves, the mountain lions, etc, we are then put in the position to kill their prey or face the consequences of the animals eating all of the vegetation, including our food sources. As children we learned the circle of life, the checks and balances of every animal eats and all but the top predators are eaten. This is nature. Humans killing everything only creates problems, as we learn after the fact. If the grizzlies are leaving the park in search of food it only shows that the park environment needs time to rehabilitate itself. The prey leave, the predators leave, the plant life and smaller animals rebound. Then prey and predators return. Killing the predators because they travel outside your invisible boundary line only ensures the park will never reach a natural balance. We have systems of protection like the ESA because people are ruled by money, greed, and fear. People in power cannot be trusted with our environment, as that power shifts every election cycle. If the decision of control is left to the surrounding states, the grizzlies will become extinct. The park is not in a position to sustain the bears, please allow them to find sustenance in the surrounding areas until the park recovers. Let nature take care of itself.	FWS-R6-ES-2016-0042-0434	
As a top tier predator, their presence is necessary to keeping their environment in check.	Miscellaneous	I am against the delisting of the Grizzlies. As a top tier predator, their presence is necessary to keeping their environment in check. While their numbers have been slowly increasing, they are not yet a stable population. Being, in effect, cut off from bears in other management and refuge areas by not having protected wildlife corridors between these places, you limit the genetic pool, which contribute to their decline. Instead of delisting, we need to not only protect the bears, but people who live in bear country need to learn to coexist with the bears and protected wildlife corridors need to be designated allowing bears to roam safely between the parks, refuges, and reserves. As for making profits from bears, photo safari's tend to make more money than trophy hunting because they can be taken almost all year round, and it doesn't end in death for the animals. Despite "training" and rules against killing female bears with cubs, it still happens because the females may leave their cubs in a tree to go forage for themselves. I have yet to get to visit the Yellowstone area, but I pray that when I do make it there, that the grizzly will be there and thriving.	FWS-R6-ES-2016-0042-0441	
Because wildlife watching brings in far more economically than does hunting in GYE states	Miscellaneous	We have lived, worked and recreated in the Greater Yellowstone Ecosystem (GYE) for almost 40 years, meeting working in Yellowstone National Park. We have explored by foot thousands of miles of trails into some of the most breathtaking landscapes on earth, filled with the suite of native wildlife that we so love and respect. We have seen many grizzly bears over the decades and no animal is more powerful in the public's sensibility than the Great Bear. It is our state animal, picked by Montana school children. Our native tribes greatly value the grizzly bear as do all of us who value our wild places and wildlife. The grizzly bear is greater than life; it represents all that we as a people almost lost and what we have preserved. We value our large predators, our carnivores, because they remind us that we share life together in this time and place. They represent the wilderness we almost lost. We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best: Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data. Because the ecosystem is becoming stressed by climate change causing dramatic changes in food supplies needed. Because all foods are not equal. Because grizzlies are being killed at a rate the slowly-reproducing animals cannot tolerate long-term; since 2002 the population has probably declined. Because connectivity with other bears depends upon GYE grizzlies roaming and hunting would preclude that. Because human caused mortality is mostly avoidable and prevention is not stressed enough. Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable. Because sport trophy hunting of grizzly bears would be abhorrent and would reverse recovery. Because tolerant bears that people see around the parks would be the first killed. Because wildlife watchers are ignored by state wildlife agencies and the USFWS. Just look at wolf and bison management. Because tribal interests are ignored by state wildlife agencies. Because wildlife watching brings in far more economically than does hunting in GYE states. Because listing the grizzly as a distinct population segment (DPS) is possibly illegal, because it precludes the bears seeking connectivity. Because the GYE grizzly bear lives on an ecological island. Because politics trumps science every time. We love our grizzly bears and want them protected from nefarious forces bent upon hunting them. USFWS should listen to the public's concerns, listen to opposing scientists and do the right thing. Do not delist the grizzly bear.	FWS-R6-ES-2016-0042-0422	Economic Value of tourism.
Instead of delisting, we need to not only protect the bears, but people who live in bear country need to learn to coexist with the bears and protected wildlife corridors need to be designated allowing bears to roam safely between the parks, refuges, and reserves. As for making profits from bears, photo safari's tend to make more money than trophy hunting because they can be taken almost all year round, and it doesn't end in death for the animals.	Miscellaneous	I am against the delisting of the Grizzlies. As a top tier predator, their presence is necessary to keeping their environment in check. While their numbers have been slowly increasing, they are not yet a stable population. Being, in effect, cut off from bears in other management and refuge areas by not having protected wildlife corridors between these places, you limit the genetic pool, which contribute to their decline. Instead of delisting, we need to not only protect the bears, but people who live in bear country need to learn to coexist with the bears and protected wildlife corridors need to be designated allowing bears to roam safely between the parks, refuges, and reserves. As for making profits from bears, photo safari's tend to make more money than trophy hunting because they can be taken almost all year round, and it doesn't end in death for the animals. Despite "training" and rules against killing female bears with cubs, it still happens because the females may leave their cubs in a tree to go forage for themselves. I have yet to get to visit the Yellowstone area, but I pray that when I do make it there, that the grizzly will be there and thriving.	FWS-R6-ES-2016-0042-0441	

There is a irrational cultural hostility toward grizzlies in Wyoming, a state where public officials want to suppress recovery, even preventing bears from inhabiting remote federal public lands in the Yellowstone region because priority is given to non-native, taxpayer-subsidized private cattle.	Miscellaneous	I completely OPPOSE delisting Yellowstone Grizzlies. There is a irrational cultural hostility toward grizzlies in Wyoming, a state where public officials want to suppress recovery, even preventing bears from inhabiting remote federal public lands in the Yellowstone region because priority is given to non-native, taxpayer-subsidized private cattle. Grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary.	FWS-R6-ES-2016-0042-5032	
At least with hunting some revenue for the park and future wildlife management will be made.	Miscellaneous	To those opposed. If hunting is not opened then the state will have to eventually eradicate the bears anyways. This has happened in other states where bear hunting was stopped. At least with hunting some revenue for the park and future wildlife management will be made.	FWS-R6-ES-2016-0042-0496	

Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife, primarily grizzlies and wolves. Allowing a "trophy" hunt, targeting the park grizzlies is not only an easy hunt, but not a hunt at all, no less an ambush of the species.	Miscellaneous	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife, primarily grizzlies and wolves. Allowing a "trophy" hunt, targeting the park grizzlies is not only an easy hunt, but not a hunt at all, no less an ambush of the species. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, even resistant to managing a species of high importance to the non-hunting public and/or the federal government (i.e. - Gray wolves). In addition, even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. In comparison to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of aggressive state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. It has taken 40 years of protections to get where we are today, lifting protections prematurely sets great risk and consequence for long term survival of the species; add to that a pending "trophy" hunt will insure the grizzly population to decline back towards extinction within a very short period of time. Finally, tourism to Yellowstone National Park, brings in millions of annually. ~~Delisting the iconic grizzly bear which people come from all over the globe to see, sets a negative tone, dangerous precedence, and puts that tourism in jeopardy.~~	FWS-R6-ES-2016-0042-0463	
Currently GYE Grizzly bears are at or near the carrying capacity for the area, leaving them on the Endangered Species List will only cause the use/waste of more tax dollars to relocate and protect these Grizzlies, not to mention the harm that will come to other large and small fauna.	Miscellaneous	"For the long-term viability of the Endangered Species Act, which is a powerful conservation tool, it needs to function as it was intended. It should not be used as a weapon to save some peoples' favorite animals from any possibility of human exploitation". Steven Rinella. Currently GYE Grizzly bears are at or near the carrying capacity for the area, leaving them on the Endangered Species List will only cause the use/waste of more tax dollars to relocate and protect these Grizzlies, not to mention the harm that will come to other large and small fauna. This plan only includes the GYE Grizzlies therefore allowing continued protection of land and resources to protect and growth of Grizzlies in other lower 48 regions. Freeing up the tax dollars to be better spent on these efforts as opposed to "wasting" those dollars protecting a population that has already recovered beyond what the Endangered Species Act requires. The Federal Government will have to first approve each state's management plan and thereby still maintains control or the GYE Grizzlies. Looking at the success with which the wolf recovery program has had should be a shining beacon as to how well the State's and Federal Government can work together to both provide protection to as well as control of any species looking to become delisted.	FWS-R6-ES-2016-0042-5058	Proper use of tax dollars.
For every one person who could shoot a given grizzly, fifty could have the experience if crossing its path, or seeing it through a telescope, finding its scat on a trail, or seeing the unbelievably high scratchings on a tree. Those are all memorable, maybe beautiful, maybe exhilarating or even terrifying experiences that make lifelong impressions and are taken away from a tourist, park ranger, local resident, and the whole ecosystem when a bear is killed.	Miscellaneous	It's misleading to give the doubling of this population as an indicator if its stability. That doubling was the growth from 2% of the number in existence for tens of thousands of years and then reduced by 98% in less than one hundred years by sport hunting, nearly decimated twice, to 4%. And that growth was a result if FWS efforts. Why would the FWS put the results of that work in jeopardy by allowing same practice that nearly brought the grizzly to extinction in the last century? "Fool me once..." It's like a contractor offering a long dormant group of arsonists the opportunity to keep burning a house that they once nearly destroyed and he hasn't quite repaired. Sport hunters aren't criminals, but it is a destructive practice that depletes a population much faster than government efforts can rebuild them. FWS' works shouldn't be squandered like this. Only 20-26% of people surveyed have supported delisting or hunting seasons and the rates are lower in the local area. 50 Native governments have sent formal documents announcing their opposition to the delisting. There is no popular support for delisting. The tourism benefit of bringing into GYE sport hunters is so small compared to the loss of non-hunting tourists, as all of them now are, for whom the chance of seeing wildlife is such an important part of the park's appeal. For every one person who could shoot a given grizzly, fifty could have the experience if crossing its path, or seeing it through a telescope, finding its scat on a trail, or seeing the unbelievably high scratchings on a tree. Those are all memorable, maybe beautiful, maybe exhilarating or even terrifying experiences that make lifelong impressions and are taken away from a tourist, park ranger, local resident, and the whole ecosystem when a bear is killed. The potential tourism growth is outweighed by the potential loss, people don't support this, at all, and it doesn't make sense to hand the small recovery the GYE ecosystem has made straight back to the interests that recklessly inflicted the injury it's currently nursing, no matter how slow or carefully.	FWS-R6-ES-2016-0042-5067	

It has taken 40 years of protections to get where we are today, lifting protections prematurely sets great risk and consequence for long term survival of the species; add to that a pending "trophy" hunt will insure the grizzly population to decline back towards extinction within a very short period of time.Finally, tourism to Yellowstone National Park, brings in millions of annually. Delisting the iconic grizzly bear which people come from all over the globe to see, sets a negative tone, dangerous precedence, and puts that tourism in jeopardy.	Miscellaneous	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are use to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife, primarily grizzlies and wolves. Allowing a "trophy" hunt, targeting the park grizzlies is not only an easy hunt, but not a hunt at all, no less an ambush of the species. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, even resistant to managing a species of high importance to the non-hunting public and/or the federal government (i.e. - Gray wolves). In addition, even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. In comparison to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of aggressive state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. It has taken 40 years of protections to get where we are today, lifting protections prematurely sets great risk and consequence for long term survival of the species; add to that a pending "trophy" hunt will insure the grizzly population to decline back towards extinction within a very short period of time. Finally, tourism to Yellowstone National Park, brings in millions of annually. ~~Delisting the iconic grizzly bear which people come from all over the globe to see, sets a negative tone, dangerous precedence, and puts that tourism in jeopardy.~~	FWS-R6-ES-2016-0042-0463	
Freeing up the tax dollars to be better spent on these efforts as opposed to 'wasting' those dollars protecting a population that has already recovered beyond what the Endangered Species Act requires.	Miscellaneous	"For the long-term viability of the Endangered Species Act, which is a powerful conservation tool, it needs to function as it was intended. It should not be used as a weapon to save some peoples' favorite animals from any possibility of human exploitation". Steven Rinella Currently GYE Grizzly bears are at or near the carrying capacity for the area, leaving them on the Endangered Species List will only cause the use/waste of more tax dollars to relocate and protect these Grizzlies, not to mention the harm that will come to other large and small fauna. This plan only includes the GYE Grizzlies therefore allowing continued protection of land and resources to protect and growth of Grizzlies in other lower 48 regions. Freeing up the tax dollars to be better spent on these efforts as opposed to 'wasting' those dollars protecting a population that has already recovered beyond what the Endangered Species Act requires. The Federal Government will have to first approve each state's management plan and thereby still maintains control or the GYE Grizzlies. Looking at the success with which the wolf recovery program has had should be a shining beacon as to how well the State's and Federal Government can work together to both provide protection to as well as control of any species looking to become delisted.	FWS-R6-ES-2016-0042-5058	Usage of tax dollars

rizzlies in the GYE are facing catastrophic losses to several of their key food sources, such as whitebark pine and cutthroat trout. The service's recent research on whitebark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy whitebark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals.	Miscellaneous	Grizzlies in the GYE are facing catastrophic losses to several of their key food sources, such as whitebark pine and cutthroat trout. The service's recent research on whitebark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy whitebark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals. Moreover, grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary. Furthermore, the USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. Additionally, the USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). USFWS's proposal also does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. Due to all of these unknowns regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population, I believe the better suited and pragmatic approach of waiting five years to see how the population is responding to these threats should be taken instead.	FWS-R6-ES-2016-0042-5093	
Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399 would be threatened by the delisting.	Miscellaneous	I am a veterinarian, a biologist and a concerned citizen and for the reasons stated below, it is my firm contention that grizzly bears should not be delisted in the Greater Yellowstone Ecosystem. Actual numbers of grizzly bears are merely estimates as are the numbers required to support a sustainable populations for one of the slowest-reproducing mammals in North America with female grizzlies giving birth only every three years, if conditions are right. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399 would be threatened by the delisting. FWS could well see more than 40 years of recovery efforts squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America.. By the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range and grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yaak region." Therefore, the grizzly bear cannot be delisted in just the GYE. The management of isolated populations of free-ranging carnivores like grizzly bears and wolves is flawed. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. A leaked memo states that if the GYE grizzly bears are delisted, that they will open up trophy hunting seasons for grizzlies in Wyoming, Idaho and Montana which suggests that opening such seasons is a prime motivation for the states in pushing for de-listing. The FWS needs to strongly consider the majority interests of the American people including hunters. A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: -55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. -More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. -Only 20% support trophy hunting. -50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. -62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS needs to make a concerted effort to work with the Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online Net also reported that the Ojibwa-Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental	FWS-R6-ES-2016-0042-5116	
5. It would seem that Yellowstone Park must have wildlife to support the financial aspect of how this park is maintained. If the Bear population were to continue to grow unchecked it will become inevitable that bears will kill other Grizzly Bears, black bears, and anything else that is a food resource. Does it serve the bear to allow bears to fight each other for sustenance?	Miscellaneous	While the Grizzly Bear is an icon of the Yellowstone Eco System I suggest these observations: 1. Yellowstone Park is overpopulated with people. 2. The concentration of people on the limited road access has driven these icons further away from mass crowds gawking at wildlife. 3. The number of bears outside of the park has reached a potential crisis point. 4. Every predator (defined as an animal that will kill anything to be fed) needs a predator. The sad truth is the human is the only predator of the Grizzly. It is our responsibility that these bears are controlled. This does not mean that they should never kill a domesticated animal but they should be regulated. 5. It would seem that Yellowstone Park must have wildlife to support the financial aspect of how this park is maintained. If the Bear population were to continue to grow unchecked it will become inevitable that bears will kill other Grizzly Bears, black bears, and anything else that is a food resource. Does it serve the bear to allow bears to fight each other for sustenance? My suggestion is to evaluate how the Park manages the tourists. They are the top of the food chain. Then create new zones for tourists within the Park. After all it was created "for the people" and today it is managed not for the people. Millions come in the summers and it is highly unlikely they will see a Grizzly Bear, let alone any wildlife other than Buffalo which are about the same as Angus cows grazing Paradise Valley. It is really disappointing to see how poorly Yellowstone Park is managed. It is embarrassing to see how the visitors who come to interact with wildlife are directed to a highway and accommodated with shabby campgrounds, and poor housing. It has become a theme park without a theme.	FWS-R6-ES-2016-0042-5131	

It has taken many decades and millions of our tax dollars to change the trend toward extinction and hunting these iconic creatures seems contrary to everything that we have achieved	Miscellaneous	To the U.S. Fish and Wildlife Service: I am writing for the board of directors of the North Fork Preservation Association to comment on the proposal to remove Grizzly Bears in the Greater Yellowstone Ecosystem from the Federal List of endangered and threatened wildlife. Our community on the North Fork of the Flathead River in Northwest Montana, sitting just below the U.S./Canadian border next to Glacier National Park is one of the most ecologically diverse regions in North America. We also have the highest population of Grizzly Bears in the lower 48 states. Surrounded by public land and wildlife habitat, we have learned to live peacefully in the Grizzlies country. We value these bears and have enjoyed watching their numbers grow over the last few decades. The conservation efforts that have been deployed to encourage the Grizzly Bears recovery have been a great success. However, these efforts should be continued until Grizzly populations are connected over the entire landscape between Yellowstone and the Yukon. Isolated populations do not do well over the long run. Grizzly Bears need to be allowed to roam freely through all areas with suitable habitat. The Yellowstone grizzly bear population is an isolated population. There is very little evidence that Grizzly Bears from Yellowstone travel to other Grizzly Bear populations to the north. Without this connectivity, genetic diversity cannot remain strong in the Yellowstone population. For this reason, we feel that it is too early to delist Grizzly Bears. We also disagree with trophy hunting grizzly bears. It has taken many decades and millions of our tax dollars to change the trend toward extinction and hunting these iconic creatures seems contrary to everything that we have achieved. In addition, the status of Grizzly Bears in the public mind has risen. Many visitors come to Montana and Wyoming hoping to see a Grizzly Bear. These bears are the heritage of all of the people in the U.S., not just those of us who live in Montana, Wyoming, or Idaho. Just from an economic viewpoint these Bears generate more income for Montana, Wyoming, and Idaho from visitors than will ever be realized from 10-50 annual Trophy Tags. There are many more people who want to see a grizzly bear than shoot one. There also needs to be adequate and continual funding for Bear conservation in place, including bear management personnel to deal with bear-people conflicts, before delisting happens. The loss of federal money for conservation efforts is a major concern regarding delisting. For these reasons, we oppose the delisting of Grizzly Bears at this time.	FWS-R6-ES-2016-0042-5128	Tax dollars
The extirpation of grizzlies and other large carnivores from an ecosystem is a global phenomenon with broad ecological consequences. Grizzlies and other carnivores benefit and shape our North American ecosystems.	Miscellaneous	I wish for the record to show that I am AGAINST the delisting of grizzlies in the Greater Yellowstone Ecosystem. The extirpation of grizzlies and other large carnivores from an ecosystem is a global phenomenon with broad ecological consequences. Grizzlies and other carnivores benefit and shape our North American ecosystems. The Endangered Species Act calls for restoration of threatened and endangered species to a SIGNIFICANT portion of their HISTORIC range, The word "historic" doesn't appear in the law, but "historic" is logically and scientifically inseparable from "significant". When USFWS wrote its first implementing regulation for the E.S.A., it interpreted the law and congressional intent to require restoration to historic ranges. This interpretation remained in place for over thirty years until the Bush Administration ILLEGALLY tried to reinterpret "range" to mean only "currently occupied" range to limit the biologically necessary but politically volatile expansion of such species as the wolf and grizzly bear. This latter day interpretation violates the restorative intent of the E.S.A. and the biological and ecological needs of the previously wide ranging species such as the Grizzly Bear. The E.S.A. does not envision the restoration of endangered and threatened species to geographical "zoos", especially with such historically wide ranging species as the grizzly. It envisions restoration of species to their historic habitat, NOT CURRENTLY OCCUPIED HABITAT. Grizzlies didn't evolve in geographic zoos and until their extermination began in the 17th century, they were spread all over the West That means that their genetic diversity and long term survival depended upon, and depends upon now, adaptations to different environments and interchange with other populations throughout the West. The intent of the E.S.A. is to replicate, as much as possible, these evolved natural conditions of the species. In other words, we're talking about a species that has an evolutionary biology and ecology that depends upon its being in lots of places at low densities rather than having large populations in a few places which would create serious biological and ecological problems. Grizzlies, being at the top of the food chain, are necessarily limited in number in specific areas by food availability. In short, that means what is natural for grizzlies is low densities in specific areas but widespread distribution of interconnected populations throughout the continent....this is how genetic diversity is maintained.....You maintain genetic diversity by having small stable populations spread widely across the landscape with dispersers moving among populations. It's about density and distribution and interconnectedness, not numbers of bears. I urge you to allow grizzlies to seek out new areas so that the connectedness will continue to spread. This WILL NOT be achieved under state management and under hunting pressure. In summary...the E.S.A. requires grizzly restoration to the species historic range. I ask you to take this into consideration and allow this dispersal to move forward without taking away the protections these bears need. If left to state management, this will not happen and once again grizzlies will persecuted and annihilated from our lands.	FWS-R6-ES-2016-0042-5190	
Delisting grizzly bears will not lead states to protect livestock better: Finally, traditional methods for managing bears in circumstances of livestock predation have not been effective in preventing further livestock losses (A. Treves, M. Krofel, J. McManus, Predator control need not be a shot in the dark. Front. Ecol. Environ., (in press).Delisting grizzly bears may open the U.S. Fish & Wildlife Service to lawsuit: I'm also alerting you of the risk that you are found to have abdicated your legal obligations under the U.S. public trust doctrine. That duty is a fiduciary duty as a trustee of wildlife for current and future generations (http://faculty.nelson.wisc.edu/treves/pubs/Predators-and-the-public-trust.pdf). Posterity and the courts will not look kindly on abdication of your legal duty. It is also an ethical and moral duty to future generations.	Miscellaneous	I am an associate professor of environmental studies and founder and director of the Carnivore Coexistence Lab at the University of Wisconsin-Madison. I have published >100 scientific papers on predator and prey ecology, carnivore management, and human dimensions of conservation. My team is the only team in the world to have published longitudinal studies of tolerance for a large carnivore by resampling the same individuals over time as policy changes. I oppose delisting grizzly bears for the following reasons: Delisting will not improve tolerance for grizzly bears or reduce poaching of grizzlies: I will speak to my research on gray wolves because of its relevance to all large carnivores including grizzlies. My research shows that tolerance for wolves did not improve when culling of wolves was allowed as measured by repeated mail-back questionnaires (http://faculty.nelson.wisc.edu/treves/pubs/Treves_et_al_2013.pdf) and measured in repeated focal groups (http://faculty.nelson.wisc.edu/treves/pubs/Browne-Nunez2015.pdf). Nor did tolerance improve when hunting and trapping of wolves was permitted (http://faculty.nelson.wisc.edu/treves/pubs/Hogberg_Treves_Shaw_Naughton-Treves_2015.pdf). In 2009, I reviewed evidence whether regulated hunting was a conservation strategy for large carnivores including grizzlies. I concluded there was not yet evidence that human attitudes would improve or that poaching would improve if carnivores were subject to public hunting and trapping (http://faculty.nelson.wisc.edu/treves/pubs/Treves_Hunting_to_conserve_carnivores.pdf). Recent review casts doubt on the idea that killing improves tolerance for any predator (http://faculty.nelson.wisc.edu/treves/pubs/Treves_Bruskotter_2014.pdf). Indeed today our paper has appeared online (G. Chapron, A. Treves, equal co-authors, 2016. Blood does not buy goodwill: allowing culling increases poaching of a large carnivore. Proceedings of the Royal Society B http://dx.doi.org/10.1098/rspb.2015.2939). Our work shows that liberalizing wolf-killing increased poaching of wolves. The same is likely to happen with grizzly bear delisting. Delisting grizzly bears will not lead states to protect livestock better: Finally, traditional methods for managing bears in circumstances of livestock predation have not been effective in preventing further livestock losses (A. Treves, M. Krofel, J. McManus, Predator control need not be a shot in the dark. Front. Ecol. Environ., (in press). Delisting grizzly bears may open the U.S. Fish & Wildlife Service to lawsuit: I'm also alerting you of the risk that you are found to have abdicated your legal obligations under the U.S. public trust doctrine. That duty is a fiduciary duty as a trustee of wildlife for current and future generations (http://faculty.nelson.wisc.edu/treves/pubs/Predators-and-the-public-trust.pdf). Posterity and the courts will not look kindly on abdication of your legal duty. It is also an ethical and moral duty to future generations.	FWS-R6-ES-2016-0042-5166	

- DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides	Miscellaneous	As a tax paying American I am asking that you do the right thing and NOT delist grizzlies! - DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states known for their hatred and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and most Americans (55%) oppose delisting. Even more Americans (68%) oppose hunting of grizzly bears if delisted. - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears.	FWS-R6-ES-2016-0042-5238	
If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it.	Miscellaneous	Greetings, I wish to offer the following comment regarding the intended rule change to remove the Greater Yellowstone Ecosystem population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I am against this proposed de-listing. De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. The theory that bears can adapt to development and the resulting changes in food sources is not supported by the evidence. Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, seasonable resilience, and availability throughout the habitat. The GYE grizzlies are an "island population". This means that they are adapted to live and thrive within a specific geographic range. Substantial threats or changes to that habitat would likely pressure the bears to try and relocate, but they cannot successfully do so. The Greater Yellowstone Ecosystem is the environment to which they have adapted over eons. There is not another environment to which they could relocate and remain a viable species. Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability. If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it. Please do not de-list this special population of bear.	FWS-R6-ES-2016-0042-5241	
On behalf of the over 20,000 member families of the Montana Farm Bureau Federation, I am writing to commend the proposal to remove the Grizzly Bear from the Endangered Species List. The members of the Montana Farm Bureau Federation (MFBF) are farming and ranching families from all over the state of Montana. We are the state's largest agriculture organization, representing the growers of all types of crops and livestock raised in Montana. Our members completely agree with what the Fish and Wildlife Service (FWS) states in their proposed rule: "The best available scientific and commercial data indicate that the Greater Yellowstone Ecosystem (GYE) population of grizzly bears (Ursus arctos horribilis) has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act." Farmers and ranchers in many parts of Montana have witnessed the very real consequences of grizzly bear recovery. For them, recovery means the expanding population of grizzly bears has resulted in conflict with and predation of livestock. According to Montana's Livestock Loss Board, 59 cattle, 32 sheep and one horse were killed by grizzly bears in 2015. This count only includes kills that ranchers were able to find, verify with authorities, and qualify for reimbursement under the Livestock Loss Mitigation Program. Certainly, many more livestock were killed by grizzlies that year but were unable to be identified or were completely consumed. The loss of livestock is not only devastating financially, it can be emotionally demoralizing to the owner of those livestock animals. This is especially troubling when there is little, if anything that can be done to protect livestock animals because the aggressing predator is a protected species and the owner would be subject to severe penalties, should they attempt to defend their livestock. Therefore, MFBF's members find it extremely refreshing to hear that FWS is considering a move to delist the grizzly bear.	Miscellaneous	On behalf of the over 20,000 member families of the Montana Farm Bureau Federation, I am writing to commend the proposal to remove the Grizzly Bear from the Endangered Species List. The members of the Montana Farm Bureau Federation (MFBF) are farming and ranching families from all over the state of Montana. We are the state's largest agriculture organization, representing the growers of all types of crops and livestock raised in Montana. Our members completely agree with what the Fish and Wildlife Service (FWS) states in their proposed rule: "The best available scientific and commercial data indicate that the Greater Yellowstone Ecosystem (GYE) population of grizzly bears (Ursus arctos horribilis) has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act." Farmers and ranchers in many parts of Montana have witnessed the very real consequences of grizzly bear recovery. For them, recovery means the expanding population of grizzly bears has resulted in conflict with and predation of livestock. According to Montana's Livestock Loss Board, 59 cattle, 32 sheep and one horse were killed by grizzly bears in 2015. This count only includes kills that ranchers were able to find, verify with authorities, and qualify for reimbursement under the Livestock Loss Mitigation Program. Certainly, many more livestock were killed by grizzlies that year but were unable to be identified or were completely consumed. The loss of livestock is not only devastating financially, it can be emotionally demoralizing to the owner of those livestock animals. This is especially troubling when there is little, if anything that can be done to protect livestock animals because the aggressing predator is a protected species and the owner would be subject to severe penalties, should they attempt to defend their livestock. Therefore, MFBF's members find it extremely refreshing to hear that FWS is considering a move to delist the grizzly bear. Thank you for your consideration. We support the decision to move forward with the rule and remove the Greater Yellowstone Ecosystem Population of Grizzly Bear from the Federal List of Endangered Species.	FWS-R6-ES-2016-0042-5246	
In 2011 grizzly bears were placed back on the endangered species list because this agency failed to consider threats to the grizzly bears food sources, and that scientific uncertainty was not a sufficient rationale for failing to evaluate possible risks to a species the FWS proposed to delist and remove See, from ESA protections. See, Greater Yellowstone Coalition, Inc v. Servheen, 665 F.3d 1015, (9th Cir. 2011), a copy of which is also attached hereto. This holding of Greater Yellowstone Coalition, Inc. v. Servheen is still applicable today, as we continue to face the increased effects of global warming, and the grizzly bears' food sources continue to fall under that threat. The US FWS would be wise to review the Court's decision, and the scientific resources cited therein, before taking the rash action of delisting the grizzly bear.	Miscellaneous	I strongly oppose the US FWS proposal to delist the Yellowstone grizzly bear and strip the species' ESA protections. I am a third generation Wyomingite, and a US citizen. I am concerned that Wyoming sees the delisting proposal as an invitation to begin hunting the bears as trophies. The grizzly bears have the greatest value to Americans, and all the public, alive. The US FWS holds wildlife in the public trust for the enjoyment of all, and if hunters are killing grizzlies for trophies, instead of me being able to enjoy seeing living bears, hunters will be hanging bear skins on their wall. Bears do not belong on walls, they belong in the ecosystem. Wyoming has already started a public comment period, which ends of April 14, 2016, to begin a trophy hunt of grizzly bears. This does not show an intent to protect the bears and ensure their continued survival. Wyoming's management plan is just a road map to killing bears, and a copy of it it attached hereto. This management plan demonstrates how important it is to leave grizzlies on the endangered species list. The USFWS conclusions that climate change is not a threat to the bears, and will not be in the future, overlooks the scientific facts regarding the grizzly's food sources. All the grizzly bears' major food sources are in decline: the whitebark pine due to pine beetle infestation, an infestation caused by our warming world, the cutworm moth, and the cutthroat trout which are under threat from the invasive lake trout. The US FWS argues that there are alternate sources of food available to the grizzly bears, but has not shown any scientific data that would even begin to establish that those purported alternative sources of food have the necessary nutrition to meet the grizzly bears' dietary needs. In 2011 grizzly bears were placed back on the endangered species list because this agency failed to consider threats to the grizzly bears food sources, and that scientific uncertainty was not a sufficient rationale for failing to evaluate possible risks to a species the FWS proposed to delist and remove See, from ESA protections. See, Greater Yellowstone Coalition, Inc v. Servheen, 665 F.3d 1015, (9th Cir. 2011), a copy of which is also attached hereto. This holding of Greater Yellowstone Coalition, Inc. v. Servheen is still applicable today, as we continue to face the increased effects of global warming, and the grizzly bears' food sources continue to fall under that threat. The US FWS would be wise to review the Court's decision, and the scientific resources cited therein, before taking the rash action of delisting the grizzly bear. Instead of delisting the grizzly bear, the US FWS should be seeking areas to reestablish the grizzly populations, which is a goal that the US FWS cited in its 2011 status review of grizzly bears. Additionally, the US FWS cited in that same review, an expectation that the Continental Dive bears and the Yellowstone bears would naturally connect "in the near future", however, that will not come to pass if trophy hunters are allowed to kill bears that leave the national parks systems. The US FWS has these expectations based on outdated research, and without taking into consideration the massive detrimental effects a delisting will have on the grizzly bear population. If the delisting happens, bears that strike out in order to seek new ecosystems will leave the protections of the national parks, and be subject to hunting, ensuring that these brave bears cannot aid in the continued survival of the species. There are resources for the bears, and ecosystems to support them, but the bears will never get there if we allow hunters to kill the bears once they leave the national parks. There is no evidence that the current grizzly population in the Greater Yellowstone ecosystem is diverse enough to provide the required genetic diversity to support the continued survival of the species. The Yellowstone grizzly population has not connected with the Northern Continental Divide grizzly population, or the Cabinet-Yaak region grizzly bears. The current bear separate populations need the opportunity to reach each other in order to ensure continued genetic diversity, and if hunters are allowed to kill grizzly bears then the moment grizzlies step outside the national parks they will be subject to trophy hunting, making it even more difficult, if not impossible, for the different bear groups to reach each other. The reasons not to delist the grizzly bear are legion, and the US FWS should not proceed with this rule. Please keep the grizzly bear's protected status under the ESA. The continued survival of	FWS-R6-ES-2016-0042-0524	

If we lose grizzly bears in the Yellowstone area, we risk losing part of what makes the region so incredible. GYE grizzlies are the most famous in the world and draw in millions of tourists looking to spot the large, rare species. Not to mention the significant impact those tourist dollars have on the local communities and businesses. I'm asking you to support what the majority of Wyoming citizens want which is continued Federal protection of the Grizzlies!!	Miscellaneous	Yet again, the U.S. Fish & Wildlife Service is making decisions for wildlife management that do not bode well for the actual recovery of the species they are supposed to be protecting. Their recent proposal to delist Greater Yellowstone Ecosystem (GYE) grizzly bears from the Endangered Species Act is far too premature and threatens the very existence of this population. There numbers are way too low, only around 700, and do not represent a healthy, recovered population that is large enough to be stable and able to withstand trophy hunting. If we lose grizzly bears in the Yellowstone area, we risk losing part of what makes the region so incredible. GYE grizzlies are the most famous in the world and draw in millions of tourists looking to spot the large, rare species. Not to mention the significant impact those tourist dollars have on the local communities and businesses. I'm asking you to support what the majority of Wyoming citizens want which is continued Federal protection of the Grizzlies!!	FWS-R6-ES-2016-0042-0541	
I think that within the Grizzly Bear Recovery Area or Grizzly Bear Recovery Zone outside of Yellowstone Park of the Greater Yellowstone Ecosystem grizzlies should NOT be hunted because there's a very rare phase of the grizzly that lives there that is even more endangered, the Black Grizzly, also documented by Doug Peacock in a chapter of his book the Grizzly Years. These Black Grizzlies also live in Yellowstone. It's a similar situation to the white Spirit or Kermode black bears that are found and given protection from hunting in Canada. There are too few of these bears to sustain a hunt, I've only seen a handful of them, though a number of them do exist, documented by extensive video and photos by another professional wildlife photographer and author. Since the Taylor Fork Drainage of Montana is also critical springtime lower altitude habitat for grizzly bears, they should also not be hunted there (which is hopefully within the Grizzly Bear Recovery Area, or should be). The Interagency Grizzly Bear Study Team has been collaring and studying bears there for decades, and some of the bears that they have collared, at least one, is a black grizzly. Contrary to what they have said in the past, these bears are not dark brown, seen in cloudy conditions or backlit, they are black even in bright sun, without any of the silvertip of other grizzlies. I've seen very large male (larger than what is acknowledged publicly, absolutely enormous, though seldom seen), females, and cubs of this type. Presumably cubs are in especial danger of being mistaken for ursus americanus and hunted because they haven't developed adult grizzly characteristics. It should be noted that the Interagency Grizzly Bear Study Team has at least one of these bears collared, I believe, which I've witnessed. Their denial would not negate the existence of these bears, which also have been sighted within Yellowstone Park in two locations by me personally over the years, once in very good light over several days. Outside the park I've seen such an individual over many years. Also, although grizzlies used to frequent the Taylor Fork during the spring, last year I had no sightings whatsoever during this season in this critical habitat. Where there used to be grizzly digging activity evident everywhere, there was almost none. There could be several causes. Increased presence of hunters looking for Ursus Americanus during this season (there are none there anymore, there used to be a many years ago, a decade or more) which scared the grizzlies out of there too, the removal of cattle from summer grazing leases because of increased regulation around streams which might have messed up the ecosystem somehow, altering the vegetation so it's no longer favorable to the moles or gophers that the grizzlies used to subsist on during the spring (what look like moles collect caches of what look somewhat like corn to horde underground, which the grizzlies excavate and presumably eat, along with the moles along the line of the melting snow, when the burrows are easy to dig and tunnels flooded, probably). So, perhaps this food source is also now gone, what with the cattle removed that might have been an equivalent replacement for bison that have been absent. Perhaps if bison are allowed to return to this area during the summer, under the governor's plan, this will no longer be a problem. However, I think less bison will be tolerated outside the park during the summer? There are much fewer elk because a different subspecies of wolf was introduced from northern Canada near the Yukon, so they are no longer grazing down the vegetation sufficiently, perhaps (it's very thick growth now, not grazed down at all, whether the open areas will even persist, which the grizzlies prefer, is a question). It should be noted, however, that last year was also an unusual snow year (peak of the sunset cycle, warmer, etc), so perhaps this accounted for it. Personally, I see a stronger correlation to sunspots than global warming. Other springs it has NOT been warm, snow well into the summer. Outside of these critical areas that caused recovery, it's up to Montana and the states to determine where the bears are acceptable, since they ARE dangerous and require careful management actions. However, without protection within the Recovery Area, they will not stay recovered, especially the very rare black grizzly color phase (like the Spirit or Kermode bear phase of Ursus Americanus found in the temperate rainforests of British Columbia).	Miscellaneous		FWS-R6-ES-2016-0042-0599	
The grizzly population recovery is important, predator species are so very important to the health of western ecosystems.	Miscellaneous	The delisting of the GYE grizzly bears is premature. The grizzly bear was listed in 1975, and saw large population growth and stabilization. It has been listed for forty-one years, and while there has been significant growth in the program, when considering the possible implications of climate change and hunting on the species, forty-one years is not long enough time of protection. In allowing the states to manage the GYE grizzly bear that will allow the GYE, a game species, to potentially be hunted. The proposed rule states that Idaho, Wyoming, and Montana have no current plans to allow the grizzly to be hunted, but that proposition will not last long. State fish and wildlife agencies are more pliable than the federal government, increased public pressure to hunt the bears will lead to state regulated hunting. The proposed rule outlines the perimeters for federal intervention and hunting allowances, but that outline is insufficient, because it does not consider the cumulative effects of climate change and hunting on the species. The proposed rule discusses the possible impacts of climate change on the species separate of direct human impacts. The proposed rules fails to view both of these large impacts congruently. The proposed rule states that the hunting allowances can be changed year to year, giving some flexibility to agency. But this flexibility may not be enough. A large fire or extreme drought stemming from climate change following hunting season could decimate the population, even if the following hunting season is cancelled. These two large population controls need to be consider in tandem. The grizzly population recovery is important, predator species are so very important to the health of western ecosystems. It is too soon to remove the grizzly bear, because the long term effects of climate change on the species is too unknown to open the species up to state management, where the possibly for large scale hunting is very high. Many in the west view predators as an issue, but that approach should not influence the delisting of the GYE grizzly, because the future effects of climate change are too unknown. Forty-one years of recovery should not be hastily dashed, because of public pressure on limiting predator species.	FWS-R6-ES-2016-0042-0591	
Are we willing to risk losing this keystone species from our ecosystem? According to David Suzuki, an award winning scientist and environmentalist, grizzly bears are "ecosystem engineers" and help regulate prey species, disperse seeds of many plants, and aerate soil when digging for roots and pine nuts. Dr. Stephen Herrero, a Canadian doctor of animal behavior and ecology reports; "Grizzly bears are indicators of sustainable development and when viable populations exist, the landscape is being managed sustainably."	Miscellaneous	It has come to my attention the U.S. Fish and Wildlife Service is proposing to remove grizzly bears in the Yellowstone Ecosystem from the Endangered Species List. Currently, the grizzly population in the lower 48 states is less than two percent of their pre-settlement population and they occupy such a small region in the Yellowstone Ecosystem. Their numbers are still small even though they were placed on the Endangered Species List and by delisting the grizzly population, they will be subject to trophy hunts, which will invariably give rise to their extinction. Are we willing to risk losing this keystone species from our ecosystem? According to David Suzuki, an award winning scientist and environmentalist, grizzly bears are "ecosystem engineers" and help regulate prey species, disperse seeds of many plants, and aerate soil when digging for roots and pine nuts. Dr. Stephen Herrero, a Canadian doctor of animal behavior and ecology reports; "Grizzly bears are indicators of sustainable development and when viable populations exist, the landscape is being managed sustainably." At this moment, our ecosystem which includes keystone species such as the grizzly bear are in peril. If we do not forecast and protect our ecosystem now, what species that exist today will be gone tomorrow. Please keep Greater Yellowstone grizzly bears on the Endangered Species List, not only to protect these iconic keystone species but also to sustain our ecosystem for generations to come.	FWS-R6-ES-2016-0042-0604	
Besides their inherent value as sentient beings, grizzly bears fulfill a vital role in their ecosystem and they provide tremendous value in the form of ecotourism. The vast majority of the U.S. only wants to see grizzly bears in the wild, not as wall hangings or floor rugs. It's your responsibility to protect these amazing animals, not to sell them for trophy hunting.	Miscellaneous	Besides their inherent value as sentient beings, grizzly bears fulfill a vital role in their ecosystem and they provide tremendous value in the form of ecotourism. The vast majority of the U.S. only wants to see grizzly bears in the wild, not as wall hangings or floor rugs. It's your responsibility to protect these amazing animals, not to sell them for trophy hunting. Additionally, the science is clear that delisting is premature and that grizzly bears have not fully recovered in the Greater Yellowstone Ecosystem. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupies an insignificant proportion of their pre-settlement range. If anything, grizzly bears need additional protections, not less. Please keep Greater Yellowstone grizzly bears on the Endangered Species List.	FWS-R6-ES-2016-0042-0644	

Travelers from all over the world visit the Yellowstone region in hopes of seeing and photographing the apex predators. That brings a lot of revenue into the local economies surrounding the Yellowstone region. It brings a lot of good will with it as well. Grizzly bears are not just a treasure of the state of Montana and the United States, they are a treasure of this planet and all of the people and children of future generations, and we need to start thinking in the bigger sense using an expanded perspective that we are the stewards of this planet and all the species who inhabit it.	Miscellaneous	Please do not remove (delist) the grizzly bear from the protections stated in the Endangered Species Act. Even though it may appear that the grizzly has met the standard for the delisting rule, which opens the door for legal hunting, that is not the appropriate means of population control. The long term effects of the proposed delist control measures are tenuous at best. Climate changes, temperature increases, loss of white bark pine and other critical habitat components are totally unpredictable and are happening exponentially faster than predicted or considered. The apex predators are unable to adapt to those changes and will all be lost within a very short period of time. In the mean time we need to do everything humanly possible to provide them a habitat that helps them make the necessary adjustments, if that will even be possible. Humans need to stay out of areas that the grizzly needs for survival. If a bear-human conflict should occur I want to see nonlethal means used, prior to lethal removal. Travelers from all over the world visit the Yellowstone region in hopes of seeing and photographing the apex predators. That brings a lot of revenue into the local economies surrounding the Yellowstone region. It brings a lot of good will with it as well. Grizzly bears are not just a treasure of the state of Montana and the United States, they are a treasure of this planet and all of the people and children of future generations, and we need to start thinking in the bigger sense using an expanded perspective that we are the stewards of this planet and all the species who inhabit it. Please do the right thing and do not delist the grizzly, and, do not allow hunting of it for at least (5) five years post-delisting. Thank you for considering my comments and concerns.	FWS-R6-ES-2016-0042-0614	
1--The voracious desire, most notably by surrounding states of Wyoming and Montana, to capitalize financially on trophy hunting.	Miscellaneous	As a lifelong resident of the Greater Yellowstone Ecosystem, and one who has worked directly with the Inter Agency Recovery Team over a span of many years, I strongly oppose the delisting the Grizzly bear. I join those who are concerned about: 1--The voracious desire, most notably by surrounding states of Wyoming and Montana, to capitalize financially on trophy hunting. 2--The under-studied repercussions of climate change and the impact on the bear's food supply. 3--Shrinking habitat, that is even now far too limited. 4--The unreasonable reliance of FWS on unreliable bear numbers. 5--The absence of corridors to permit grizzly migration. 6--The inability to forecast human caused bear mortality, that is only going to increase with development and population growth. The Yellowstone Grizzly is a national treasure. Removal from endangered/threatened status is trading that treasure for fool's gold. While it may be provide a boastful feather in the cap for FWS, it will prove to be one of the most ill-conceived proposals ever advanced by FWS.	FWS-R6-ES-2016-0042-0672	
41 Native American tribes have legally opposed delisting of grizzly bears but have been disrespected and ignored by Federal and State wildlife managers.	Miscellaneous	It is not time to delist the Greater Yellowstone population of Grizzly Bears. 1. The methods used to estimate the population and trend of grizzly bears is flawed and likely overestimates the true number of bears and their health. 2. Grizzly Bears currently occupy less than 1% of the former range and represent only 1% of the pre-European population. 3. The impacts of climate change and the loss of vital food sources jeopardize the limited recovery of grizzly bears in the GYE. 4. Delisting the Grizzly Bears will jeopardize the slight recovery we have seen because hostile State management focused on trophy hunting and the removal of bears that attempt to disperse out of the GYE would in all likelihood quickly reverse population gains and eliminate any possibility of connectivity between bear populations. 5. 41 Native American tribes have legally opposed delisting of grizzly bears but have been disrespected and ignored by Federal and State wildlife managers. 6. Those pushing for delisting are primarily private livestock ranchers. Yet, conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. 7. Future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat. 8. The protections of the Endangered Species Act are critical to the continued recovery of GYE grizzly bears and should stay in place for the foreseeable future.	FWS-R6-ES-2016-0042-0686	
If the Fish and Wildlife Service allows the killing of 70 bears each year, they could easily kill ALL of the black grizzlies in the Greater Yellowstone Ecosystem, and then some, which is absolutely beyond unbelievable, and I can say as a result I am barely able to function. It's ironic in the extreme that this is the legacy that this administration wants, when I voted democratic, I did so for environmental reasons and feel betrayed, honestly. You are talking about one of the most endangered predators on planet Earth. Grizzlies require very large home ranges, and much of the summer alpine habitat occurs outside the parks boundaries, areas like the rugged Taylor Hilgard mountains wilderness, a necessary stronghold of the grizzly bear. Grizzly bears can't stay recovered if there are not continued protections throughout the whole grizzly bear recovery area, and the entire Taylor Fork north of the park, if it's not in this grizzly bear recovery area like I believe that it is, needs to be incorporated into the recovery area, and no sport hunting of the bears there, they need a buffer around the core of Yellowstone Park, much of which is a caldera without as many higher peaks with white bark pine, cooler temps, cutworm moths, in general necessary varied habitat. I don't see any reason to alter this status quo that people are accustomed to. Outside of the recovery area, I'm going to surprise you, I think the states should be able to use their judgement, with perhaps expansion of the recovery area north slightly through the Taylor Hilgards, perhaps. I've heard, anecdotally, actually, that some of the best habitat and densest populations of grizzlies anywhere, and there must be a grain of truth to it, is just near the Yellowstone Club, presumably just south, so it wouldn't make sense to jeopardize grizzlies here where they thrive south of this resort. Like I said, outside of the recovery area, I think the states should be able to use their judgement for managing the bears. Within the Grizzly Bear Recovery Area, I think the focus should be not on sport hunting, but more targeted removal of problem bears. Bears have their own unique personalities and dispositions, I'm not talking about bears that are tolerant of people and not threatening. I've had no problems whatsoever from an ear tagged bear with an orange earring, for example. Focus on managing the bears for public safety, which is much more important than randomly shooting them within the recovery area. Make it safer instead of killing the rarest bears on EARTH that cause no problems for anyone!!!!!!!Beyond the recovery area, I have to admit, as a person that's had one too many close calls, it's nice to have areas to go hike without worrying, say the Spanish Peaks wilderness. It's not all or nothing. That's the problem with environmentalism these days. Why am I saying this? Because I don't subscribe to the idea that Yellowstone is anything other than an island of habitat. In fact, that's why the bears are unique, they are isolated, and they should remain that way to stay that way. That's why they need a larger habitat than Yellowstone, whose boundaries are mostly designed to encompass thermal features (though they missed a few north of Gardiner, if you ask me, which I think should be included, next to the river, which would have solved the need for low altitude wintering grounds too, perhaps the Church Universal and Triumphant will give it back). Yellowstone needs the mountainous areas just outside its boundaries as a core area of protection for the grizzlies within the recovery area, I can't emphasize that enough. If you look at the northwest corner of the park, which includes such territory, like Fawn Pass, you will know what I mean. This is where grizzly bears go during the summer months. So, if the protections are maintained in the Grizzly Recovery Area, I have no quarrel. If not, for the love of God, get the black grizzlies out of there, transplant them somewhere else, let them have a founder effect elsewhere in the Cabinet mountains or something, where all 10 of them could be endangered for perpetuity, with full protections. Dart them, helicopter them out. Seriously. We always here about the most endangered animals on earth in other countries, and yet don't lift a finger for them here. I don't get it. At all. Yet we shut down industry across the whole country for the same reason which could probably be protected in one very small reserve somewhere and still support 700, but don't do anything about the status quo with the	Miscellaneous	If the Fish and Wildlife Service allows the killing of 70 bears each year, they could easily kill ALL of the black grizzlies in the Greater Yellowstone Ecosystem, and then some, which is absolutely beyond unbelievable, and I can say as a result I am barely able to function. It's ironic in the extreme that this is the legacy that this administration wants, when I voted democratic, I did so for environmental reasons and feel betrayed, honestly. You are talking about one of the most endangered predators on planet Earth. Grizzlies require very large home ranges, and much of the summer alpine habitat occurs outside the parks boundaries, areas like the rugged Taylor Hilgard mountains wilderness, a necessary stronghold of the grizzly bear. Grizzly bears can't stay recovered if there are not continued protections throughout the whole grizzly bear recovery area, and the entire Taylor Fork north of the park, if it's not in this grizzly bear recovery area like I believe that it is, needs to be incorporated into the recovery area, and no sport hunting of the bears there, they need a buffer around the core of Yellowstone Park, much of which is a caldera without as many higher peaks with white bark pine, cooler temps, cutworm moths, in general necessary varied habitat. I don't see any reason to alter this status quo that people are accustomed to. Outside of the recovery area, I'm going to surprise you, I think the states should be able to use their judgement, with perhaps expansion of the recovery area north slightly through the Taylor Hilgards, perhaps. I've heard, anecdotally, actually, that some of the best habitat and densest populations of grizzlies anywhere, and there must be a grain of truth to it, is just near the Yellowstone Club, presumably just south, so it wouldn't make sense to jeopardize grizzlies here where they thrive south of this resort. Like I said, outside of the recovery area, I think the states should be able to use their judgement for managing the bears. Within the Grizzly Bear Recovery Area, I think the focus should be not on sport hunting, but more targeted removal of problem bears. Bears have their own unique personalities and dispositions, I'm not talking about bears that are tolerant of people and not threatening. I've had no problems whatsoever from an ear tagged bear with an orange earring, for example. Focus on managing the bears for public safety, which is much more important than randomly shooting them within the recovery area. Make it safer instead of killing the rarest bears on EARTH that cause no problems for anyone!!!!!!!Beyond the recovery area, I have to admit, as a person that's had one too many close calls, it's nice to have areas to go hike without worrying, say the Spanish Peaks wilderness. It's not all or nothing. That's the problem with environmentalism these days. Why am I saying this? Because I don't subscribe to the idea that Yellowstone is anything other than an island of habitat. In fact, that's why the bears are unique, they are isolated, and they should remain that way to stay that way. That's why they need a larger habitat than Yellowstone, whose boundaries are mostly designed to encompass thermal features (though they missed a few north of Gardiner, if you ask me, which I think should be included, next to the river, which would have solved the need for low altitude wintering grounds too, perhaps the Church Universal and Triumphant will give it back). Yellowstone needs the mountainous areas just outside its boundaries as a core area of protection for the grizzlies within the recovery area, I can't emphasize that enough. If you look at the northwest corner of the park, which includes such territory, like Fawn Pass, you will know what I mean. This is where grizzly bears go during the summer months. So, if the protections are maintained in the Grizzly Recovery Area, I have no quarrel. If not, for the love of God, get the black grizzlies out of there, transplant them somewhere else, let them have a founder effect elsewhere in the Cabinet mountains or something, where all 10 of them could be endangered for perpetuity, with full protections. Dart them, helicopter them out. Seriously. We always here about the most endangered animals on earth in other countries, and yet don't lift a finger for them here. I don't get it. At all. Yet we shut down industry across the whole country for the same reason which could probably be protected in one very small reserve somewhere and still support 700, but don't do anything about the status quo with the	FWS-R6-ES-2016-0042-0609	

I would expect that WY G&F would realize that 2/3 of the people are against hunting bears of any type for trophies. The value in the grizzly population within the YNP and GYE is in the tourist dollars that flood the state each years.	Miscellaneous	Do not delist the Grizzly Bear within the Greater Yellowstone Ecosystem - they are just recovering. They need more time! I am a yearly (sometimes multiple times throughout the year) visitor to the beautiful state of Wyoming. Between 2015 and this year so far, I am finding it more difficult to support tourism and bring my family out from NH due to the continued disregard for apex predators/species in your state. To propose the delisting of the Grizzly bear is simply mind boggling. It seems that just as soon as a species has "recovered enough" that your G&F wants to institute open season. Grizzly bears are one of several iconic species, along with wolves and bison, of the Yellowstone National Park and it's entire ecosystem that often spans outside the park boundaries. I would expect that WY G&F would realize that 2/3 of the people are against hunting bears of any type for trophies. The value in the grizzly population within the YNP and GYE is in the tourist dollars that flood the state each years. With visits to YNP and other National Parks on the rise each years, the proposed delisting and subsequent hunt is simply ludicrous and goes against the majority of public opinion nationwide. Trophy Hunting is Not Cool and Disrespects the Animals Hunted! My kids have said that they would not like to go back to WY (or MT) or to Yellowstone if killing grizzlies becomes legal. Even my 14 yr. old twin boys understand the value of these bears and the impact they have on the ecosystem and the tourism. Most importantly, they don't believe in killing what you aren't intending to eat. Who's a Mama Bear? One of my other concerns is the killing of a mama bear. How will hunters be 100% able to distinguish a mama bear who is actively nursing and/or taking care of cubs? The won't. The chance of creating a who generation of orphaned cubs is quite high indeed. I find this possibility heartbreaking and needless. Hunters and trappers would probably call me a tree-hugger even though they don't know whether my family hunts or not; we do in fact but only deer or turkey (we are in NH) because these are animals that we can eat and that are in abundance. I ask that WY G&F take my comments, as a tourist - someone who spends thousands of dollars each year in WY - seriously and consider that I am not alone in opposing the delisting of the Grizzly Bear. If delisting occurs, the pressuer to open a hunt will be merciless and the hunting lobby unrelenting. Please. Now is not the time to delist Grizzlies! Thank You!	FWS-R6-ES-2016-0042-0723	
Grizzly bears are also a positive economic driver, bringing much more revenue to Wyoming from people who want to see these majestic animals alive and in the wild, rather than through hunting tags. If grizzly bears in the Yellowstone region are delisted, Wyoming plans to initiate a sport trophy hunt.	Miscellaneous	I live in Jackson, WY and regularly hike and enjoy the wildlife in the Grand Teton National Park and Yellowstone National Park. Removing the grizzly bear from the federal list of endangered and threatened wildlife is a step backward in grizzly recovery, and will result in a smaller grizzly bear population over a smaller area than exists today. Grizzly bears are also a positive economic driver, bringing much more revenue to Wyoming from people who want to see these majestic animals alive and in the wild, rather than through hunting tags. If grizzly bears in the Yellowstone region are delisted, Wyoming plans to initiate a sport trophy hunt. Fifty Native American tribes and many other people are opposed to trophy hunting of grizzly bears. Given how slowly bears reproduce, the current proposal to allow Wyoming and the other states to exceed the maximum number of bear deaths for several years before even initiating a review could mean that the population is in steep decline before any emergency action can be taken. Instead of promoting and implementing proven co-existence methods to reduce conflicts between bears, livestock, and people, Wyoming plans to aggressively manage bears, including potentially killing them pre-emptively. This is an unacceptable and counterintuitive action that the Fish and Wildlife Service absolutely should not undertake.	FWS-R6-ES-2016-0042-0741	
Fifty Native American tribes and many other people are opposed to trophy hunting of grizzly bears.	Miscellaneous	I live in Jackson, WY and regularly hike and enjoy the wildlife in the Grand Teton National Park and Yellowstone National Park. Removing the grizzly bear from the federal list of endangered and threatened wildlife is a step backward in grizzly recovery, and will result in a smaller grizzly bear population over a smaller area than exists today. Grizzly bears are also a positive economic driver, bringing much more revenue to Wyoming from people who want to see these majestic animals alive and in the wild, rather than through hunting tags. If grizzly bears in the Yellowstone region are delisted, Wyoming plans to initiate a sport trophy hunt. Fifty Native American tribes and many other people are opposed to trophy hunting of grizzly bears. Given how slowly bears reproduce, the current proposal to allow Wyoming and the other states to exceed the maximum number of bear deaths for several years before even initiating a review could mean that the population is in steep decline before any emergency action can be taken. Instead of promoting and implementing proven co-existence methods to reduce conflicts between bears, livestock, and people, Wyoming plans to aggressively manage bears, including potentially killing them pre-emptively. This is an unacceptable and counterintuitive action that the Fish and Wildlife Service absolutely should not undertake.	FWS-R6-ES-2016-0042-0741	
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Predators play an overwhelmingly important role in the health of our ecosystems. However, throughout the history of the United States, our government and the general public have fostered a deep seated fear and demonization of predators, especially the large predators. This is evidenced by the near eradication of the Grizzly Bear and wolves and the widespread hatred of an essential species. Fear of predators has been institutionalized and the elimination of predators sold as a necessary program to protect protect livestock, and the western way of life. However, it doesn't take much effort to see the damage that such programs have on our ecosystems and the other problems that arise when predators are reduced to unsustainable population levels.	Miscellaneous	Removing the Grizzly Bear from the endangered species list is a mistake that will ensure the need to relist this magnificent predator. I believe that the decision is not based on sound scientific information, but rather on the pressure of political entities. Because it is not defensible to make such important decisions based on political pressure, science is manipulated and misinterpreted to develop convenient findings to support the political decision. Predators play an overwhelmingly important role in the health of our ecosystems. However, throughout the history of the United States, our government and the general public have fostered a deep seated fear and demonization of predators, especially the large predators. This is evidenced by the near eradication of the Grizzly Bear and wolves and the widespread hatred of an essential species. Fear of predators has been institutionalized and the elimination of predators sold as a necessary program to protect protect livestock, and the western way of life. However, it doesn't take much effort to see the damage that such programs have on our ecosystems and the other problems that arise when predators are reduced to unsustainable population levels. Wildlife management decisions are too often based on the need to generate revenue and a perceived notion that large predators diminish our enjoyment of hunting big game species such as mule deer, elk. Certainly predators kill these species, but if we would allow the natural cycles of predators and game species to occur, we would find that our hunting would improve over time. We have created a hunger for revenue generated by the marketing of permits to kill large predators such as Grizzlies. What could stoke the prestige and ego more than shooting an evil killing machine as notorious as the Grizzly. Unfortunately, wildlife management decisions regarding the hunting of predators are often made with incomplete knowledge about the numbers of animals, the limiting effects of diminished habitat and the isolation of specie populations. Certainly climate change is having a negative impact on our wildlife but the political nature of this type of environmental deterioration is not taken into account. It is no secret that changing winter conditions in the northern Rockies is having a devastating impact on our forests. I have seen a significant change in the overall health of forests in the Sawtooth Mountains in Idaho. Most people might be surprised that a vital source of nourishment for the carnivorous beast, the Grizzly Bear, are pine nuts. Climate change has led to the rapid decline of the white bark pine and its production of nuts which are essential to the Grizzly. Wildlife managers have not given this fact enough weight in their decision making. After all, Grizzlies are carnivores, living by eating our precious game animals. Well, it is not so easy to replace an essential food source as important as the white bark pine nut is to the Grizzly. Imagine the impact on our food options if corn or wheat production was drastically reduced by some disease. Other important sources of nourishment for the Grizzlies are also experiencing declines putting further pressure on Grizzly survival. There really aren't that many Grizzlies in the Yellowstone area. Certainly many think that there are way too many and that hunting will help keep their populations in check. The resurgence of the Grizzly Bear over the past decades has been significant and credit must be given to the federal government for this. But Grizzly Bear population is currently declining. Maybe this is part of a natural cycle and if left alone, their numbers will recover. But with all of the current environmental pressures, making the decision to de-list the Grizzly Bear will rapidly hasten the declining numbers. The Yellowstone ecosystem is in many ways a geographical island. Genetic diversity is essential for the sustainability of healthy species. Because of the relative isolation of large predators such as Grizzlies in Yellowstone, it is difficult to maintain a diverse gene pool. Hunting outside of the Park will make it even more difficult, adding another significant constraint on the sustainability of a healthy Grizzly Bear population. Although the Grizzly Bear population has grown over time and can be trumpeted as a successful conservation effort, de-listing the Grizzly Bear at this time will rapidly destroy that legacy and put one of our largest predators in unnecessary peril and fighting for survival. Thank you for your consideration.	FWS-R6-ES-2016-0042-0750	
The grizzly is iconic, necessary to the habitat, and is still in an adjustment phase of accommodating the impact of the pine bark beetle infestation.	Miscellaneous	I strongly oppose delisting the grizzly bear as an endangered species with the GYA. Any credible evidence about the subject, that I have researched, concludes that the process of delisting is premature. Certainty must prevail in contemplating such action. The grizzly is iconic, necessary to the habitat, and is still in an adjustment phase of accommodating the impact of the pine bark beetle infestation. I will add that it is the case that wildlife watching has overtaken the combined value of hunting and fishing as the greatest engine of our area's economy. Grizzlies are one of the top attractions for our area's visitors.	FWS-R6-ES-2016-0042-0758	
I will add that it is the case that wildlife watching has overtaken the combined value of hunting and fishing as the greatest engine of our area's economy.	Miscellaneous	I strongly oppose delisting the grizzly bear as an endangered species with the GYA. Any credible evidence about the subject, that I have researched, concludes that the process of delisting is premature. Certainty must prevail in contemplating such action. The grizzly is iconic, necessary to the habitat, and is still in an adjustment phase of accommodating the impact of the pine bark beetle infestation. I will add that it is the case that wildlife watching has overtaken the combined value of hunting and fishing as the greatest engine of our area's economy. Grizzlies are one of the top attractions for our area's visitors.	FWS-R6-ES-2016-0042-0758	
Many will argue differently, but I believe that our "isolated" population of grizzlies has recovered; albeit tenuously, and I don't have a problem with the delisting. The problem is, as the delisting of the wolves demonstrated; a hunting season for grizzlies will soon follow. I believe a hunting season is a freight train coming at us we can't stop! Managing grizzly bears for the Game and Fish departments is expensive, and they desire to recoup some expense with grizzly bear hunting tags, but their real savings will be the killing of bears. All we can do is hope to mitigate the outcome by providing a firewall, a fall back zone where the grizzlies will never be hunted, an incubator of sorts. Social tolerance" is the term used by grizzly managers when considering the human factor intersect. Social acceptance is a tough sell for those who fear predators might hurt their children along the wildland-urban interface; grizzly advocates must understand this as we move forward with our mitigative efforts to insure a long-term grizzly recovery. If the residents on the outskirts of our towns and ranchers along the periphery of your National Forests can protect their property, social acceptance for grizzlies in our wild areas will grow. If people keep getting attacked outside Livingston, and grizzlies are harvesting apples in St. Anthony, or trying to den in garages in Driggs, social tolerance will shrink. We need to cultivate social tolerance, not risk it. My social tolerance for grizzlies is high because I have one of the 155+ easily discernable jobs created by grizzly bear tourism. I consider them "Revenue Bears," Game and Fish doesn't. Every hotel and restaurant of the Greater Yellowstone communities are beneficiaries of "Revenue Bear" tourism. I wish we wouldn't have a hunt, but as a pragmatist, I don't have a problem with a limited hunting season for the grizzly bears. Our Wyoming, Idaho and Montana Game and Fish departments who are also part of the IGBC, will argue that Yellowstone and Grand Teton Parks are the safety zone firewall that will protect the grizzlies. I counter point; if Yellowstone and Grand Teton Parks could protect them, why did the population crash to start with? That is why the alphabet soup of agencies of the IGBC in 1993 created the more logical and demonstrably effective "Grizzly Bear Recovery Zone"; known today as the "Primary Conservation Area (PCA)." The PCA has fostered the glacial pace yet successful recovery we enjoy today. This Primary Conservation Area is 9,210 square miles equaling 5,893,760 acres. This original "Grizzly Bear Recovery Zone" has to be the firewall "no hunting zone" to insure the "continuity of achievement" of the Grizzly Bear Recovery effort.	Miscellaneous	The delisting of the Yellowstone Grizzly Bear is imminent and this we should celebrate ("dancing"). Now that our happy dance is complete, we must insure the grizzlies' recovery is permanent. To insure "continuity of achievement," the grizzlies need a firewall to protect the success of this achievement from human foible. Many will argue differently, but I believe that our "isolated" population of grizzlies has recovered; albeit tenuously, and I don't have a problem with the delisting. The problem is, as the delisting of the wolves demonstrated; a hunting season for grizzlies will soon follow. I believe a hunting season is a freight train coming at us we can't stop! Managing grizzly bears for the Game and Fish departments is expensive, and they desire to recoup some expense with grizzly bear hunting tags, but their real savings will be the killing of bears. All we can do is hope to mitigate the outcome by providing a firewall, a fall back zone where the grizzlies will never be hunted, an incubator of sorts. Social tolerance" is the term used by grizzly managers when considering the human factor intersect. Social acceptance is a tough sell for those who fear predators might hurt their children along the wildland-urban interface; grizzly advocates must understand this as we move forward with our mitigative efforts to insure a long-term grizzly recovery. If the residents on the outskirts of our towns and ranchers along the periphery of your National Forests can protect their property, social acceptance for grizzlies in our wild areas will grow. If people keep getting attacked outside Livingston, and grizzlies are harvesting apples in St. Anthony, or trying to den in garages in Driggs, social tolerance will shrink. We need to cultivate social tolerance, not risk it. My social tolerance for grizzlies is high because I have one of the 155+ easily discernable jobs created by grizzly bear tourism. I consider them "Revenue Bears," Game and Fish doesn't. Every hotel and restaurant of the Greater Yellowstone communities are beneficiaries of "Revenue Bear" tourism. I wish we wouldn't have a hunt, but as a pragmatist, I don't have a problem with a limited hunting season for the grizzly bears. Our Wyoming, Idaho and Montana Game and Fish departments who are also part of the IGBC, will argue that Yellowstone and Grand Teton Parks are the safety zone firewall that will protect the grizzlies. I counter point; if Yellowstone and Grand Teton Parks could protect them, why did the population crash to start with? That is why the alphabet soup of agencies of the IGBC in 1993 created the more logical and demonstrably effective "Grizzly Bear Recovery Zone"; known today as the "Primary Conservation Area (PCA)." The PCA has fostered the glacial pace yet successful recovery we enjoy today. This Primary Conservation Area is 9,210 square miles equaling 5,893,760 acres. This original "Grizzly Bear Recovery Zone" has to be the firewall "no hunting zone" to insure the "continuity of achievement" of the Grizzly Bear Recovery effort. Wyoming Game and Fish thinks 7,229 square miles equaling 4,626,560 acres is adequate. "I'm sure Montana and Idaho Game and Fish agree. Clearly that would infringe on the range the Grizzly Recovery efforts deemed important essential recovery habitat. The IGBC Recovery Plan states; The PCA contains "The Minimum" seasonal habitat components needed to support the recovered grizzly bear population, as defined in the Recovery Plan. "A recovered population is one having a high probability of existence into the foreseeable future (greater than 100 years)." (Note) This statement in the recovery plan was drafted before the crash of the essential food sources, white bark pine and the Yellowstone cutthroat trout populations. The U.S. Fish and Wildlife Service are also part of the IGBC, whose mission statement says; "Work with others to conserve, protect and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people." However upon grizzly delisting the U.S. Fish and Wildlife Service is inclined to capitulate to "states rights" putting the future of grizzlies in the hands of those who find them a nuisance and expensive; hence, rendering their mission statement meaningless. We hold these grizzly truths to be self-evident; hence, for the Interagency Grizzly Bear Study Team's, team members, the Wyoming Game and Fish, Montana Game and Fish and Idaho Game and Fish to institute a hunting season within the boundaries of the "Primary	FWS-R6-ES-2016-0042-0787	

By removing the grizzly bears from the list, we would be removing a dominant species in the ecosystem. Other parts of their ecosystem will be harmed. Grizzlies are known to be omnivore, which signifies that a major removal of the grizzly population may alter many different types of plants, which could then harm other wildlife that are part of this ecosystem.	Miscellaneous	Delisting the grizzly bears of the Greater Yellowstone Ecosystem can cause harm to the species. It has taken decades for the species to increase from a population of just over a hundred, to around 700. The increase in the number of grizzly bears may seem substantial, but it does not compare to the amount of grizzlies that roamed before they began to be hunted in the 1800s. The grizzly bears should remain on the Endangered Species List until their numbers increase to an amount that can be considered self-sustaining. Removing them from the list at this point would require significant monitoring and regulations that are already being implemented by the Endangered Species Act. The risks for the survival of the species increase when we consider that grizzlies are one of the slowest reproducing mammals. They typically do not reproduce until they are at least 4 or 5 years old. Grizzlies do not mate until the months between May and July. The female has to ensure that she gains enough weight during the summer so that the implantation of their eggs in the uterus occur between October and November. If she does not gain enough weight, the implantation may not occur. If the female is able to implant her eggs, then she will carry the cubs and give birth to an average of about 2-3 cubs. If hunting is made possible again there might be fewer grizzlies being born than the amount of number of grizzlies that are being killed. By removing the grizzly bears from the list, we would be removing a dominant species in the ecosystem. Other parts of their ecosystem will be harmed. Grizzlies are known to be omnivore, which signifies that a major removal of the grizzly population may alter many different types of plants, which could then harm other wildlife that are part of this ecosystem. If the grizzlies can be hunted outside of the national parks, we are placing the grizzlies that live outside of the parks in danger. States like Montana, Idaho, and Wyoming would have to manage their hunting regulations. The individuals in the states might ignore rules and regulations, and this might cause the population of grizzlies to decline rapidly. We would then be left where we initially were, adding the grizzly bear species to the Endangered Species List. Instead, the communities that surround the living areas of the grizzlies should be educated about the importance of keeping this species alive. They should be educated about techniques that they can use when they come across grizzly bears. Once an animal is placed on the endangered species list, even if the animal population recovers to a certain degree, hunting it should not be allowed again.	FWS-R6-ES-2016-0042-0784	
The grizzly bear is a major driver of the Northern Rocky Mountain economy.	Miscellaneous	See Attached Attachments Cardori Zachary	FWS-R6-ES-2016-0042-1139	
Grizzly bears are a premier wildlife attraction for visitors to YELL, GRTE and JODR; and those visitors bring tens of millions of dollars into the regionaleconomy. The bears contribute to the publicâ€™s enjoyment and sense of pride in our conservation heritage. We seek to ensure that any future grizzly bear harvests within the GYE be conducted in a manner that: 1) respects the NPS mission; 2) protects regional economic benefits and the enjoyment of bear watching; 3) reduces the risks associated with wounded bears entering NPS units; and 4) limits the likelihood that well-known or transboundary bears will be harvested.	Miscellaneous	United States Department of the Interior 21-A» NATIONAL PARK SERVICE 366e1366eA'E INTERMOUNTAIN REGION A-1. , A» 12795 West Alameda Parkway (L.P.O. Box 25287 Denver, Colorado 80225-0287 ru REPLY REFER ro; May 10, 2016 VIA ELECTRONIC MAIL 36e" NO HARD COPY TO FOLLOW MemorandumTo: Director, U.S. Fish & Wildlife Service From: Intermountain Regional Director, National Park Service Subject: NPS Comments on Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife and Final Draft 2016 Conservation Strategy, Docket ID: FWS-R66C"ES-2016-0042 The National Park Service (NPS) appreciates the opportunity to provide comments on the Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife and the associated draft Conservation Strategy. The attached review comments were prepared by staff from Yellowstone National Park (YELL), Grand Teton National Park (GRTE), John D. Rockefeller Jr. Memorial Parkway (JODR), and NPS Regional and Washington Offices. NPS reviewers noted that the U.S. Fish and Wildlife Service (USFWS) has done an excellent job of structuring the argument for delisting of the Greater Yellowstone Ecosystem (GYE) population of grizzly bears and that the state of the science is well presented. Upon delisting of the GYE grizzly bear, the states of Wyoming, Montana, and Idaho along with the NPS, U.S. Forest Service (USFS), Bureau of Land Management (BLM) and tribes will collectively co-manage this species and habitat within the identified Demographic Monitoring Area (DMA). This will require careful coordination and collaboration to effectively manage bears which do not recognize jurisdictional boundaries. The NPS is committed to working closely and collaboratively with the USFWS and our other partners to develop and implement a cooperative management framework for this wide-ranging species while recognizing and respecting each partnerâ€™s jurisdiction, mission, values and interests. The NPS continues to focus on supporting the delisting process while trying to ensure values of the NPS are considered in management strategies and actions. Grizzly bears are a premier wildlife attraction for visitors to YELL, GRTE and JODR; and those visitors bring tens of millions of dollars into the regional economy. The bears contribute to the publicâ€™s enjoyment and sense of pride in our conservation heritage. We seek to ensure that any future grizzly bear harvests within the GYE be conducted in a manner that: 1) respects the NPS mission; 2) protects regional economic benefits and the enjoyment of bear watching; 3) reduces the risks associated with wounded bears entering NPS units; and 4) limits the likelihood that well-known or transboundary bears will be harvested. The attached NPS comments on the Proposed Rule and draft Conservation Strategy reflect many of the same key issues or themes that the NPS raised during the April 2016 Interagency Grizzly Bear Committee 36C" Yellowstone Ecosystem Subcommittee (IGBC-YES) meeting in West Yellowstone and during the September 2015 interagency meeting in Idaho Falls. Those key issues include: 1. If, after delisting, the decision is made to hunt grizzly bears, NPS is requesting that states focus the majority of future grizzly bear harvests away from park boundaries. In addition, NPS is requesting that harvests be focused in areas where human-bear conflicts are prevalent. 2. NPS is requesting that NPS representatives be included in the discussions and contribute to the development of recommendations during the annual meetings referred to in the draft Memorandum of Agreement (MOA) among the three states, recognizing that the decisions made during these meetings ultimately inform the discretionary mortality allocation by the states. 3. NPS is requesting that the Proposed Rule, Conservation Strategy, state management plans and other related documents identify the John D. Rockefeller, Jr. Memorial Parkway (JODR) as one of the three national park units in the GYE where hunting will not be permitted. 4. NPS is requesting that if a new estimation model other than Chao2 is used in the future, the states will recalibrate the population thresholds (i.e., minimum and average numbers of bears) and proportions of allocated hunter harvest based on the estimator provided by the new.	FWS-R6-ES-2016-0042-5325	
The proposal touts its science based decision making. With bears in particular there are other important factors as they are a truly iconic species. Native American culture is not even a consideration. This relates particularly to trophy hunting an animal that is considered a great spirit and a "brother" by many tribes. In short this is not just a numbers game. There is a humanity aspect to what is being proposed.	Miscellaneous	See Attached Attachments Patten Eva	FWS-R6-ES-2016-0042-1227	

The concept of social sustainability as Littig and Griebler (2005), "signifies the nature-society relationships, mediated by work, as well as relationships within the society." They expound that social sustainability can be reached if the work done "within a society" meets the criteria to "satisfy an extended set of human needs, and are shaped in a way that nature and its reproductive capabilities are preserved over a long period of time and the normative claims of social justice, human dignity and participation are fulfilled (p. 72). These complicated and multifaceted issues are often referenced as the pillar models of sustainable development. Littig and Griebler (2005) define each dimension and explain the logistics. In the multi-pillar or three pillars model, they explain how the three pillars - ecological, economic, and social - must be balanced if sustainability is to be reached. In their definition of the one-pillar model, it is explained that the ecological dimension takes precedent, but they conclude that, "human needs cannot be sufficiently met just by providing an ecologically stable and healthy environment, but that if a society is indeed committed to sustainability the equally legitimate social and cultural needs ought to be taken care of as well" (pg. 67). Therefore, perhaps the most useful definition of sustainability focuses on balance and compromise - that all aspects must be considered, and no one group or aspect is more important than another when trying to achieve sustainability. Lee (1993) would add that "sustainability is a goal, like liberty or equality: not a fixed end point to be reached but a direction that guides constructive change" (p. 563). A useful definition of sustainability that the authors Vucetich and Nelson (2013) reach is, "meeting human needs in a socially-just manner without depriving ecosystems of their health (or populations of their viability)" (p. 12). All of these definitions have the concepts of balance, compromise, and equality in common. The problem with "sustainability" is that our terminology will almost always need to be modified. If we are to understand that language is fluid, the dynamic tendencies of human behavior will always need to be reviewed. It is becoming clear that "sustainable development" is already a buzzword in community planning - or perhaps another "figleaf". But it is yet unclear if any of this new environmentally-conscious development is truly sustainable, or if simply our mere existence and reproduction on this planet is sustainable. It is also uncertain if the compromise and balance used to define sustainability is truly a 50-50 split between humans and the environment; is there one half of this equation that gets less than half of the benefit consistently over time? How does that impact the result? Therefore, sustainability may, over time, prove to take on new meaning as we "do the work within society". As Leopold, (1949) pointed out, "A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise" (p. 224). <i>How is removing the greater Yellowstone Grizzly bears attract tourists from all around the world to this part of the country. Numerous studies have quantified the substantial value of ecotourism to the economies of Greater Yellowstone communities. For those of us lucky enough to live in this area, sharing the mountains and plains with this magnificent animal enriches our lives. With minor adaptations to our behavior, we can easily accommodate grizzlies in more parts of the mountain west.</i>	Miscellaneous	The concept of social sustainability as Littig and Griebler (2005), "signifies the nature-society relationships, mediated by work, as well as relationships within the society." They expound that social sustainability can be reached if the work done "within a society" meets the criteria to "satisfy an extended set of human needs, and are shaped in a way that nature and its reproductive capabilities are preserved over a long period of time and the normative claims of social justice, human dignity and participation are fulfilled (p. 72). These complicated and multifaceted issues are often referenced as the pillar models of sustainable development. Littig and Griebler (2005) define each dimension and explain the logistics. In the multi-pillar or three pillars model, they explain how the three pillars - ecological, economic, and social - must be balanced if sustainability is to be reached. In their definition of the one-pillar model, it is explained that the ecological dimension takes precedent, but they conclude that, "human needs cannot be sufficiently met just by providing an ecologically stable and healthy environment, but that if a society is indeed committed to sustainability the equally legitimate social and cultural needs ought to be taken care of as well" (pg. 67). Therefore, perhaps the most useful definition of sustainability focuses on balance and compromise - that all aspects must be considered, and no one group or aspect is more important than another when trying to achieve sustainability. Lee (1993) would add that "sustainability is a goal, like liberty or equality: not a fixed end point to be reached but a direction that guides constructive change" (p. 563). A useful definition of sustainability that the authors Vucetich and Nelson (2013) reach is, "meeting human needs in a socially-just manner without depriving ecosystems of their health (or populations of their viability)" (p. 12). All of these definitions have the concepts of balance, compromise, and equality in common. The problem with "sustainability" is that our terminology will almost always need to be modified. If we are to understand that language is fluid, the dynamic tendencies of human behavior will always need to be reviewed. It is becoming clear that "sustainable development" is already a buzzword in community planning - or perhaps another "figleaf". But it is yet unclear if any of this new environmentally-conscious development is truly sustainable, or if simply our mere existence and reproduction on this planet is sustainable. It is also uncertain if the compromise and balance used to define sustainability is truly a 50-50 split between humans and the environment; is there one half of this equation that gets less than half of the benefit consistently over time? How does that impact the result? Therefore, sustainability may, over time, prove to take on new meaning as we "do the work within society". As Leopold, (1949) pointed out, "A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise" (p. 224). <i>How is removing the greater Yellowstone Grizzly bears attract tourists from all around the world to this part of the country. Numerous studies have quantified the substantial value of ecotourism to the economies of Greater Yellowstone communities. For those of us lucky enough to live in this area, sharing the mountains and plains with this magnificent animal enriches our lives. With minor adaptations to our behavior, we can easily accommodate grizzlies in more parts of the mountain west.</i>	FWS-R6-ES-2016-0042-1242	
	Miscellaneous	See Attached Attachments Weiner Gary	FWS-R6-ES-2016-0042-1229	ecotourism
Hundreds of thousands of visitors pay top dollar to visit the park, with the hope of seeing a Grizzly as one of the motivators. But with only approximately 2000 bears left, the chance of sightings will no doubt be reduced greatly after the handful of Trophy Hunters start claiming their vainglorious prizes.	Miscellaneous	Ridiculous idea to remove the Grizzly Bear from the Federal List of Endangered Species in Yellowstone. Hundreds of thousands of visitors pay top dollar to visit the park, with the hope of seeing a Grizzly as one of the motivators. But with only approximately 2000 bears left, the chance of sightings will no doubt be reduced greatly after the handful of Trophy Hunters start claiming their vainglorious prizes. Propagating plants is a lot easier than re-establishing the depleted Grizzly population.	FWS-R6-ES-2016-0042-1313	
41 Native American tribes have legally opposed delisting of x grizzly bears but have been disrespected and ignored by Federal and State wildlife managers .	Miscellaneous	I oppose the delisting of Grizzly Bears on the following grounds: 41 Native American tribes have legally opposed delisting of grizzly bears but have been disrespected and ignored by Federal and State wildlife managers. Conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat.	FWS-R6-ES-2016-0042-1359	
The species is not subject to overutilization by humans, but represents an important keystone species, especially in the Greater Yellowstone region. Grizzlies and wolves have been deemed the main attractions in the park, and the rising nature related tourism is worth \$1 billion annually. We currently utilize the bear population for profit in an eco-friendly and manageable way. Delisting the bears would threaten the ecotourism balance we have just acquired in the past decade.	Miscellaneous	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	Ecotourism
Grizzly bears require a large territory, so the obvious deterrent is human's negligent use of space and inability to interact peacefully with the wildlife in the surrounding areas. If delisted, humans and their use of the land will only provide more of a barrier to grizzly bear movement and population growth.	Miscellaneous	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	Human encroachment.
Additional studies within Grand Teton National Park showed that the removal of Grizzly bears and wolves caused populations of herbivores to increase, decreasing the density of plants and decreasing the population of migratory birds.	Miscellaneous	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	Population management for other species.
Do we really want to make the same mistake as we did with the wolves in Yellowstone? Can we afford to spend that money, time and manpower it will require to reinstate our perilous balance?	Miscellaneous	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	
over 36 Native American tribes- including those in the Yellowstone regionsigned a petition against delisting.	Miscellaneous	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	Tribal concern
A Native American website has suggested that Mr. Servheen is integrally involved with a renowned trophy hunting organization.	Miscellaneous	The grizzly is the slowest reproducing mammal in North America. To our knowledge there is no population number that has ever been proclaimed "safe" by any reputable study. The businesses and residents in grizzly territory have learned to peacefully co-exist. Bear-on-human incidents are extremely rare within fifty miles of Yellowstone Park. There is simply no reason to delist other than cattle operations which have been leasing government land for cents on the fair market value dollar do not want to give up their "cushy deal". These are national lands. While we have many friends in Wyoming and Montana, there are times when local interests must yield to national interests. This is one of those times. The grizzlies should be allowed to "naturally expand." This especially includes expansion of their range into the Big Horn Mountains. I have elected to submit these comments anonymously. I am apprehensive about retaliation. A Native American website has suggested that Mr. Servheen is integrally involved with a renowned trophy hunting organization.	FWS-R6-ES-2016-0042-1432	

DO NOT DELIST Yellowstone Grizzlies ! It is a shameful fact that our country is nearly equally divided on all major issues including the de-listing of the endangered and protected iconic Yellowstone grizzly !We have spent 40 years and millions of dollars managing the grizzlies, let's do even more by now opening a wildlife corridor to at least Glacier National Park. This will allow for biological diversity in both bear populations.No informed, intelligent person or agency can honestly deny climate change. It is real, it is here now! Let's be patient and determine it's inevitable effect on our entire planet;flora and fauna.Allowing the states of Idaho, Montana and Wyoming to regulate grizzly bears through trophy hunts is the mosy unbelievable, ill conceived "solution" ever proposed! Idaho still allows bear baiting on spring bear hunts, when bears are coming out of their dens with their young cubs. We all have read about the mistakes hunters make currently killing grizzlies thinking they're black bears. The mother bears will instinctively keep their cubs back out of sight to investigate a food source, (bear bait usually rotten meat or sweets) a female grizzly killed and the cubs will perish. We've lost a breeding female and at least two cubs. A few of these scenarios in each state with no inter communication and the sustainable "safe" grizzly populations are decimated. Even though the states will say they will not allow baiting, what is to stop a grizzly from smelling the bait the same as a black bear. There is no way to prevent the grizzly from the baiting.Concerning livestock losses, there are many funds for reimbursement to ranchers. This is not valid. The tranches who are adjoining the national parks and are in the corridor zones, know this and should learn to live with the creatures of the parks. There are ways they can deter the predators.I could easily continue with more facts and common sense reasons for not Delisting Yellowstone Grizzlies.	Miscellaneous	DO NOT DELIST Yellowstone Grizzlies ! It is a shameful fact that our country is nearly equally divided on all major issues including the de-listing of the endangered and protected iconic Yellowstone grizzly ! We have spent 40 years and millions of dollars managing the grizzlies, let's do even more by now opening a wildlife corridor to at least Glacier National Park. This will allow for biological diversity in both bear populations. No informed, intelligent person or agency can honestly deny climate change. It is real, it is here now! Let's be patient and determine it's inevitable effect on our entire planet;flora and fauna. Allowing the states of Idaho, Montana and Wyoming to regulate grizzly bears through trophy hunts is the mosy unbelievable, ill conceived "solution" ever proposed! Idaho still allows bear baiting on spring bear hunts, when bears are coming out of their dens with their young cubs. We all have read about the mistakes hunters make currently killing grizzlies thinking they're black bears. The mother bears will instinctively keep their cubs back out of sight to investigate a food source, (bear bait usually rotten meat or sweets) a female grizzly killed and the cubs will perish. We've lost a breeding female and at least two cubs. A few of these scenarios in each state with no inter communication and the sustainable "safe" grizzly populations are decimated. Even though the states will say they will not allow baiting, what is to stop a grizzly from smelling the bait the same as a black bear. There is no way to prevent the grizzly from the baiting. Concerning livestock losses, there are many funds for reimbursement to ranchers. This is not valid. The tranches who are adjoining the national parks and are in the corridor zones, know this and should learn to live with the creatures of the parks. There are ways they can deter the predators. I could easily continue with more facts and common sense reasons for not Delisting Yellowstone Grizzlies.	FWS-R6-ES-2016-0042-1423	
These magnificent animals are a keystone species in Yellowstone Park, and represent the kind of wild beauty that is quickly disappearing from the earth. Millions of Americans treasure the experience of seeing these amazing animals in their natural world, and millions of visitors from countries around the world also value these animals.	Miscellaneous	I am opposed to the plan of Us Fish and Wildlife Service to delist Yellowstone bears from federal protection and further to allow trophy hunts on Yellowstone area grizzly bears. These magnificent animals are a keystone species in Yellowstone Park, and represent the kind of wild beauty that is quickly disappearing from the earth. Millions of Americans treasure the experience of seeing these amazing animals in their natural world, and millions of visitors from countries around the world also value these animals. Further, it makes no sense to delist Yellowstone grizzly bears under the Endangered Species Act inasmuch as wildlife biologists now recognize that biologically, grizzly populations have a very slow reproductive rate...statists show that fewer than 2,000 grizzlies exist in the continental states (down from 50,000 in the 19th century), also climate change, invasive species, and pesticide use make it harder for these animals to reproduce. It seems odd that the US Fish and Wildlife wants to reintroduce bears in the North Cascades of Washington State to ensure a genetically viable population, and at the same time, allow the remaining small population of grizzlies in Yellowstone Park to be hunted and killed by trophy hunters. This is not a logical decision. I urge the US Fish and Wildlife Service not to yield to pressure from special interest groups to desire to hunt, kill, and maim grizzly bears in Yellowstone Park for their own personal pleasure by issuing permits for trophy hunting. As you must be aware, the world was repulsed by the killing of the lion called Cecil in Africa last year. This incident created international negative response against trophy hunting and demonstrated that people who love wild populations of endangered animals will speak up and will not tolerate this kind of disrespect of endangered animals.	FWS-R6-ES-2016-0042-1467	
The bears have over reached the area intended and are diminishing the native population of elk and moose calves to a point that these herds are in grave danger now. Even though the environmental groups pushing for all of this protection don't seem to ever acknowledge this fact. Even the media does not report the severe impact bears and wolves have had on the populations of Moose and Elk. We live here and have to live with these bears which are fine as long as they are managed properly. It is a sad day when I am hunting elk to provide food for my family and I have to fear shooting a bear if I was under attack because it is a felony. It is a felony to protect myself from the direct threat of death by bear, you tell me whats wrong with that picture? The state of WYOMING is much more suited to managing the wildlife in our state than the Bureaucrats that do not live here and do not try to make a living here and raise a family here where we have to scrape a living out of not so much to work with. Lets get them de-listed so we can manage them properly. Tom Norwood, Arapahoe, Wyoming	Miscellaneous	The time has far past when this de-listing should have been in place. We are a responsible population of folks in the affected area. We rely on elk, deer, antelope and moose meat to feed our families every day of every year. The bears have over reached the area intended and are diminishing the native population of elk and moose calves to a point that these herds are in grave danger now. Even though the environmental groups pushing for all of this protection don't seem to ever acknowledge this fact. Even the media does not report the severe impact bears and wolves have had on the populations of Moose and Elk. We live here and have to live with these bears which are fine as long as they are managed properly. It is a sad day when I am hunting elk to provide food for my family and I have to fear shooting a bear if I was under attack because it is a felony. It is a felony to protect myself from the direct threat of death by bear, you tell me whats wrong with that picture? The state of WYOMING is much more suited to managing the wildlife in our state than the Bureaucrats that do not live here and do not try to make a living here and raise a family here where we have to scrape a living out of not so much to work with. Lets get them de-listed so we can manage them properly. Tom Norwood, Arapahoe, Wyoming	FWS-R6-ES-2016-0042-1504	
This apex predator plays a vital role. The reintroduction of the wolf in Yellowstone was a huge positive influence.	Miscellaneous	Do not delist the Grizzly bear for the following reasons. 1. FWS's mission is to protect wildlife, not delist. 2. The delisting will result in condemning the Grizzly to certain slaughter. 3. Climate change has decimated the pine nuts and wrecked havoc on the food sources despite what reports say. 4. Delisting is a death warrant for countless bears. 5. Obsolete methods of counting the bears are being used in jeopardy of good science. 6. This is a violation of ethics to destroy an iconic species that draws many dollars to the tri state area. Also, FWC has the obligation to protect, not sanction the killing of these magnificent creatures. They are a vital part of the West. 7. This apex predator plays a vital role. The reintroduction of the wolf in Yellowstone was a huge positive influence. 8. The 59 listed kills in 2015 is actually about half the actual kills. 9. Delisting will kill 200 bears out of the 700 in the first year. This is unacceptable and unsustainable. 10. FWC is losing credibility nationally for doing just this type of wildlife "management" which factors into "takes" that is only sugar coats the slaughter that results. 11. The ranching, hunting, grazing and other special interest groups are being overly patronized to via these unsound, lack of scientific decisions that destroy a species that many resources have gone into preserving & protecting. Do the right thing and don't even think about this ridiculous, tragic proposal that leave FWC with still another ill conceived decision that will forever taint your legacy. Thank you for the consideration. Show some vision and stand your ground.	FWS-R6-ES-2016-0042-1512	
These bears are icons of the American wilderness as well as a huge tourism draw to the region	Miscellaneous	I oppose the delisting of Greater Yellowstone Ecosystem grizzly bears. Their population is at risk as it isolated from other grizzly bear populations. There are no plans for connecting the two populations, which is key to long term survival of the species. Further, grizzly bears are one of the slowest reproducing mammals in North America. What would happen if a number of bears died due to unforeseen events in a single year? The population would be in jeopardy. Finally, state management of the bears is a risk in and of itself. We have seen what happened when these predator-unfriendly states "managed" the wolves. The populations were decimated. Wyoming's so much so that a federal judge had to re-list Wyoming wolves. There are no assurances that things would be any different with management of grizzlies. Indeed, the discussion between the states so far has indicated that they plan a trophy hunting season and that bears dispersing to connect with other populations would be among those first to be killed. As if that weren't enough, a majority of Americans oppose the delisting of Yellowstone area grizzly bears. These bears are icons of the American wilderness as well as a huge tourism draw to the region. They should be protected, not delisted.	FWS-R6-ES-2016-0042-1455	ecotourism

MOST AMERICANS OPPOSE DELISTING. Fifty-five percent of Americans are opposed to ending federal protections for the region's grizzly bears, and by a 3-to-1 margin people oppose grizzly hunting, a new poll conducted by Remington Research Group commissioned by the Humane Society of the United States and Wyoming Wildlife Advocates.	Miscellaneous	My position on the proposed rule concerning the Removal of Grizzly Bears from the Greater Yellowstone Ecosystem from the Endangered and Threatened Wildlife list is as follows: - The proposed rule does nothing to address the lack of an adequate grizzly gene pool in the Yellowstone area. The existing grizzly population is so small and lacks access to other populations north of this ecosystem. There currently are no plans between Montana, Idaho or Wyoming to provide the means for grizzlies to reach other bear populations which would give them the opportunity to improve the biological diversity. - DECLINING FOOD SOURCES: It has been documented by Wildlife Management teams that grizzlies main food sources have been wiped out due to climate change (whitebark pine), invasive species (cutthroat trout) and use of pesticides in/and near the Yellowstone Ecosystem (moths). While some waterways are being restocked with cutthroat trout, this is only a part of the necessary diet for grizzly bears. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. Montana, Wyoming and Idaho have shown themselves to be incredibly hostile toward predators. Bears trying to disperse have become victims of trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. Such is likely to be the norm after delisting. Any bear that has it's den outside the Grand Teton Park, Yellowstone Park, or on national forest lands, there is a good chance that these bears will be killed by hunters. This happened in November 2015 in Montana at the northern edge of the Yellowstone Ecosystem when a hunter, claiming self defense without proof of any aggression shown by the bear, shot and killed with one bullet, Grizzly #211, also known as Scarface, an aged grizzly (26 plus years) who happened to be in poor health. To add insult to the poaching of #211, the State of Montana withheld media release of this incident until after the comment period for the Delisting Grizzlies proposal was passed. This is exactly the kind of thing that removing Grizzlies from the Endangered List will become the norm for Montana, Wyoming and Idaho, under the guise of protecting the bears. The only protections these states want is to line their state coffers by the trophy hunters. - MOST AMERICANS OPPOSE DELISTING. Fifty-five percent of Americans are opposed to ending federal protections for the region's grizzly bears, and by a 3-to-1 margin people oppose grizzly hunting, a new poll conducted by Remington Research Group commissioned by the Humane Society of the United States and Wyoming Wildlife Advocates. - BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. As stated above, grizzlies are already being slaughtered by hunters. The claim of self-defense has yet to be verified, even after 5 months of investigation. If the Grizzly bear is delisted, further conflict with humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population.	FWS-R6-ES-2016-0042-1550	
Grizzly bears are large, long lived, and slow to reproduce are one of the most widely recognized of North America's charismatic mammals. People value grizzlies for cultural, aesthetic, ecological, and economic reasons.	Miscellaneous	Attachments Proposed Rule Comment	FWS-R6-ES-2016-0042-1585	
FWS claims that the agency looks forward to consulting with Native American tribes about the delisting. But fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting.	Miscellaneous	FWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. But no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claims that the shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foodstis not a threat to the grizzly's long term survival. But this is not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. But under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. FWS claims that the agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. But when David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS claims that Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. But this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS claims that the agency looks forward to hearing from the public about delisting. Yet a recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. FWS claims that the agency looks forward to consulting with Native American tribes about the delisting. But fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala	FWS-R6-ES-2016-0042-1611	
their isolation in Yellowstone deprives them of fresh genetic input, which leads to weakness and compromised health of future generations. Instead of removing these grizzlies from the Federal List of Endangered and Threatened Wildlife, there should be an all-out effort to permanently open up safe corridors so they can travel out of the park from Yellowstone through to central Idaho and on up to the Yukon, and back. Every effort should be made to establish this. I	Miscellaneous	To FWS - regarding proposed rule to remove Yellowstone's grizzly bears from the Federal List of Endangered and Threatened Wildlife: Grizzlies are top predators, and are absolutely essential for keeping the Yellowstone ecological system intact. Scientists know that grizzlies are an "indicator species", and that their health and viability are crucial for a thriving ecosystem in Yellowstone. Grizzlies are already losing a major part of their food supply, the Whitebark pine nut, which puts them at serious risk for malnutrition and disease. Also, much of their feeding sources are in wide open areas, and delisting them will only serve to make them easy targets for game hunters and trophy shooters, putting them at serious risk for ultimate demise. In addition, their isolation in Yellowstone deprives them of fresh genetic input, which leads to weakness and compromised health of future generations. Instead of removing these grizzlies from the Federal List of Endangered and Threatened Wildlife, there should be an all-out effort to permanently open up safe corridors so they can travel out of the park from Yellowstone through to central Idaho and on up to the Yukon, and back. Every effort should be made to establish this. It is imperative that you DO NOT delist these bears.	FWS-R6-ES-2016-0042-1652	

Read the Public Trust Doctrine sometime...its only been in the constitution for over 200 years! Bears, wolves, cougars, and other predators are essential to our very lives in numerous ways. Just for example, of the 5 major lethal diseases devastating 30% of the cervid herds in North America today, 4 of them are transmittable to humans and are just as lethal to humans as they are to cervids. Delisting bears or any other predator is a direct threat to the safety and lives of humans. Delisting means you support the spread of rabies, Hanta Virus, Rocky Mountain Spotted Fever, Chronic Wasting Disease, Epizootic Hemorrhaging Disease, Blue tongue Virus, Bubonic Plague (500 cases every year reported in Co and NM) Lymes Disease, Dry Rot Hoof Disease, and a host of other diseases to reign amok in human populations. Medical costs cost everyone, so you are also promoting economical terrorism.	Miscellaneous	Please, do not delist Grizzly Bears. They have taken 40 years to increase their number by 600, or a mere 15 bears a year. The problems lies w/ in man's mismanagement of their food sources, White Bark Pine from climate change, the moronic illegal stocking of lake trout which feed on the brook trout which are a source of food for bears as they are shallow water fish compared to the deep water fish Lake trout are, and the use of pesticides which decimate the moth larva. In addition to this, mismanagement has relegated areas of habitat to remote islands making genetic diversity a problem. This is intentional as you advocate for more space for cattle knowing they cant stay in one locale year around...obviously, neither can wildlife. Your job description clearly states you are responsible for the welfare of the land, air, water, plant life including trees, and all animals that inhabit said land. It also states lethal use is the very last option. Because of your failure to manage in a sensible fashion, you wish to dispose of a species to cover up your error and your need for greed. Caving in to the political and special interest groups whims is further proof you are not managing wildlife in the interests of animal's welfare. I propose opening up corridors and buffer zones for all wildlife and delisting possible development areas for humans. There are some things money cant buy and our future generations have to have their safety of being able to sustain life insured. Read the Public Trust Doctrine sometime...its only been in the constitution for over 200 years! Bears, wolves, cougars, and other predators are essential to our very lives in numerous ways. Just for example, of the 5 major lethal diseases devastating 30% of the cervid herds in North America today, 4 of them are transmittable to humans and are just as lethal to humans as they are to cervids. Delisting bears or any other predator is a direct threat to the safety and lives of humans. Delisting means you support the spread of rabies, Hanta Virus, Rocky Mountain Spotted Fever, Chronic Wasting Disease, Epizootic Hemorrhaging Disease, Blue tongue Virus, Bubonic Plague (500 cases every year reported in Co and NM) Lymes Disease, Dry Rot Hoof Disease, and a host of other diseases to reign amok in human populations. Medical costs cost everyone, so you are also promoting economical terrorism. Regardless what you personally believe, something bigger than us put this whole design together. The complexity of it is fascinating and overwhelming how all living thing interact together in a connective fashion is something man cannot duplicate in his wildest imagination. Because you dont understand something is not a reason to hate it or want to kill it. Nature has an excellent record of managing itself. Our record sucks! Wy, Id, and Mt have 325K square miles of area and you call 5,000 square miles of habitat (62.5 of 1%) a successful recovery management? Let me clean out your bank account and give you 63 cents back and call that humane justice! Be real men...stand up and keep Bears and other predators listed and protected. Keep this planet alive and our future generations as well. Thank you for your time.	FWS-R6-ES-2016-0042-1602	
From my understanding there are only about 700-800 grizzlies in the lower 48 states, that is nothing! And you want to kill more? WHY? to sell tags?? What about the people who spend thousands of dollars just to view one, not shoot one? 400 million people visited Yellowstone this year and most of them to see the wildlife! They spend tons and tons of money in the Wyoming state as well as Montana and surrounding states. Does it really make sense to sell a few tags to satisfy the 400 hundred trophy hunters you get or to continue to let the bears LIVE and have 400 million people paying and spending money in their states?	Miscellaneous	I am writing this in hopes that you will take my statements to heart. I am against delisting the grizzly bear in the greater Yellowstone ecosystem for many reasons. One of which is I traveled to Yellowstone this past August just to see grizzly bears and wolves. My friend and I spent thousands of dollars on this trip. Something I have saved a lifetime for and could finally do it. I am 54 years old and to see a grizzly in the wild as well as a wolf was a life long dream, and I saw both on my trip. I would spend it again, and I will as it changed my life. Delisting the bears will only do more harm and put them at so much risk, they need a buffer zone!!! Grizzlies are very slow in reproducing their young. IN fact I believe one of the longest for a mammal in the US. It takes a long time to rebound a sustainable population when it takes so long for them to rear their young and produce. FI many females are shot and killed by the trophy hunters we loose the main source of this breeding. It could devastate the population! Grizzlies as well as other animals in and around the park are loosing their habitat drastically. They have no choice but to leave the park to find food. And yes, this does cause conflict with ranchers. But you shoot those bears anyways, even under the protection of the ESA. Do we really need to kill more? From my understanding there are only about 700-800 grizzlies in the lower 48 states, that is nothing! And you want to kill more? WHY? to sell tags?? What about the people who spend thousands of dollars just to view one, not shoot one? 400 million people visited Yellowstone this year and most of them to see the wildlife! They spend tons and tons of money in the Wyoming state as well as Montana and surrounding states. Does it really make sense to sell a few tags to satisfy the 400 hundred trophy hunters you get or to continue to let the bears LIVE and have 400 million people paying and spending money in their states? Personally I am sick to death of this country catering to those who would rather trophy hunt an animal for no good reason but to satisfy as sadistic dream. These bears are part of your ecosystems, they are needed, they have a purpose, they matter!!! If you want to crunch numbers I am sure you will find that more people enjoy having the bears on our planet than Don't! the only reason a hunter wants them is to shoot them, to kill them to break up their family to have a RUG! Learning to co-exist with them may be a little harder and take a bit more energy that a quick gun shot would, but at least they get to live and be wild and free. It is time our government looked at the people who want the bears to be here! We should have a say in this matter too, and sometimes that is not the case, most times that is not the case. We cater to those who only know how to use a gun for their thrills. I however would rather shoot them with a camera for a lifetime memory and pay whatever it takes to be able to do so. Please, I beg you to keep these bears protected. There already are many poached, taken out by our own agencies because of depredation, and other non natural causes.....please stand up and fight for those of us who want to save the bears, it is time to do what is right by our wildlife and do what we have to do to ensure a future for these bears. Do not let it go to the states to manage as it is pretty clear how that will go. Most of these states are very hostile towards predators and do not take in the fact that it is all based on hate and not science. I want my grandchildren to see a majestic grizzly before the hunters shoot them all, before the states eradicate them from the planet to save the precious COWS. When does it stop? When does it end? It has to start here and not delist these bears. It is time now to take a stand against all the killing of all this wildlife, find ways to co-exist better with them in our lives. I am not against hunting, I own a hunting camp in Michigan. But what we shoot, we put on our table. We do not display it on our wall or floor. Trophy killing is horrible and senseless. That is all this delisting will be about...trophy killing. And while your at it, maybe think about banning trapping as that is pretty much about the most sickening form of hunting ever, that went out in the 1800's. Only those sadistic enough to watch an animal suffer do this kind of thing. Not a person I want living in my neighborhood, I can tell you that! It is time to end all this madness and really look at the big picture. our ecosystems are at risk. Our wildlife has been at great risk for too long now and it is time now to make it	FWS-R6-ES-2016-0042-1637	
Americans, and international tourists, spend a lot of money, to travel to Yellowstone and Grand Teton National Parks, for the chance to view wildlife, and it's fiscally irresponsible and abhorrent to even propose hunting these magnificent and conservation-sensitive animals.	Miscellaneous	As an American taxpayer gravely concerned with thriving biodiversity, I oppose delisting and trophy hunting as a management plan. Grizzly bear habitat protections and demographic standards are too limited in geographic scope, and after more than 40 long years for the species to recover, the last thing we should do is delist them from federal protections and hand them over to the states. The draft delisting rule and conservation strategy does not fulfill adequate protections once grizzlies are removed from federal protections. Just as disturbing, in the 21st century with our vast knowledge and technology; our ability to resolve bear-human conflicts with viable non-lethal alternatives available, trophy hunting is unjustifiable and ethically repugnant. Millions of Americans, and international tourists, spend a lot of money, to travel to Yellowstone and Grand Teton National Parks, for the chance to view wildlife, and it's fiscally irresponsible and abhorrent to even propose hunting these magnificent and conservation-sensitive animals.	FWS-R6-ES-2016-0042-1656	

Aldo Leopold in his book, <i>A Sand County Almanac</i> suggested that we should appreciate and protect wildlife because of its intrinsic value. That we should think of how great nature is because its nature. Also, we should think of the cultural diversity of the natural systems aside from what resources nature has to offer for people. He says that instead of trying to be the owners of nature we should be the stewards of nature. We should enjoy being part of nature, the home to all living organisms including humans. If we look at it this way, we should try to protect the grizzly bears because of their importance to the ecosystem.	Miscellaneous	My name is Guadalupe Cordoba. I am currently a senior at St. Mary's University. I write this letter in concern to the revision of 50 CFR 17.11 which would remove the Greater Yellowstone Ecosystem (GYE) grizzly bear to a distant population segment (DPS) from the Federal List of Endangered and Threatened Wildlife. I think this is a great mistake. For example, it has been proven that grizzly bears are an umbrella species, meaning that because they require a large habitat, this protects other organisms living in the same habitat as the grizzly bears. I understand that long-term conservation monitoring will be taken place, however, this would only monitor the grizzly bear population and not the different organisms that live in the habitat of the grizzly bears. According to this proposal, the Interagency Grizzly Bear study Team (IGBST) will continue to monitor habitat standards and adherence to the 1998 baseline. Although, a continuation to monitor the abundance, and distribution of grizzly bear foods will still just focus on one species. Like I mention earlier, the grizzly bear being on the list of endangered species has allowed many organisms to continue to stay in their habitat. In the book <i>Spine of the Continent: The Race to Save America's Last, Best Wilderness</i> by Mary Ellen Hannibal emphasize the importance of having connectivity. Animals need corridors to do their natural migrations and potential connect different populations of grizzly bears. Grizzly Bears need a large habitat to gather food, sleep, and mate. If grizzly bears are limited their habitat, we might see habitat destruction because the connectivity of grizzly bears to their natural habitat could have a major effect on other organisms. For example, when grizzly bears dig for food they aerate the soil, and while eating salmon they make food available for scavengers and transfer rich nutrients from the river to forest. I think this proposal does not take into account the full connections that the grizzly bears have with other species and the ecosystem. When a land is divided into different small patches of land, fragmented, large animals like the grizzly bears would not be able to survive. In a study by William Newmark in 1987 he said that even though a species is protected, it will not survive if they are not able to move freely. Having boundaries just limits the connectivity of the animals and affects their population and others species who depend on the habitat of the larger species like the grizzly bears. The grizzly bears being part of the Endangered and Threatened list allows the grizzly bear to have the large habitat they need. Also, as humans, we need to think about the ethics regarding the ability we have to control and alter the habitat of so many species. Aldo Leopold in his book, <i>A Sand County Almanac</i> suggested that we should appreciate and protect wildlife because of its intrinsic value. That we should think of how great nature is because its nature. Also, we should think of the cultural diversity of the natural systems aside from what resources nature has to offer for people. He says that instead of trying to be the owners of nature we should be the stewards of nature. We should enjoy being part of nature, the home to all living organisms including humans. If we look at it this way, we should try to protect the grizzly bears because of their importance to the ecosystem.	FWS-R6-ES-2016-0042-1667	
Bears are not just important unto themselves, a for people or cultural groups, but for these habitats. Please do not delist Grizzlies. To do so is to doom them and to cause harm to the ecosystems they are a part of.	Miscellaneous	See Attached Attachments Trygstad Ellen	FWS-R6-ES-2016-0042-1607	
Grizzly bears provided a huge benefit to not only their environment but to other species as well, which makes them an umbrella species. Grizzlies are considered to be an umbrella species because by protecting the bears and their habitats, we are also protecting the various species that live within a bear's habitat. Many scientists believe that grizzly bears are an essential part of healthy, fully functional ecosystems all across western North America. Grizzlies are known as a keystone species, meaning that Grizzlies play a large role in maintaining an ecosystem. Grizzlies are ecosystem engineers that help regulate prey species by playing its natural role as a large predator, and help disperse the seeds of many plant species, such as a variety of barriers (like blueberries). They also help maintain plant and forest health, by aerating the soil, allowing air and water to penetrate build-up grass, when they dig for roots or nuts.	Miscellaneous	See attached file(s) Attachments grizzly bears	FWS-R6-ES-2016-0042-1668	
At the very least, I would hope that the federal government would follow the lead of Governor Bullock who has stated that the bears of yellowstone are recognizable and loved by millions and set a buffer around the park to exclude hunting.	Miscellaneous	Thank you for the opportunity to comment on this vital issue. My wife and I are annual visitors to the Yellowstone ecosystem and revel in the opportunity to reconnect with the Wild America that is our heritage. The wild grizzly bear is our iconic image, wild, free and powerful, and the limited sightings we have are some of our most cherished. We understand that as recovery continues, there may be a need to limit their numbers as they near the limits of their acceptable boundaries. By no means do we believe the grizzly population has reached a full recovery or capacity for this ecosystem. The population is fragile, poaching and necessary kills have reached unheard of levels, and the real impact of climate change is yet to be discovered. Take time and make an informed, scientifically sound decision before delisting the bears. At the very least, I would hope that the federal government would follow the lead of Governor Bullock who has stated that the bears of yellowstone are recognizable and loved by millions and set a buffer around the park to exclude hunting. Thank you for this opportunity.	FWS-R6-ES-2016-0042-1701	
My tax dollars better not be going to support those that destroy nature	Miscellaneous	Since when did Yellowstone turn into private for-profit hunting grounds or killing fields? I thought Yellowstone was a National Park? Isn't the goal of our national parks to protect nature? My tax dollars better not be going to support those that destroy nature. The Greater Yellowstone Area is not great if this bill passes & will be taken off of my family vacation destination list if this bill passes.	FWS-R6-ES-2016-0042-1709	

It is important to understand that grizzly bears are an important umbrella species. By removing protection from the bears, you would be removing protection from their entire ecosystem. Because bears are predators, they help to manage the population sizes of many of the herbivores in the area. If the grizzly bear population significantly decreased, the herbivore populations would be allowed to increase. This could cause some overgrazing problems in the ecosystem, which would mean less food for all other species in the GYE, which would mean a decrease in multiple populations and communities, which would mean a decrease in overall biodiversity. This scenario may be a bit exaggerated, but it at least shows the important role the bears play in their ecosystem. In addition, bears, like humans, are omnivores, meaning they can eat almost anything. Berries and other plants make up a good portion of their diet, so every time they forage for food, they can pick up pollen on their fur and can carry countless seeds in their bellies. Because bears travel large distances, the undigested seeds in their droppings will have a whole new location to sprout and grow, away from their parent plants. This in turn, contributes to the overall health and genetic diversity of the vegetation. If the bears are no longer protected, then the vegetation will suffer as well.	Miscellaneous	I oppose removing the GYE grizzly bear population from the List of Endangered and Threatened Wildlife. While the population has made a significant recovery since 1975 (from about 136 to about 700 today according to the National Park Service website), delisting the species now will only cause more harm than good. Removing protection from the bears will not only harm their own population, but may harm the entire ecosystem as well. It has been shown time and time again that most people are not comfortable with the idea of living next door to wild grizzly bears, or any predator for that matter. Without federal protection, management authority will be given to state and local governments who will almost certainly want to open hunting seasons on the bears. Such trophy hunting could significantly impact the genetic diversity of the population. This is because most hunters would target large, strong, healthy, and attractive bears, so they would be removing these favorable traits from the gene pool. Eventually, the population would grow weaker and would be more vulnerable to the effects of habitat loss, disease, climate change, etc. Aside from hunting, state governments would probably allow their residents more freedom to "remove" any bears that they feel would pose a threat to them. Of course, most people would unfortunately feel threatened by any bear within shooting distance. All these factors combined would certainly cause the GYE grizzly bear population to decline once again. It is important to understand that grizzly bears are an important umbrella species. By removing protection from the bears, you would be removing protection from their entire ecosystem. Because bears are predators, they help to manage the population sizes of many of the herbivores in the area. If the grizzly bear population significantly decreased, the herbivore populations would be allowed to increase. This could cause some overgrazing problems in the ecosystem, which would mean less food for all other species in the GYE, which would mean a decrease in multiple populations and communities, which would mean a decrease in overall biodiversity. This scenario may be a bit exaggerated, but it at least shows the important role the bears play in their ecosystem. In addition, bears, like humans, are omnivores, meaning they can eat almost anything. Berries and other plants make up a good portion of their diet, so every time they forage for food, they can pick up pollen on their fur and can carry countless seeds in their bellies. Because bears travel large distances, the undigested seeds in their droppings will have a whole new location to sprout and grow, away from their parent plants. This in turn, contributes to the overall health and genetic diversity of the vegetation. If the bears are no longer protected, then the vegetation will suffer as well. Thus, as previously stated, delisting the GYE grizzly bear population would only cause more harm than good. In fact, it is very hard to see or understand what good could come out of the situation at all. Many make the argument that they are proposing this new change, because the grizzly bear population has gotten too large to manage within the GYE boundaries. But perhaps the problem isn't the population size, but the boundaries themselves. Many people fail to understand or accept the fact that you can't contain nature. You just can't. Human made property boundaries mean absolutely nothing to wildlife. Energy, animals, nutrients, and resources are meant to flow throughout ecosystems and across landscapes, and will continue to (or at least attempt to) flow across our boundaries despite our best efforts to contain them. If connectivity is lost and ecosystems and habitats are cut off from one another, then these systems will slowly weaken and perish. So rather than delisting the grizzly bears, perhaps their protection should instead be extended. Why has that never been considered an option?	FWS-R6-ES-2016-0042-1664	
The amount of over 700 grizzly bears in the Greater Yellowstone Ecology system is probably way high. The 50 or so Native American tribes in the surrounding area do not want the grizzly bears delisted.	Miscellaneous	The amount of over 700 grizzly bears in the Greater Yellowstone Ecology system is probably way high. The 50 or so Native American tribes in the surrounding area do not want the grizzly bears delisted. I am concerned with what would happen to the grizzly bears out of the park and those in the park that may go outside the park. They all may be killed. I would like to see posted the plans that each state has regarding bears out side the park if they become delisted. These are just some of my many concerns. I don't want the bears to end up like the wolves and the coyotes..	FWS-R6-ES-2016-0042-1741	
Although many factors were taken into consideration in the proposal, two main aspects of conservation biology were forgotten: 1) the ecosystem is a synchronized whole; protecting bears would protect other species as well, especially because bears are an umbrella species to their habitats and 2) all conservation methods, though pragmatic, have no definite outcome.	Miscellaneous	Keep Grizzly Bears on the Endangered and Threatened Species List As well as the Grizzly Bear population has recuperated within the past few years, these numbers alone cannot guarantee aggregate protection of the species. Although many factors were taken into consideration in the proposal, two main aspects of conservation biology were forgotten: 1) the ecosystem is a synchronized whole; protecting bears would protect other species as well, especially because bears are an umbrella species to their habitats and 2) all conservation methods, though pragmatic, have no definite outcome. Grizzly Bear conservation has been dynamic and many goals were reached including raising population numbers. However, just because the population has reached a certain set number does not mean they lack vulnerabilities. One such vulnerability is climate change. The issue of climate change is addressed in the proposal with the conclusion of having little impact on the bears. Grizzly Bears used to range from Northern Canada to Northern Mexico, a vast expanse of land known to many as the â€œSpine of the Continent.â€œ However, Grizzly bears are also creatures of the cold and with the rise in global temperature, their comfortable habitat range will continually be expurgated Northward. Climate change has also decline snowfall in certain areas; snowfall is important to Grizzlies as they inhabit dens where snow is unlikely to melt in warmer temperatures. As noted in the proposal, many Grizzly Bear biologists within this region do not believe climate change will affect the species. Though resilient and hardy creatures, by taking them off the Endangered and Threatened Species list, we are asking them to adapt to climate change as a whole species. As noted before, Grizzly Bears are known as a keystone and umbrella species of their systematic habitats. (Berger et al 2001) Just like the Grey Wolves in Yellowstone, even their presence affects many more species including both animal and plant life forms. Using the wolves as an example in Yellowstone, when the wolves were eliminated the whole ecosystem seemed to be dying alongside. Without wolves to control the Elk populations, the Elk overpopulated and ate or trampled many plant species. Without plant species, all the other mini-ecosystems such as the riverbanks were affected negatively as well. Though bear numbers are stable at the moment, they are faced with habitual vulnerabilities such as fragmentation and poaching. As the country develops, more and more land is urbanized and deforestation is rampant. Since the founding of our country, 90% of virgin forest has been cleared away due to human activities. (UMich) More and more roadways are built to convenience the lives of humans at the cost of roaming species. Habitat fragmentation is a somber issue often overlooked; fragmentation often leads to reduction of species richness, inbreeding, and loss of sustainability of the habitat for the animal itself. (Fahrig 2003) The concept of limited poaching is introduced especially if for self defense. However, bears are not harmful creatures and many methods can be implemented to prevent these creatures from attacking the population or the properties. The Habitat Based Recovery Criteria listed within the recovery planning are not backed with much scientific evidence; instead the bears are described as â€œopportunistic creaturesâ€œ (USF&W) As well as the bears are doing, they are not at the same level as historic numbers. Though I understand the change within the country over time due to large scale development such as the building of more roads, it must be understood the bears have too many factors affecting their recovery and a simple population number cannot be enough to gauge their elasticity. Removing Grizzly Bears from the Endangered and Threatened Species list only creates more vulnerability to the species. Berger, J. Stacey, PB. Bellis, L. and Johnson, MP. (2001), A MAMMALIAN PREDATORâ€œPREY IMBALANCE: GRIZZLY BEAR AND WOLF EXTINCTION AFFECT AVIAN N EOTROPICAL MIGRANTS. Eco App (11): 947â€œ960. doi:10.1890/1051-0761(2001)011%5B0947:AMPPIG%5D2.0.CO;2 Available at: http://onlinelibrary.wiley.com/doi/10.1890/1051-0761(2001)011%5B0947:AMPPIG%5D2.0.CO;2/abstract Global Deforestation, Glob Change 10(1) Mich. [Internet] Available at: http://www.globalchange.umich.edu/globalchange2/courses/lectures/deforest/deforest.html	FWS-R6-ES-2016-0042-1670	

While the vast majority Americans, 90% by a national poll, support the Endangered Species act hunters have historically had the "ear" of state management and have been allowed to hunt species to near extinction, we must reverse this hostile management style in Yellowstone as many more people visiting this beautiful National Park want to see LIVE bears. Case in point bear 399 a female that thousands upon thousands of visitors from the US and around the world come back to see year after year with her cubs. The hunting clubs already have a target on her back and this does not bode well for Yellowstone tourism as well as the grizzly bear population as a whole. As well as wanting to perserve the endangered species act most Americans also oppose delisting the Yellowstone grizzlies. Only 26% of Americans actually want to delist the grizzly. The vast majority again want and expect the USFWS to do to their job and continue to protect the wildlife under their care.	Miscellaneous	As a tax payer I would like to make my concerns known about any management plan to delist the Yellowstone Grizzlies. I am opposed for the following key reasons. 1. I have not seen any climate change impact study completed showing the impact on the current grizzly population. It has taken over 40 years to rebuild the grizzly population and they could be greatly impacted by climate change and their ability to survive if changes continue to negatively impact their food source such as it has with the Whitebark Pine. 2. Other food souces are declining as well due to other environmental reasons such as the Cutthroat Trout being lost due to invasive species taking over and moths are increasingly unreliable due to man's use of pesticides. These three primary food sources for grizzlies in decline mean that the current grizzly population will already be under stress to continue to survive without hunters being allowed to kill them as well. 3. Grizzly bears are already facing these hardships and coupled with being one of the slowest reproducing mammals we have in the United States it is a certainty that the killing of females would decimate the population within a very short period of time. Grizzlies have already lost 99% of their range. Yellowstone is one of the last of their terriories in the continental united states and we must be cognizant of that fact if hunting is allowed and they cannot sustain reproduction. 4. While the vast majority Americans, 90% by a national poll, support the Endangered Species act hunters have historically had the "ear" of state management and have been allowed to hunt species to near extinction, we must reverse this hostile management style in Yellowstone as many more people visiting this beautiful National Park want to see LIVE bears. Case in point bear 399 a female that thousands upon thousands of visitors from the US and around the world come back to see year after year with her cubs. The hunting clubs already have a target on her back and this does not bode well for Yellowstone tourism as well as the grizzly bear population as a whole. As well as wanting to perserve the endangered species act most Americans also oppose delisting the Yellowstone grizzlies. Only 26% of Americans actually want to delist the grizzly. The vast majority again want and expect the USFWS to do to their job and continue to protect the wildlife under their care. 5. A record number of Yellowstone area grizzly bears were already killed in 2015 despite Endangered Species Act protections. The grizzly population is already being removed for increased conflicts with ranchers and illegal hunting as they roam further out to look for food sources to compensate for their primary food sources being affected by climate change and other environmental impacts. As a result of these increased numbers of grizzly bear killings it is far too early to delist them without further study and discussion of other management plans.	FWS-R6-ES-2016-0042-1750	
As noted before, Grizzly Bears are known as a keystone and umbrella species of their systematic habitats. (Berger et al 2001) Just like the Grey Wolves in Yellowstone, even their presence affects many more species including both animal and plant life forms. Using the wolves as an example in Yellowstone, when the wolves were eliminated the whole ecosystem seemed to be dying alongside. Without wolves to control the Elk populations, the Elk overpopulated and ate or trampled many plant species. Without plant species, all the other mini-ecosystems such as the riverbanks were affected negatively as well.	Miscellaneous	Keep Grizzly Bears on the Endangered and I threatened Species List As well as the Grizzly Bear population has recuperated within the past few years, these numbers alone cannot guarantee aggregate protection of the species. Although many factors were taken into consideration in the proposal, two main aspects of conservation biology were forgotten: 1) the ecosystem is a synchronized whole; protecting bears would protect other species as well, especially because bears are an umbrella species to their habitats and 2) all conservation methods, though pragmatic, have no definite outcome. Grizzly Bear conservation has been dynamic and many goals were reached including raising population numbers. However, just because the population has reached a certain set number does not mean they lack vulnerabilities. One such vulnerability is climate change. The issue of climate change is addressed in the proposal with the conclusion of having little impact on the bears. Grizzly Bears used to range from Northern Canada to Northern Mexico, a vast expanse of land known to many as the "Spine of the Continent." However, Grizzly bears are also creatures of the cold and with the rise in global temperature, their comfortable habitat range will continually be expurgated Northward. Climate change has also decline snowfall in certain areas; snowfall is important to Grizzlies as they inhabit dens where snow is unlikely to melt in warmer temperatures. As noted in the proposal, many Grizzly Bear biologists within this region do not believe climate change will affect the species. Though resilient and hardy creatures, by taking them off the Endangered and Threatened Species list, we are asking them to adapt to climate change as a whole species. As noted before, Grizzly Bears are known as a keystone and umbrella species of their systematic habitats. (Berger et al 2001) Just like the Grey Wolves in Yellowstone, even their presence affects many more species including both animal and plant life forms. Using the wolves as an example in Yellowstone, when the wolves were eliminated the whole ecosystem seemed to be dying alongside. Without wolves to control the Elk populations, the Elk overpopulated and ate or trampled many plant species. Without plant species, all the other mini-ecosystems such as the riverbanks were affected negatively as well. Though bear numbers are stable at the moment, they are faced with habitual vulnerabilities such as fragmentation and poaching. As the country develops, more and more land is urbanized and deforestation is rampant. Since the founding of our country, 90% of virgin forest has been cleared away due to human activities. (UMich) More and more roadways are built to convenience the lives of humans at the cost of roaming species. Habitat fragmentation is a somber issue often overlooked; fragmentation often leads to reduction of species richness, inbreeding, and loss of sustainability of the habitat for the animal itself. (Fahrig 2003) The concept of limited poaching is introduced especially if for self defense. However, bears are not harmful creatures and many methods can be implemented to prevent these creatures from attacking the population or the properties. The Habitat Based Recovery Criteria listed within the recovery planning are not backed with much scientific evidence; instead the bears are described as "opportunistic creatures"(USF&W) As well as the bears are doing, they are not at the same level as historic numbers. Though I understand the change within the country over time due to large scale development such as the building of more roads, it must be understood the bears have too many factors affecting their recovery and a simple population number cannot be enough to gauge their elasticity. Removing Grizzly Bears from the Endangered and Threatened Species list only creates more vulnerability to the species. Berger, J. Stacey, PB. Bellis, L. and Johnson, MP. (2001), A MAMMALIAN PREDATOR-PREY IMBALANCE: GRIZZLY BEAR AND WOLF EXTINCTION AFFECT AVIAN N EOTROPICAL MIGRANTS. Eco App (11): 947-960. doi:10.1890/1051-0761(2001)011%5B0947:AMPPIG%5D2.0.CO;2/abstract Global Deforestation. Glob Change Uoi Mich. [internet] Available at: http://www.global-change.umich.edu/globalchange7/current/lectures/deforest/deforest.html	FWS-R6-ES-2016-0042-1670	
the move is opposed by local Indian tribes 'GOAL Tribal, an association of Native American tribes and groups'	Miscellaneous	I strongly OPPOSE the proposed removal of Grizzly bears from the Endangered list. --recent reports of the killing of Scarface (tagged as Bear 211) tells us about the future that faces Grizzlies once they are delisted. Even while supposedly protected under the ESA, Scarface and the other 61 grizzlies in 2015 were killed. Delisting them would cause a bloodbath. --Why did it take 6 months to report Scarface's murder? It seems like it was done to fit the needs of the Feds' and states' delisting and trophy hunting narrative. -- the proposal is not based on the best available science. It is premature to change the bears' protected status -- delisting Grizzlies will immediately open them to Trophy Hunting. This move is nothing but a giveaway to rich, white hunters. -- the move is opposed by local Indian tribes 'GOAL Tribal, an association of Native American tribes and groups' -- the FWS claim that 'grizzlies have reached their "carrying capacity" in Yellowstone and the ecosystem will not support any additional bears' is extremely dubious. The bears' dispersal and increasing territory are likely because they are seeking additional food such as ungulates, something that puts them in direct conflict with local hunters and ranchers. This is due to the decline in the grizzlies' main food sources (such as whitebark pine nuts, which is under threat from invasive mountain pine beetles) --how will the bears' food will fare in the future -- how do we know that their population growth has truly stabilized. both avoid points indicate that proposal is extremely premature	FWS-R6-ES-2016-0042-1759	

It's important to keep in mind the surrounding ecology that would be affected by the capped capacity to the bear population. As many other commenters continually emphasize the value of the bear population, they do not take into account the complexity of wildlife habitats. Other wildlife populations will be affected by more bears. More bison, elk and moose have become part of their diet. Does this mean that the conservationist commenters value the life of a bear more than the life of other animals that could be opportunistically eaten by the bears given the chance?	Miscellaneous	The Greater Yellowstone area should remove the grizzly bear from the federal endangered species list. According to the data shown in graphs below it is perfectly reasonable for this species to no longer require federal attention and relinquish their management to the respective states. I believe we should use proper justification of data shown in this proposed rule to influence federal and state decisions, and not let the morals of hunting that many self-described conservationists influence decisions. The grizzly bears population has hit the species carrying capacity for that area according to figure 1. As hard as many find it to allow hunting of an animal, it is wise to allow the regulated ability for locals and visitors to minimally hunt this animal increasing the maximum benefits to costs for this resource. If the bear is not allowed to be hunted there is room for future increased danger from the predator since there could be more potentially harmful human encounters since the bears will venture further off national park grounds. Reducing the numbers of bears that leave the national park ground could keep unsafe encounters to a minimum. It's important to keep in mind the surrounding ecology that would be affected by the capped capacity to the bear population. As many other commenters continually emphasize the value of the bear population, they do not take into account the complexity of wildlife habitats. Other wildlife populations will be affected by more bears. More bison, elk and moose have become part of their diet. Does this mean that the conservationist commenters value the life of a bear more than the life of other animals that could be opportunistically eaten by the bears given the chance? The reduction of whitebark pine seeds could be problematic as well. Post hibernation, bears require all the nutrition possible to gain their fat reserves back. As documented these whitebark pine seeds be over consumed by the bear population. Adverse effects could be an increase in death for other wild animals or possible human deaths. There are thousands of visitors to Yellowstone every day, and there may be more human-bear interactions. As someone who values natural habitats and enjoys visiting our nation's largest national park it is our duty to now relinquish the responsibilities to manage these valued animals to their respective states. Let the coordination between fish and wildlife divisions keep the bear at a healthy population to continue to prosper, but not at such a high population that they can do other unnecessary harm to other parts of the forests ecology.	FWS-R6-ES-2016-0042-1740	
Recent studies have shown that GYE Grizzly Bears are a currently important, and significantly rising economic resource to GYE communities. Yellowstone National Park visitors have listed grizzlies and wolves as the two most important species they want to be able to observe due to their scarcity. Many national park visitors come specifically to see these apex predators. Live bears are much more valuable to the GYE economy than dead bears. Live grizzlies are likely the most economically valuable animal in the GYE.	Miscellaneous	I am apposed to delisting grizzly bears in the Greater Yellowstone Ecosystem (GYE) for the following reasons: 1. The fact is that one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services numbers. But what we do know is that at least 60 grizzlies died last year, mostly at the hand of man, and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest, if not the lowest reproductive rate of any mammal in the GYE. The continuation of such mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work needs to be done in the GYE to prevent many of these grizzly deaths before this population can be safely delisted. Such actions as mandating that ranchers remove their garbage and carcass dumps to county facilities, the use of bear-proof garbage cans in communities, camping areas, etc. within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for hunters and other public land users in grizzly habitat need to be implemented within the GYE before grizzlies are delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations, endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate bears from other populations into the GYE to improve genetic diversity but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat in the GYE and prevent them from colonizing other lands in which they were originally found. This will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of this land is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead should be "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout and possibly even army cutworm moths populations have recently been significantly reduced due to a variety of human caused issues. More research is needed to determine how the loss of these food sources will impact the future grizzly population in the GYE. 4. GYE Grizzlies should be managed as an ecosystem population rather than separately by three different states, all of which have stated their desire to significantly reduce the population and limit their occupied habitat. 5. Recent studies have shown that GYE Grizzly Bears are a currently important, and significantly rising economic resource to GYE communities. Yellowstone National Park visitors have listed grizzlies and wolves as the two most important species they want to be able to observe due to their scarcity. Many national park visitors come specifically to see these apex predators. Live bears are much more valuable to the GYE economy than dead bears. Live grizzlies are likely the most economically valuable animal in the GYE. 6. Hunting organizations and state wildlife management agencies have advanced the myth that grizzlies need to be hunted for them to fear man and that hunting will therefore reduce conflicts and increase the safety of people. Recent studies by respected grizzly researcher David Mattson and others have debunked this myth showing the exact opposite to be true. Bears used to being around people who exhibit them no harm show an overall decreased aggressive response to humans. A dead bear obviously cannot learn anything. Thank you for this opportunity to express my views on this important issue. My hope is that the U.S. Fish & Wildlife Service will not cave into the political pressure being exhibited by a few powerful groups that want to eliminate or greatly reduce the GYE grizzly.	FWS-R6-ES-2016-0042-1765	
Take into consideration all the businesses that rely on this tourism - the camping and boating concessions, the hotel industry.	Miscellaneous	Caving in to the trophy hunters will likely result in fewer visits to our great national parks, as visitors who want to see the iconic grizzly bear might just as well go somewhere else if the grizzly population of wilderness areas in Western states is threatened. Take into consideration all the businesses that rely on this tourism - the camping and boating concessions, the hotel industry. In addition, these animals are still struggling to keep their population at healthy levels, and the recent changes in our climate cycles include such as the persistence of insects through the winter months that would have died off in the past and the migration into the area of invasive species. The food chain that sustains the grizzlies is being affected. Opening up a season on grizzly kills is not in the best interests of this nation.	FWS-R6-ES-2016-0042-1794	
The Fremont County (Idaho) Farm Bureau (FCFB) strongly supports Grizzly bear delisting under Docket No. FWS-RS-ES-2016-0042. The FCFB is one of 37 county Farm Bureaus comprising the Idaho Farm Bureau Federation, whose combined membership is over 73,400 member families throughout the state. Approximately 18 members live on the eastern edge of the Greater Yellowstone Ecosystem (GYE) and are directly impacted by Grizzly bears and the regulations surrounding them. I agree with the Federal Register announcement of March 11, 2016, Grizzly bears in the GYE have reached great enough population numbers to no longer meet the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). Per the announcement, occupied range has more than tripled in size. Local officials say the range is fully occupied and young or transient bears encounter difficulty in establishing their own home ranges. The states of Wyoming, Idaho and Montana requested delisting the GYE Grizzly bear population and are working on post-delisting management plans. FCFB supports these efforts as well as the delisting of the GYE Grizzly bear population. Thank you for the opportunity to express my support for Docket No. FWS-R6-ES-2016-0042.	Miscellaneous	See Attached Attachments Falzarano Catherine et al.	FWS-R6-ES-2016-0042-1792	

Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I urge you to postpone delisting the Yellowstone grizzly bear population. The current USFWS proposal to remove Yellowstone grizzly bears from the endangered species list fails to preserve the progress made toward bear recovery. Despite progress, their recovery is still uncertain. The USFWS proposal would permit states to exceed maximum bear deaths for several years before any review, with potentially irreversible damage, and would allow eradication of bears in some areas. We cannot let the grizzly bear population move back towards extinction by removing critical protections prematurely. Please keep Yellowstone grizzlies on the Federal List of Endangered and Threatened Wildlife until adequate plans are in place at the state level to ensure their true recovery. Thank you for your consideration and action to protect grizzly bears.	Miscellaneous	See Attached Attachments Falzarano Catherine et al.	FWS-R6-ES-2016-0042-1792	
Finally, if hunting is allowed, there must be no-hunt zones around the national parks and connecting Yellowstone and Grand Teton national parks. Hunting of roadside bears and popular park bears that wander out of the park endangers not only the bear population but the economy of the region.	Miscellaneous	Please keep Yellowstone ecosystem grizzly bears protected under the Endangered Species Act. If bears are delisted, hunting should not be allowed. A large majority of Americans (68%), including 50% of hunters, oppose sport hunting of grizzly bears. These animals are icons of the West and are revered as sacred beings by the native tribes, 50 of which oppose delisting. In addition, record number of grizzly bears were killed in 2015 - including the famous patriarch of Yellowstone, Scarface. Most of these killings were due to conflict with hunters or livestock operations. Once delisted, the states will be able to remove even more bears from the ecosystem due to human conflicts. We need to see what that looks like before grizzly hunting is permitted. Therefore, if bears are delisted, USFWS should institute a minimum five year moratorium on hunting to enable the surrounding states to prove effective management of grizzly bears. Finally, if hunting is allowed, there must be no-hunt zones around the national parks and connecting Yellowstone and Grand Teton national parks. Hunting of roadside bears and popular park bears that wander out of the park endangers not only the bear population but the economy of the region. Yellowstone's nature-based economy is worth one billion dollars a year. People who work at the park can tell you what visitors are coming to see. It is not the mud pots or Old Faithful that are the big draw. Tourists flock to Yellowstone and the Grand Tetons for the wildlife - with grizzly bears topping the list. For these reasons, I ask USFWS to withdraw its plan to delist grizzly bears in the Yellowstone ecosystem or, at a minimum, dramatically strengthen the plan to protect a population that took 40 years to grow.	FWS-R6-ES-2016-0042-1822	
Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting.	Miscellaneous	Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and fish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations." The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting.	FWS-R6-ES-2016-0042-1859	Tribal Concerns
"Problem" bears are still handled on a case by case basis and economically, their value as a draw to the National Parks (Yellowstone and Teton) where they reside is estimated to be greater than \$10,000,000 per year. Any income gained by delisting and issuing hunting permits would be short lived and modest to nonexistent in comparison. The argument that trophy hunting will be economically important to saving the grizzly is arcane and outdated.	Miscellaneous	I am writing today to express my concern over the proposed plan to delist the Grizzly Bear from the Endangered Species Act. Many have stated on social media and in articles concerning the subject that appealing to your office and the state governments of Idaho, Montana and Wyoming is a waste of time. As far as I am concerned, you are still part of the US Government and, as such, for the people. Therefore, I am confident that you will treat the concerns of all constituents with thoughtful consideration in this and all matters related to your work. Please vote to keep the Grizzly Bear under the protection of the Endangered Species Act. Yes, grizzly numbers in the Greater Yellowstone Ecosystem have grown from a low near 150 before listing, to over 700. Seven Hundred.....not a large number by any means. Couple that with the facts that they are very slow to reproduce, have at best a 50% chance of making it to breeding age and their primary food sources are being devastated by climate change make this rebound in numbers tenuous at best. At this time, there is no economic or safety value to delisting. "Problem" bears are still handled on a case by case basis and economically, their value as a draw to the National Parks (Yellowstone and Teton) where they reside is estimated to be greater than \$10,000,000 per year. Any income gained by delisting and issuing hunting permits would be short lived and modest to nonexistent in comparison. The argument that trophy hunting will be economically important to saving the grizzly is arcane and outdated. One should also factor in the sentiments not only of our nation, but that of people from around the globe, many whom travel to the US annually for the chance of glimpsing one of these iconic bears. How can we ask other nations to conserve and protect their wildlife when we stop protecting ours? And, yes, they are a keystone species. Their recovery, along with that of the two other major predators in Greater Yellowstone, the wolf and the mountain lion, have been shown to have improved the health of the entire ecosystem. I hope that you will consider this argument and that, in the final vote, our federal government will stand behind continuing to protect this iconic species.	FWS-R6-ES-2016-0042-1864	

And, yes, they are a keystone species. Their recovery, along with that of the two other major predators in Greater Yellowstone, the wolf and the mountain lion, have been shown to have improved the health of the entire ecosystem.	Miscellaneous	I am writing today to express my concern over the proposed plan to delist the Grizzly Bear from the Endangered Species Act. Many have stated on social media and in articles concerning the subject that appealing to your office and the state governments of Idaho, Montana and Wyoming is a waste of time. As far as I am concerned, you are still part of the US Government and, as such, for the people. Therefore, I am confident that you will treat the concerns of all constituents with thoughtful consideration in this and all matters related to your work. Please vote to keep the Grizzly Bear under the protection of the Endangered Species Act. Yes, grizzly numbers in the Greater Yellowstone Ecosystem have grown from a low near 150 before listing, to over 700. Seven Hundred.....not a large number by any means. Couple that with the facts that they are very slow to reproduce, have at best a 50% chance of making it to breeding age and their primary food sources are being devastated by climate change make this rebound in numbers tenuous at best. At this time, there is no economic or safety value to delisting. "Problem" bears are still handled on a case by case basis and economically, their value as a draw to the National Parks (Yellowstone and Teton) where they reside is estimated to be greater than \$10,000,000 per year. Any income gained by delisting and issuing hunting permits would be short lived and modest to nonexistent in comparison. The argument that trophy hunting will be economically important to saving the grizzly is arcane and outdated. One should also factor in the sentiments not only of our nation, but that of people from around the globe, many whom travel to the US annually for the chance of glimpsing one of these iconic bears. How can we ask other nations to conserve and protect their wildlife when we stop protecting ours? And, yes, they are a keystone species. Their recovery, along with that of the two other major predators in Greater Yellowstone, the wolf and the mountain lion, have been shown to have improved the health of the entire ecosystem. I hope that you will consider this argument and that, in the final vote, our federal government will stand behind continuing to protect this iconic species.	FWS-R6-ES-2016-0042-1864	
Dramatic declines in both the wolf and grizzly populations could have negative economic consequences for the greater Yellowstone economy. The most recent federal study of the Yellowstone economic impact estimated it to be \$543.7 million annually during 2014, a figure that certainly was higher last year as the number of visitors once again increased (a peer-reviewed visitor spending analysis was conducted by U.S. Geological Survey economists Catherine Cullinane Thomas and Christopher Huber and National Park Service economist Lynne Koontz).	Miscellaneous	See attached file(s) Attachments Angresano Grizzly Request	FWS-R6-ES-2016-0042-1840	
Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations."	Miscellaneous	Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online. Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and fish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations." The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting.	FWS-R6-ES-2016-0042-1859	Tribal Concerns
The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources.	Miscellaneous	The proposal to delist Yellowstone Grizzly Bears is irresponsible and will result in the decimation of our Country's iconic symbol of the West. For the following reasons below the proposal to delist must be abandoned: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. 2. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout. 3. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. The population will decline after delisting, and cannot be sustained without life-support measures. 4. The delisting plan fails to address issues associated with high, ongoing human caused grizzly bear mortality. Most of the grizzly bears that die in the Greater Yellowstone Ecosystem die of human causes, and most are avoidable. While Yellowstone Park and some communities outside the park have gone to enormous measures to remove grizzly bear attractants, others have not. The problem of mortality of food-habituated bears will only get worse after delisting, when allowable mortality levels are raised, and resources for conflict resolution are reduced. Because problem grizzly bears are a human safety problem, it only makes sense to resolve the ongoing sanitation issues in the ecosystem before delisting. 5. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public. 6. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources. Please keep the Yellowstone Grizzlies protected! Do not delist them!	FWS-R6-ES-2016-0042-1912	

There is another key reason that is being completely overlooked. None of your documents even acknowledge the spiritual importance to the Native American the significance of the Grizzly Bear to their culture. Doing so continues to keep Native Americans second class citizens in this country where all men are created equal	Miscellaneous	Delisting of the Greater Yellowstone Grizzly Bear is just a political ploy to appease the state governments of Wyoming, Montana, and the "Trophy Hunting" community. A live Grizzly Bear is worth far economically to these states and communities adjacent to Yellowstone Park than the revenue from a hunting license and a Grizzly Bear rug hanging on some hunters wall. There is absolutely no consensus on the size of the grizzly bear population in Yellowstone. There are some estimates, and all of those estimates are beset by bias of one sort or another. On the one hand you'll hear them claiming there's a thousand bears, based on use of one method. On the other hand they'll say there's 700 bears, based on the use of a different estimator altogether. The carrying capacity is not static, it's not a constant. It varies hugely, and I would argue that because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millennial drought which is promising more of the same to come, that we've seen a decline in carrying capacity. And so it's probably no surprise that the bear population is bumping its head up against carrying capacity. In fact, what we've had is a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods making them look outside of Yellowstone. The turning over of Grizzly Bear management to the states surrounding is a gross mistake. Look how they managed Grey Wolves it is nothing but an attack to eliminate them. I think it is important to keep them listed up until we have had a chance to reform state wildlife management, because state management is such a poor alternative. It's a really poor alternative at a time when the population is becoming increasingly vulnerable. I am would be willing to predict is that if you wait two years out into the future using the exact same methods you're using now, the population estimate will be down to 600, at which point, even by your reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using your methods. Under a scenario like that, with the drivers afoot leading to elevated grizzly bear mortality as-is, I don't think we can afford to have any increase in mortality for any reason at all. There is another key reason that is being completely overlooked. None of your documents even acknowledge the spiritual importance to the Native American the significance of the Grizzly Bear to their culture. Doing so continues to keep Native Americans second class citizens in this country where all men are created equal	FWS-R6-ES-2016-0042-2000	
When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Å Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. Å In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting: just like FWS is allowing to happen with wolves. The writing is on the wall. Å Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. This approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. The three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. Å Summary: The numbers of bears are not viable within GYE, GYE is an island for genetic diversity, the 3 states have horrible management of predators (has seen with wolves). I am AGAINST the delisting of the grizzly bear. Å	Miscellaneous	Thank you for allowing public comment on this Proposed Issue: The shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foodssis not a threat to the grizzly's long term survival. Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Plus, the GYE is an isolated "island" where species diversity is limited because corridor for new genetic are shut down because of human inter mention (i.e. road, ranches, etc) GYE region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. FWS will stay involved with protecting the grizzly population after delisting. In the form of a leaked memo, the 3 states said that they will open up trophy hunting seasons for the bears. I believe that opening such seasons is a prime motivation for the states in pushing for de-listing. If you look at what each state is doing to manage wolves, it is clear that they will only allow the minimum numbers of individuals to survive, nothing more. Relying on state agencies, that have shown a deep hatred towards any predator shall NOT be allowed or given a chance to manage a endangered species. FWS claim that they will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting: just like FWS is allowing to happen with wolves. The writing is on the wall. Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. This approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. The three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. Summary: The numbers of bears are not viable within GYE. GYE is an island for	FWS-R6-ES-2016-0042-1922	
Throughout life there are moments that create memories and start a fire in the thought process of just how great nature is and how it takes care of itself. Throughout the history of this country the American people have successfully balanced the their needs and the ecosystems needs. Clothing, medicine, food and material for various tools and utensils used in our lives have come from wild animals. The hunting, in these cases was for survival, it was necessary to live, today we have the luxury of having those same needs fulfilled through our world recognized commerce and economical machine. We have all the comforts without having to deplete our wild animals. The human population growth is exponentially high than the growth of our wild animal population. The grandeur of a young child seeing a Grizzly, Wolf or Mountain Lion for the first time is irreplaceable. I know I have those experiences which I will take to my grave as some of the grandest moments of my life. Our ecosystem needs these great creatures to maintain stability within their own demography. To allow the taking of Grizzly's or any other animal from our wild to put on a wall is criminal. Our native brothers know that this is not correct, it is against their own beliefs. Please, in you process of reviewing this for disposition do not allow the delisting of the Grizzly. My family and many other family's will be in your debt. Barry Judd and Family.	Miscellaneous	Throughout life there are moments that create memories and start a fire in the thought process of just how great nature is and how it takes care of itself. Throughout the history of this country the American people have successfully balanced the their needs and the ecosystems needs. Clothing, medicine, food and material for various tools and utensils used in our lives have come from wild animals. The hunting, in these cases was for survival, it was necessary to live, today we have the luxury of having those same needs fulfilled through our world recognized commerce and economical machine. We have all the comforts without having to deplete our wild animals. The human population growth is exponentially high than the growth of our wild animal population. The grandeur of a young child seeing a Grizzly, Wolf or Mountain Lion for the first time is irreplaceable. I know I have those experiences which I will take to my grave as some of the grandest moments of my life. Our ecosystem needs these great creatures to maintain stability within their own demography. To allow the taking of Grizzly's or any other animal from our wild to put on a wall is criminal. Our native brothers know that this is not correct, it is against their own beliefs. Please, in you process of reviewing this for disposition do not allow the delisting of the Grizzly. My family and many other family's will be in your debt. Barry Judd and Family.	FWS-R6-ES-2016-0042-2089	

Do not remove the grizzly bear from the list of endangered species. They are not only representative of this great land but they are an important part of the food chain and the ecosystem. People need to learn how to behave around these animals so we can all remain safe, including the animals.	Miscellaneous	As a resident of California, and someone who wishes she had seen a grizzly in the wild, here in California, I beg you to protect these beautiful animals. California has a grizzly on its flag because they once roamed this state, wild and free. They are now extinct in this state. They only live in a few places. Trophy hunting is appalling to me. It goes against everything I believe in. Wild animals deserve to be wild. To hunt an animal, simply for its hide or its head is beyond comprehension. Especially when there are so few left in the wild. If the numbers are lowered to the point where genetic diversity is compromised, then you will have issues with the animals' health. The wolves were hunted to extinction in Yellowstone and so many other animals began to overpopulate that the wolves were re-introduced. Now they are being hunted as well. If we do not look at the historical evidence, we are a doomed planet. The wild horses are being hunted to make room for cattle. The wolves are being hunted, to make room for cattle. The bison are killed because of the remote possibility they might make the cattle sick (not scientifically proven) but in reality, it's because they might eat grass the cattle would eat. As an American and an animal lover, I want my voice heard. Please take a look at the situation with an eye to the past. California has no more grizzlies. I had to go to Alaska to see one in the wild. It took my breath away. Such a magnificent animal. The bison in Yellowstone took my breath away when I saw them, as did the one lone wolf I saw. Do not remove the grizzly bear from the list of endangered species. They are not only representative of this great land but they are an important part of the food chain and the ecosystem. People need to learn how to behave around these animals so we can all remain safe, including the animals.	FWS-R6-ES-2016-0042-2239	
Based on the historical issues associated with the bear population - initial resistance to closing the dumps - and to assure a thoroughly objective and professional conduct of the analysis, we recommend the establishment of a professional "Peer Review Panel" to review the research design, criteria to be employed and the weight placed on that criteria for the conduct of the analysis. And, before the circulation of the findings of the analysis, it is recommended that the "Peer Review Panel" of nationally recognized professionals - appointed from a broad base of professionals and CITIZENS, review and comment upon the proposed conclusions of the analysis and those comments and the draft analysis be published for 120 days prior to adoption of the analysis. An effort of this national importance should not be conducted in an insular environment that all too often concludes "what we knew in the first place" or worse, what we wanted the analysis to conclude! Given the commitment of the Park Service to the "natural processes" in YNP, it is recommended that those processes, alone, should determine the future of the Grizzly Bear in Yellowstone National Park.	Miscellaneous	We have followed, and have been occasionally involved with "The Grizzly Bear in Yellowstone" since the research efforts of the Craighead brothers. Involved with the efforts of the "Great Bear Foundation" we are thoroughly aware of the issues associated with this analysis at this time. However, given the population of the bear and the limited "carrying capacity" of the YNP and the greater Yellowstone area, we see no valid reason for the removal of the Grizzly Bear from the list of Endangered species. Based on the historical issues associated with the bear population - initial resistance to closing the dumps - and to assure a thoroughly objective and professional conduct of the analysis, we recommend the establishment of a professional "Peer Review Panel" to review the research design, criteria to be employed and the weight placed on that criteria for the conduct of the analysis. And, before the circulation of the findings of the analysis, it is recommended that the "Peer Review Panel" of nationally recognized professionals - appointed from a broad base of professionals and CITIZENS, review and comment upon the proposed conclusions of the analysis and those comments and the draft analysis be published for 120 days prior to adoption of the analysis. An effort of this national importance should not be conducted in an insular environment that all too often concludes "what we knew in the first place" or worse, what we wanted the analysis to conclude! Given the commitment of the Park Service to the "natural processes" in YNP, it is recommended that those processes, alone, should determine the future of the Grizzly Bear in Yellowstone National Park. This is a critically important issue and the Grizzly Bear, in our judgment, should remain on the Endangered list of Threatened Species for the foreseeable future.	FWS-R6-ES-2016-0042-2407	
If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecosystem. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back.	Miscellaneous	De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, seasonable resilience, and availability throughout the habitat. The Greater Yellowstone Ecosystem (GYE) population is much smaller than the Northern Range bears, but the Northern population is not being considered for de-listing. The GYE population is being threatened because industrial, energy, and development companies have been applying tremendous political pressure through lobbying and heavy-handed public relations campaigns (promising jobs, dismissing science; the usual stuff). The GYE grizzlies are an "island population". This means that they are adapted to live and thrive within a specific geographic range. Substantial threats or changes to that habitat would likely pressure the bears to try and relocate, but they cannot successfully do so. The Greater Yellowstone Ecosystem is the environment to which they have adapted over eons. There is not another environment to which they could relocate and remain a viable species. Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability. US Fish and Wildlife data regarding the GYE grizzly population is suspect at best. For years, most counts of the population were in the 200 to 400 range. When de-listing was first proposed in 2007, the number suddenly shot up to 700. The methods used to arrive at that number involve a great deal of extrapolation from an extremely small sample of verified sightings. Rather than relying on US FWS data (pressured by lobbyists and hostile legislators), the public should demand research by independent organizations like The Ecological Society of America or the National Research Council. Current population estimates are untrustworthy, and the field needs good peer-reviewed analysis by objective scientists. If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecosystem. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it.	FWS-R6-ES-2016-0042-2542	
As a hunter and wildlife photographer, retired conservation officer, and regional habitat manager for the South Dakota Department of Game Fish and Parks, I feel that available scientific data indicates that the Greater Yellowstone Ecosystem (GYE) population of grizzly bears (<i>Ursus arctos horribilis</i>) has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). The United States Fish and Wildlife Service (Service) has also proposed to identify the GYE grizzly bear population as a distinct population segment (DPS). Therefore, the Service proposes to revise the List of Endangered and Threatened Wildlife, under the authority of the Act, by removing the GYE population. The Service has determined that the GYE grizzly bear population has increased in size and more than tripled its occupied range since being listed as threatened under the Act in 1975 and that threats to the population are sufficiently minimized. Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000 - also likely to be proposed for delisting), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. Existing state management plans will protect Yellowstone grizzly bears and will allow them to connect to other grizzly populations if they are delisted now. Wyoming, Montana, and Idaho, the three states where Yellowstone grizzly bears live, plan to jointly manage Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600. NGO's should be celebrating the delisting and not challenging because of the support from hunters, state and federal wildlife agencies for the work that they have done to restore this population. I fully support delisting this GYE population of grizzly bears. Great job USFWS!	Miscellaneous	As a hunter and wildlife photographer, retired conservation officer, and regional habitat manager for the South Dakota Department of Game Fish and Parks, I feel that available scientific data indicates that the Greater Yellowstone Ecosystem (GYE) population of grizzly bears (<i>Ursus arctos horribilis</i>) has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). The United States Fish and Wildlife Service (Service) has also proposed to identify the GYE grizzly bear population as a distinct population segment (DPS). Therefore, the Service proposes to revise the List of Endangered and Threatened Wildlife, under the authority of the Act, by removing the GYE population. The Service has determined that the GYE grizzly bear population has increased in size and more than tripled its occupied range since being listed as threatened under the Act in 1975 and that threats to the population are sufficiently minimized. Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000 - also likely to be proposed for delisting), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. Existing state management plans will protect Yellowstone grizzly bears and will allow them to connect to other grizzly populations if they are delisted now. Wyoming, Montana, and Idaho, the three states where Yellowstone grizzly bears live, plan to jointly manage Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600. NGO's should be celebrating the delisting and not challenging because of the support from hunters, state and federal wildlife agencies for the work that they have done to restore this population. I fully support delisting this GYE population of grizzly bears. Great job USFWS!	FWS-R6-ES-2016-0042-2637	Positive comments regarding population, scientific data, recovery, connectivity

Animal rights groups work on lawsuits and emotion, I have yet to see them finance any efforts towards habitat restoration but hunting conservation groups like RMEF have saved over 6 million acres of prime development land from ever being developed in key ecosystems and have had volunteers restore habitat and kill invasive weeds all to help manage a healthy ecosystem. Part of managing an ecosystem is management through hunting to keep healthy viable game numbers.	Miscellaneous	Please delist before emotion destroyed this great animal. The bear Scarface is a great example of an ecosystem overrun by large predators, he clearly was starving and had to leave the park. We'll see more and more similar encounters in the future and a human life should always be more important than an animal. With regulated hunting we will see further funding help establish the species with more money to put towards game management and habitat restoration. We do not want to see happen to the Grizzle what has happened in Africa due to animal rights emotions, people have cried out for one lion given a name while hundreds have been slaughtered by governments due to lack of habitat and further restrictions on hunting. If you look back in history, hunters have brought back many species from almost extinction and pay 90% of the funds that helped make this possible. Animal rights groups work on lawsuits and emotion, I have yet to see them finance any efforts towards habitat restoration but hunting conservation groups like RMEF have saved over 6 million acres of prime development land from ever being developed in key ecosystems and have had volunteers restore habitat and kill invasive weeds all to help manage a healthy ecosystem. Part of managing an ecosystem is management through hunting to keep healthy viable game numbers. Please delist so that better management can be done as we know only hunters put their money towards our wonderfully wildlife. We should all praise hunters as I have yet to see another group help out our wildlife like them. Delisting is the best thing for the Grizzly population.	FWS-R6-ES-2016-0042-2672	
This iconic bear creates millions of dollars of revenue for Wyoming, Montana and other states where tourists flock to see these remarkable animals in their natural habitat. These bears exist for the benefit of all Americans, not just those in the states where they reside. Removing them from Federal List and allowing them to be "managed" solely by individual states will surely result in significant reduction in numbers, through hunting or other "management" designed only for the benefit of a small segment of the state population - ranchers who utilize public lands for grazing.	Miscellaneous	I do not believe the Grizzly bear should be removed from the Federal List of Endangered and Threatened Wildlife. This iconic bear creates millions of dollars of revenue for Wyoming, Montana and other states where tourists flock to see these remarkable animals in their natural habitat. These bears exist for the benefit of all Americans, not just those in the states where they reside. Removing them from Federal List and allowing them to be "managed" solely by individual states will surely result in significant reduction in numbers, through hunting or other "management" designed only for the benefit of a small segment of the state population - ranchers who utilize public lands for grazing. Far better that we compensate ranchers for loss of livestock than subject the Grizzly to the type of "management" that will result in far fewer tourist dollars in the affected states and in the end reduce the number of wild Grizzlies back to an endangered level.	FWS-R6-ES-2016-0042-2688	Tourism / State Management / population
FWS says, the agency says it looks forward to hearing from the public about delisting. The truth is, the public has already made it's views known; A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium.	Miscellaneous	The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS. HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. In my opinion, HSUS is again correct. Look at the brutal treatment and killing contests involving wolves in these same three states. It is ugly and awful to be a Montanan who treasures wildlife and yet state governments want to use them for "sport" and as a profit center. FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS says, the agency says it looks forward to hearing from the public about delisting. The truth is, the public has already made it's views known; A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and fish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations." Like so many groups and interested members of the general public, I do NOT believe the FWS has the best interests of the public or OUR wildlife in mind with this proposal. It is simply yet another method of exploitation disguised as wildlife "management". I won't fall for it any longer!! PLEASE DO NOT DELIST THE GRIZZLY BEAR!	FWS-R6-ES-2016-0042-2695	
I oppose removal of protection of the Greater Yellowstone Ecosystem ("GYE") population of grizzly bears under the Endangered Species Act ("ESA"), as amended, 16 U.S.C. §§ 1531-1544, as proposed by the U. S. Fish & Wildlife Service ("FWS"), in the Federal Register on March 11, 2016, 81 Fed. Reg. 13174 et seq. (8/20/2016 PDR), for the reasons set forth below. I- The Rule of Law in the United States means that it and its citizens submit to a set of laws to govern behavior and to an independent judiciary to administer and enforce those laws. As Theodore Roosevelt said in 1903, "Ours is a government of liberty by, through and under law. No man is above it, and no man is below it." The Rule of Law protects the public from government abuse of power. U. S. Supreme Court Justice Felix Frankfurter wrote in a concurring opinion in United States v. United Mine Workers, 330 U.S. 258, 307-09, 312 (1947): "The historic phrase 'a government of laws and not of men' epitomized the distinguishing character of our political society. When John Adams put that phrase into the Massachusetts Declaration of Rights, pt. 1, art. 30, he was not indulging in a rhetorical flourish. He was expressing the aim of those who, with 'including about 90% from Idaho, Montana and Wyoming, opposed de-listing. 6 FWS disregarded that overwhelming sentiment and issued the 2007 FDR, which was invalidated in litigation as described above. The FWS justified its disregard on the ground that the public comments were not a "vote count" (AR 46683) or a "binding referendum" (Aland Case, Defendants' Response in Opposition to Plaintiffs Motion for Summary Judgment, Doc. 87, p. 18), even though the APA explicitly requires the FWS to consider "written data, views, or arguments" submitted by the public. The FWS's Grizzly Bear Recovery Coordinator, Dr. Servheen, who was primarily responsible for preparing the 2005 PDR, stated, arrogantly and dismissively, in an internal e-mail on May 30, 2006 (AR 05332): "if this all seems like a lot of comments and issues on 01.118c" draft rule, keep in mind there is an entire NGO "industry" devoted to grizzly bears and many of the comments were generated by people who were paid to comment and spend a lot of time digging up issues for the comments. The cynicism in that statement and disrespect for the APA comment process are palpable. The FWS's disregard of the public comments contravened the purpose of the APA; constituted extraordinary arrogance by federal officials representing the American public; and showed that the FWS will not be deterred by the requirements of the APA. It can reasonably be expected, based on this history, that a very large number of public comments will be filed with regard to the 2016 PDR; that those comments again will overwhelmingly oppose delisting the GYE grizzly bears; and that the FWS will ignore those comments and proceed in due course (probably by the end of 2016) to issue another rule removing the GYE grizzly bears' ESA protection. IV- A. Bollittig Influence The FWS is required by the ESA to make a delisting decision solely on the basis of the best available scientific and commercial data. 16 U.S.C. § 1533(b)(1)(A); 50 C.F.R. § 424.11(b). The FWS cannot rely upon "possible economic or other impacts" in making a delisting decision. 50 C.F.R. § 424.11(b). 6 The enormity of the public's participation in the 2005 - 2007 grizzly bear delisting process by submitting comments can be placed in perspective by considering the following statement by the court in Wilderness Society v. Rey, 180 F. Supp. 2d at 1143: "The number of comments in the administrative process, over 4,000, show the case is unusual in both public interest and public participation." 7 See Spirit of the Sage Council v. Norton, 294 F. Supp. 2d 67, 77-78 (D. C. D.C. 2003) (94% opposition; rule invalidated). - 5 - "The courts have held that political interference can contaminate an agency rule such as End Island Institute v. Hogarth, 484 F.3d 1123, 1134-35 (9th Cir. 2007) (political interference); Portland Audubon Society v. Oregon Lands Coalition, 984 F.2d 1534, 1543-48 (9th Cir. 1992) (political interference). See Latecoere Int'l Ac' Inc. v. U.S. Dept. of the Navy, 19 F.3d 1342 (11th Cir. 1994); Konig, Inc. v. Andrus, 580 F.2d 601, 610 (10th Cir. 1978), cert. denied, 439 U.S. 1052 (1978). (Congressional interference). Pillsbury Co. v. Federal Trade Comm'n, 354 F.2d 952 (5th Cir. 1966).	Miscellaneous	I oppose removal of protection of the Greater Yellowstone Ecosystem ("GYE") population of grizzly bears under the Endangered Species Act ("ESA"), as amended, 16 U.S.C. §§ 1531-1544, as proposed by the U. S. Fish & Wildlife Service ("FWS"), in the Federal Register on March 11, 2016, 81 Fed. Reg. 13174 et seq. (8/20/2016 PDR), for the reasons set forth below. I- The Rule of Law in the United States means that it and its citizens submit to a set of laws to govern behavior and to an independent judiciary to administer and enforce those laws. As Theodore Roosevelt said in 1903, "Ours is a government of liberty by, through and under law. No man is above it, and no man is below it." The Rule of Law protects the public from government abuse of power. U. S. Supreme Court Justice Felix Frankfurter wrote in a concurring opinion in United States v. 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The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and fish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations."	Miscellaneous	The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS. HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. In my opinion, HSUS is again correct. Look at the brutal treatment and killing contests involving wolves in these same three states. It is ugly and awful to be a Montanan who treasures wildlife and yet state governments want to use them for "sport" and as a profit center. FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. 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Lastly, the impact on visitation to Yellowstone will be negatively impacted (maybe not for the first year or two while people hurry to see grizzlies from the roadsides before that becomes a thing of the past). Common sense is that the grizzlies that enthrall and entertain people as they watch them from the roadside will be the first ones to go. Grizzlies in Yellowstone are habituated to the presence of humans in many areas. These bears will be slaughtered at close range. Shot with a high powered rifle instead of the Canon cameras of the past.	Miscellaneous	Delisting grizzlies in the GYE is a mistake. I have been visiting Yellowstone for over 15 years. I make the long trek from Southern California to Yellowstone every year; sometimes twice a year for one main reason. To hike the backcountry with the great bear. I am not a scientist. I have no "Hard Numbers" of data to offer to my argument. Just my experience as a hiker and overnight backpacker through the Pelican Valley, Mist Trail, Lamar Trail, Rim Trail, on and on. I can tell you this, seeing a grizzly in the backcountry is a life changing event. It puts humility back in humanity. It lets us know that (without high powered rifles) we are not the alpha predator. We have our brain and our opposable thumbs. Our Brain goes on "Hi Alert" when in grizzly country. Our opposable thumbs lift our backpacks at night to keep the bears from raiding our campsites. We hold bear spray with the situation arises. But in the moment, our daily problems disappear as our goal is to enjoy nature on NATURES TERMS. And, to me, the grizzly bear is the epitome of nature; of "The Wild." This is an animal that can kill a human at anytime if it choose to do so. It rarely; I mean RARELY does. And when it does, it is usually because we have made a mistake. We have not respected the great bear and the results can be deadly. Of course, even the most stupid human mistakes in bear country rarely result in injury, let alone death. I think it is clear that the jury is out on the status of the grizzly bear and its recovery status in the GYE. Scientists, groups on both sides (including the powerful attorneys) are set to battle no matter which decision is made. But what strikes me is that there are so few grizzlies in the lower 48 no matter what estimation, extrapolation is used. Are the grizzlies truly recovered enough to delist? Are some of the numbers of grizzlies located in genetically isolated areas that can not contribute to the ongoing survival of the species? What about the effects of our warming climate and the effect it has on the grizzlies food sources? I know that some scientists say that the lack of the White Bark Pine Nut has had a minimal impact because grizzlies are opportunistic and have adapted. Have they? Are we certain? Do we have enough data over a long enough period to KNOW this. Sadly, it is apparent to me that we as a society are willing to risk the loss of the great bear from the GYE. This is not about human safety as humans are (and should be allowed) to kill aggressive / problem bears. I have no problem with that (when it is properly investigated and legal action taken when the circumstances did not justify killing the grizzly). Montana, Wyoming and Idaho have a "Dog in the fight" because they are anxious to get the fees for grizzly tags. I'm all for states rights. But in this case, the grizzly bear simply is still at risk of extinction. There are too many "unknowns" in the calculations / extrapolations. The fact is, the only way to know the true health of the grizzly population is to have an accurate count of sows with cubs of the year. 750 grizzlies (the upper estimate) means nothing if the majority of these bears are male and/or females without cubs. What concerns me most is the FACT that pregnant sows MUST put on sufficient weight prior to hibernating. If they lack the fat reserves, they abort the fetus. If we have a major event that keeps the majority of sows from carrying and birthing cubs for one year, the impact on the overall population would be terrible at best and cataclysmic at worst. The plan is to put the grizzly back on the ESL if it falls below a certain threshold. It is entirely possible that a combination of killing 15% to 20% of the population combined with an unforeseen food source problem, it may be late. Lastly, the impact on visitation to Yellowstone will be negatively impacted (maybe not for the first year or two while people hurry to see grizzlies from the roadsides before that becomes a thing of the past). Common sense is that the grizzlies that enthrall and entertain people as they watch them from the roadside will be the first ones to go. Grizzlies in Yellowstone are habituated to the presence of humans in many areas. These bears will be slaughtered at close range. Shot with a high powered rifle instead of the Canon cameras of the past. I am calling on the government to give the benefit of the doubt to the grizzlies of the GYE. Or we may one day have signs telling visitors of the great bears the used to wonder Yellowstone as the alpha predator. Thank you for listening to my comments.	FWS-R6-ES-2016-0042-2640	
As an avid outdoorsman I would like to request you return the management of the grizzly bear to the state of Montana. The original intent of listing the grizzly has been accomplished and it is now time to allow the state to manage the wildlife in there area. We trust the Government has a valid reason when placing a species on the Endangered Species list, but we also trust that once the objective has been accomplished, the Government would remove the listing and put the management responsibility back to the states.	Miscellaneous	As an avid outdoorsman I would like to request you return the management of the grizzly bear to the state of Montana. The original intent of listing the grizzly has been accomplished and it is now time to allow the state to manage the wildlife in there area. We trust the Government has a valid reason when placing a species on the Endangered Species list, but we also trust that once the objective has been accomplished, the Government would remove the listing and put the management responsibility back to the states. Thanks for listening.	FWS-R6-ES-2016-0042-2738	Positive of delisting - allow States to manage; objective have been met

7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear, and Forest Service funding is expected to decline. The Forest Service already lacks the necessary funds to monitor habitat, and this problem will get worse. No one knows where the additional monies will come from to pay for implementation of the delisting plan.	Miscellaneous	1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. Forest Service has not yet finalized its forest plan amendments. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Under the new Bush administration rules, forest plan standards will be discretionary, rather than mandatory. That means that the Forest Service will enforce the rules if it feels like it. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. These lands include some of the most threatened habitat in the GYE, especially by energy development in Wyoming. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear, and Forest Service funding is expected to decline. The Forest Service already lacks the necessary funds to monitor habitat, and this problem will get worse. No one knows where the additional monies will come from to pay for implementation of the delisting plan. 8. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually.	FWS-R6-ES-2016-0042-2754	
I am against the delisting. Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal siting spiritual, scientific, political, and environmental objections to delisting. Let us start to treat the Native Americans as they should be treated and stop the racism that is happening to them when they tried to speak at the FWP meeting. I watched the video and was appalled and saddened.	Miscellaneous	I am against the delisting. Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal siting spiritual, scientific, political, and environmental objections to delisting. Let us start to treat the Native Americans as they should be treated and stop the racism that is happening to them when they tried to speak at the FWP meeting. I watched the video and was appalled and saddened.	FWS-R6-ES-2016-0042-2848	
De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected.	Miscellaneous	De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. Please do not De-list the grizzly bear and continue to protect our American wildlife heritage.	FWS-R6-ES-2016-0042-2832	
The economic impact of grizzlies being road friendly in Yellowstone is huge. Once they start being hunted, they will become less road friendly and there will be fewer visitors to Yellowstone.	Miscellaneous	I object to delisting the grizzly bear from the Endangered Species Act. Barring that, the delisting does not need to be accompanied by the legalization of trophy hunting for the following reasons: AS WE SAW WITH SCARFACE, BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. In 2015, record number of Yellowstone area grizzly bears were killed despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. Additionally, there are ranchers right outside of Yellowstone (in MT) who are practicing wildlife sustainable ranching. Rather than give ranchers a license to kill, can't we first ask that they try these methods? The economic impact of grizzlies being road friendly in Yellowstone is huge. Once they start being hunted, they will become less road friendly and there will be fewer visitors to Yellowstone. IF HUNTING IS ALLOWED, THERE MUST BE BUFFER ZONES around national parks and a no-hunt zone in between Yellowstone and Grand Teton National Park, minimally, and up through the Tom Miner Basin area in Montana. CLIMATE CHANGE NEEDS TO BE CONSIDERED. Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated at least one food source. USFWS needs to consider how climate change will impact bears' food sources and behavior. USFWS failed to do this with wolverines and had to have a court order USFWS to consider climate change in wolverine listing. Additionally, we can't say that we are being environmentally responsible and kill off apex predators. The environment does not stop with the flora but is equally impacted by the fauna, particularly apex predators. MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The outcry over the killing of Cecil the Lion by many Americans will be repeated here. We cannot object to the killing of Cecil and then less than a year later sanctify the right of hunters to do the exact same thing in the U.S. STATE CONFLICTS OF INTEREST. The states have not shown that they can work together to manage their apex predator populations, and several officials of the surrounding states have indicated that they wish to eradicate apex predators from their areas. These creatures don't know where state lines begin and end, and some of the most natural habitats for grizzlies are in decidedly unfriendly states. I am disappointed that under a Democratic president that U.S. Fish & Wildlife would even consider delisting which is the equivalent of unprotected our wildlife. While I appreciate that delisting shows that there has been some success in restoring the grizzly population in the lower 48, the sad fact is that it comes with a license to trophy hunt which is unfair after years of protection, and to a barely sustainable population of animals. It is one thing to hunt elk or deer which thrive in abundance, and which are then consumed but trophy hunting is ultimately about the act of killing an apex predator for bragging rights that it can be done. The meat is not eaten, the body is dismembered or stuffed and becomes a living room ornament on the floor or wall. Of course it can be done with our high powered weaponry to an animal that feeds in the open (just bring out an elk carcass in the right area and grizzlies will appear which is exactly what happened to Cecil the lion).	FWS-R6-ES-2016-0042-2859	

To think it's appropriate to take away the bear viewing opportunity of millions of people, coming from all over the world, to visit Yellowstone and Grand Teton National Parks, only to cater to the fractional less than 4% of wealthy trophy hunters, is to ignore the fact that there's a renewable, multi-million dollar tourism industry, pumping in millions upon millions of dollars into the region annually, contributing to the tax base for each of the 3 states. People visit to see Wolves, Grizzly Bears and down the list of most requested information I receive as a YNP staff member, are questions about when Old Faithful will erupt. It's also well known that the outdoor recreational folks are increasing exponentially, while the numbers of hunters are declining rapidly, as we move further into the 21st Century. If it's the funding that the USFWS need so desperately, perhaps they could look at being more accountable and seek out funding from alternative methods. Recently we attempted to establish a proposed Wolf Stamp in Montana, allowing the non-consumptive wolf watchers to contribute, more than tax dollars to the coffers. This would have easily funded at least one, if not two FW&P biologist staff positions, but was ultimately halted by the hunting and trapping groups, perhaps from fears they would then share the decision making process with the general public. Public Lands and wildlife belong to all Americans that pay taxes, it is our heritage and responsibility to be the very best stewards of that land. Too shortsighted and inadequately addressed to delist the Grizzly Bear at this time. DO NOT DELIST!	Miscellaneous	Since Grizzly Bears took years of Endangered Species protections to come back from the brink of extinction in the lower 48 states, to where we might be able to see one once again in Yellowstone, it seems far too soon to delist at this time. There are more issues than a population count can address, such as the ever changing environmental factors, coupled with bears very slow reproductive rate(2nd slowest breeding animal in the continent) and fragility of health contributing to reproduction uncertainties. Occupation of less than 2% of historic habitat, with pockets of protections from trapping and hunting, will lead to isolated populations. It's well known that, one can only continue to breed relatives, of any species, for so long before genetic problems begin to arise and threaten any sustainable population. Currently we have a prime example of this problem displayed in the Isle Royale Wolves of Michigan. Isolated on an island and without any genetic biodiversity, they display genetic mutations and are dying out, at last report, there were two left. To not allow safe travel from one preserve to another, will effectively reduce the Greater Yellowstone Ecosystem population of Grizzly Bears to such a perilous position. It's already public knowledge that Wyoming, Montana and Idaho planned all along to sell hunting tags to the less than 4% of the population that trophy hunts, as soon as delisting occurs. It was the lack of care from Wyoming's Game & Fish, that led to the listing in the first place, since they couldn't manage to stop the hunting even when the population was crashing. Why would we expect them to do any different now? We have seen how they have been unable to develop a viable Wolf Management plan, which recently led to the return of the ESA status in the state, but only after a lawsuit was initiated by conservationists had been filed and heard in the courts. Both Grand Teton and Yellowstone National Park Superintendents have publicly stated they oppose the delisting of the Grizzly Bear and they based their position upon the best available science from the experts in the field of Grizzly Bear knowledge and physical area in question, the biologists of the Parks, the best bear experts in the world. We are certain that climate changes are occurring and that science is evolving daily. We know that currently we live in what is called, The 6th Major Extinction on Earth, loosing more species in the last few years, than any there space in time since the dinosaurs died. We have also seen the Public Outrage over the trophy hunting of lions in Africa. The Yellowstone/Teton Grizzlies are just as famous, if not more so than Cecil the Lion. Ethically and morally it is wrong to kill any animal for a trophy. A 3 year study by USFWS, led by Chris Servheen, a known trophy hunter, affiliated with Safari Club International, is a biased and non-scientifically validated opinion, motivated by desire to hunt the bears. Never seen by the public, nor PEER reviewed by a panel of independent experts in the field, it is outrageously arrogant and shortsighted to accept any non-validated and transparent study. Amounting to nothing less than the Fox guarding the Hen House, this supposed study, would never make it to any Scientifically Valid Journals and probably the reason it's been hidden from anybody's view and evaluation. To think it's appropriate to take away the bear viewing opportunity of millions of people, coming from all over the world, to visit Yellowstone and Grand Teton National Parks, only to cater to the fractional less than 4% of wealthy trophy hunters, is to ignore the fact that there's a renewable, multi-million dollar tourism industry, pumping in millions upon millions of dollars into the region annually, contributing to the tax base for each of the 3 states. People visit to see Wolves, Grizzly Bears and down the list of most requested information I receive as a YNP staff member, are questions about when Old Faithful will erupt. It's also well known that the outdoor recreational folks are increasing exponentially, while the numbers of hunters are declining rapidly, as we move further into the 21st Century. If it's the funding that the USFWS need so desperately, perhaps they could look at being more accountable and seek out funding from alternative methods. Recently we attempted to establish a proposed Wolf Stamp in Montana -allowing the non-consumptive wolf watchers to contribute more than tax dollars to the coffers. This would have easily funded at least one, if not two	FWS-R6-ES-2016-0042-2819	
Additionally, we can't say that we are being environmentally responsible and kill off apex predators. The environment does not stop with the flora but is equally impacted by the fauna, particularly apex predators.	Miscellaneous	I object to delisting the grizzly bear from the Endangered Species Act. Barring that, the delisting does not need to be accompanied by the legalization of trophy hunting for the following reasons: AS WE SAW WITH SCARFACE, BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. In 2015, record number of Yellowstone area grizzly bears were killed despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. Additionally, there are ranchers right outside of Yellowstone (in MT) who are practicing wildlife sustainable ranching. Rather than give ranchers a license to kill, can't we first ask that they try these methods? The economic impact of grizzlies being road friendly in Yellowstone is huge. Once they start being hunted, they will become less road friendly and there will be fewer visitors to Yellowstone. IF HUNTING IS ALLOWED, THERE MUST BE BUFFER ZONES around national parks and a no-hunt zone in between Yellowstone and Grand Teton National Park, minimally, and up through the Tom Miner Basin area in Montana. CLIMATE CHANGE NEEDS TO BE CONSIDERED. Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated at least one food source. USFWS needs to consider how climate change will impact bears' food sources and behavior. USFWS failed to do this with wolverines and had to have a court order USFWS to consider climate change in wolverine listing. Additionally, we can't say that we are being environmentally responsible and kill off apex predators. The environment does not stop with the flora but is equally impacted by the fauna, particularly apex predators. MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The outcry over the killing of Cecil the Lion by many Americans will be repeated here. We cannot object to the killing of Cecil and then less than a year later sanctify the right of hunters to do the exact same thing in the U.S. STATE CONFLICTS OF INTEREST. The states have not shown that they can work together to manage their apex predator populations, and several officials of the surrounding states have indicated that they wish to eradicate apex predators from their areas. These creatures don't know where state lines begin and end, and some of the most natural habitats for grizzlies are in decidedly unfriendly states. I am disappointed that under a Democratic president that U.S. Fish & Wildlife would even consider delisting which is the equivalent of unprotecting our wildlife. While I appreciate that delisting shows that there has been some success in restoring the grizzly population in the lower 48, the sad fact is that it comes with a license to trophy hunt which is unfair after years of protection, and to a barely sustainable population of animals. It is one thing to hunt elk or deer which thrive in abundance, and which are then consumed but trophy hunting is ultimately about the act of killing an apex predator for bragging rights that it can be done. The meat is not eaten, the body is dismembered or stuffed and becomes a living room ornament on the floor or wall. Of course it can be done with our high powered weaponry to an animal that feeds in the open (just bring out an elk carcass in the right area and grizzlies will appear which is exactly what happened to Cecil the lion).	FWS-R6-ES-2016-0042-2859	

MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The outcry over the killing of Cecil the Lion by many Americans will be repeated here. We cannot object to the killing of Cecil and then less than a year later sanctify the right of hunters to do the exact same thing in the U.S.	Miscellaneous	I object to delisting the grizzly bear from the Endangered Species Act. Barring that, the delisting does not need to be accompanied by the legalization of trophy hunting for the following reasons: AS WE SAW WITH SCARFACE, BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. In 2015, record number of Yellowstone area grizzly bears were killed despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. Additionally, there are ranchers right outside of Yellowstone (in MT) who are practicing wildlife sustainable ranching. Rather than give ranchers a license to kill, can't we first ask that they try these methods? The economic impact of grizzlies being road friendly in Yellowstone is huge. Once they start being hunted, they will become less road friendly and there will be fewer visitors to Yellowstone. IF HUNTING IS ALLOWED, THERE MUST BE BUFFER ZONES around national parks and a no-hunt zone in between Yellowstone and Grand Teton National Park, minimally, and up through the Tom Miner Basin area in Montana. CLIMATE CHANGE NEEDS TO BE CONSIDERED. Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated at least one food source. USFWS needs to consider how climate change will impact bears' food sources and behavior. USFWS failed to do this with Wolverines and had to have a court order USFWS to consider climate change in wolverine listing. Additionally, we can't say that we are being environmentally responsible and kill off apex predators. The environment does not stop with the flora but is equally impacted by the fauna, particularly apex predators. MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The outcry over the killing of Cecil the Lion by many Americans will be repeated here. We cannot object to the killing of Cecil and then less than a year later sanctify the right of hunters to do the exact same thing in the U.S. STATE CONFLICTS OF INTEREST. The states have not shown that they can work together to manage their apex predator populations, and several officials of the surrounding states have indicated that they wish to eradicate apex predators from their areas. These creatures don't know where state lines begin and end, and some of the most natural habitats for grizzlies are in decidedly unfriendly states. I am disappointed that under a Democratic president that U.S. Fish & Wildlife would even consider delisting which is the equivalent of unprotecting our wildlife. While I appreciate that delisting shows that there has been some success in restoring the grizzly population in the lower 48, the sad fact is that it comes with a license to trophy hunt which is unfair after years of protection, and to a barely sustainable population of animals. It is one thing to hunt elk or deer which thrive in abundance, and which are then consumed but trophy hunting is ultimately about the act of killing an apex predator for bragging rights that it can be done. The meat is not eaten, the body is dismembered or stuffed and becomes a living room ornament on the floor or wall. Of course it can be done with our high powered weaponry to an animal that feeds in the open (just bring out an elk carcass in the right area and grizzlies will appear which is exactly what happened to Cecil the lion).	FWS-R6-ES-2016-0042-2859	
The position of bears generally and Grizzly bears specifically as keystone members of those ecosystems in which they reside is both well known and well documented. However, the entire breadth and width and tasks within these systems as yet is poorly documented and even more poorly understood. Perhaps it is the case that the most important as well as the very least understood is their role as seed dispersers. Considering the distances they travel, and the nature of their elimination in comparison to the large ruminants such as elk, deer, cattle, and every manner of sheep, it is nothing short of reckless the chance theuntoward effects courted by further reduction of their numbers in a time such as ours when fighting climate change and both zoologicaland botanical biodiversity resulting from our own human impacts upon northern temperate systems such as the Yellowstone region. Until such can be accomplished, further reduction of grizzly populations that increase the risk of their extinction in addition to courting other unidentified and undocumented effects on botanical and zoological biodiversity have been revealed and explicatedCurrently, wolves in the area are already greatly reduced and the partner effects of wolves and bears in pruning the yearly cropof ruminants with their impacts of over-grazing botanical resources, it is much more risk than we dare court,	Miscellaneous	"to keep every cog and wheel is the first precaution of intelligent tinkering" (Aldo Leopold) "Largely taken for granted, healthy ecosystems provide a variety of critical services. Created by the interactions of living organisms with their environment, these "ecosystem services" provide both the conditions and processes that sustain human life - purifying air and water, detoxifying and decomposing waste, renewing soil fertility, regulating climate, mitigating droughts and floods, controlling pests, and pollinating plants." ***[R]ecent research has demonstrated the extremely high costs to replace many of these services if they were to fail, on the order of many billions of dollars in the United States for water purification alone.*** Despite their obvious importance to our well being, ecosystem services have largely been ignored in environmental law and policy" Symposium, 20 Stanford Envtl. L.J. 309-536 (2001); NATURE'S SERVICES; SOCIETAL DEPENDENCE ON NATURAL ECO-SYSTEMS (Gretchen Daily ed., 1997). The position of bears generally and Grizzly bears specifically as keystone members of those ecosystems in which they reside is both well known and well documented. However, the entire breadth and width and tasks within these systems as yet is poorly documented and even more poorly understood. Perhaps it is the case that the most important as well as the very least understood is their role as seed dispersers. Considering the distances they travel, and the nature of their elimination in comparison to the large ruminants such as elk, deer, cattle, and every manner of sheep, it is nothing short of reckless the chance the untoward effects courted by further reduction of their numbers in a time such as ours when fighting climate change and both zoological and botanical biodiversity resulting from our own human impacts upon northern temperate systems such as the Yellowstone region. Until such can be accomplished, further reduction of grizzly populations that increase the risk of their extinction in addition to courting other unidentified and undocumented effects on botanical and zoological biodiversity have been revealed and explicated Currently, wolves in the area are already greatly reduced and the partner effects of wolves and bears in pruning the yearly crop of ruminants with their impacts of over-grazing botanical resources, it is much more risk than we dare court, as case law dating as far back to the US Supreme court of the 1800's and further yet, the federal government in its roll as fiduciaries of our wildlands and wildlife,, is charged with preserving both our wildlands and wildlife for current and future generations over any personal or commercial interests, including any losses of stockmen due to predation. This responsibility includes preserving wildlands and wildlife for ***BOTH*** current and all future generations of US Citizens.	FWS-R6-ES-2016-0042-2912	
While I appreciate that delisting shows that there has been some success in restoring the grizzly population in the lower 48, the sad fact is that it comes with a license to trophy hunt which is unfair after years of protection, and to a barely sustainable population of animals. It is one thing to hunt elk or deer which thrive in abundance, and which are then consumed but trophy hunting is ultimately about the act of killing an apex predator for bragging rights that it can be done. The meat is not eaten, the body is dismembered or stuffed and becomes a living room ornament on the floor or wall. Of course it can be done with our high powered weaponry to an animal that feeds in the open (just bring out an elk carcass in the right area and grizzlies will appear which is exactly what happened to Cecil the lion).	Miscellaneous	I object to delisting the grizzly bear from the Endangered Species Act. Barring that, the delisting does not need to be accompanied by the legalization of trophy hunting for the following reasons: AS WE SAW WITH SCARFACE, BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. In 2015, record number of Yellowstone area grizzly bears were killed despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. Additionally, there are ranchers right outside of Yellowstone (in MT) who are practicing wildlife sustainable ranching. Rather than give ranchers a license to kill, can't we first ask that they try these methods? The economic impact of grizzlies being road friendly in Yellowstone is huge. Once they start being hunted, they will become less road friendly and there will be fewer visitors to Yellowstone. IF HUNTING IS ALLOWED, THERE MUST BE BUFFER ZONES around national parks and a no-hunt zone in between Yellowstone and Grand Teton National Park, minimally, and up through the Tom Miner Basin area in Montana. CLIMATE CHANGE NEEDS TO BE CONSIDERED. Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated at least one food source. USFWS needs to consider how climate change will impact bears' food sources and behavior. USFWS failed to do this with Wolverines and had to have a court order USFWS to consider climate change in wolverine listing. Additionally, we can't say that we are being environmentally responsible and kill off apex predators. The environment does not stop with the flora but is equally impacted by the fauna, particularly apex predators. MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The outcry over the killing of Cecil the Lion by many Americans will be repeated here. We cannot object to the killing of Cecil and then less than a year later sanctify the right of hunters to do the exact same thing in the U.S. STATE CONFLICTS OF INTEREST. The states have not shown that they can work together to manage their apex predator populations, and several officials of the surrounding states have indicated that they wish to eradicate apex predators from their areas. These creatures don't know where state lines begin and end, and some of the most natural habitats for grizzlies are in decidedly unfriendly states. I am disappointed that under a Democratic president that U.S. Fish & Wildlife would even consider delisting which is the equivalent of unprotecting our wildlife. While I appreciate that delisting shows that there has been some success in restoring the grizzly population in the lower 48, the sad fact is that it comes with a license to trophy hunt which is unfair after years of protection, and to a barely sustainable population of animals. It is one thing to hunt elk or deer which thrive in abundance, and which are then consumed but trophy hunting is ultimately about the act of killing an apex predator for bragging rights that it can be done. The meat is not eaten, the body is dismembered or stuffed and becomes a living room ornament on the floor or wall. Of course it can be done with our high powered weaponry to an animal that feeds in the open (just bring out an elk carcass in the right area and grizzlies will appear which is exactly what happened to Cecil the lion).	FWS-R6-ES-2016-0042-2859	

With regard to that third consideration more generally, it is not clear that the agency take full account of the human environment of wild animals when they assign them a regulatory survival status. It's very fair for us to think of the situation of another species of mistrusted predator in the midst of hostile human neighbors, the re-introduced "Mexican" gray wolves of southern Arizona and New Mexico, a situation that has been poorly regulated and maintained and as a result remains highly insecure, especially because of failures to appreciate the behavior of human beings.	Miscellaneous	The proposal to remove the Yellowstone population of grizzly bears from status as endangered or threatened should not be recommended. The criteria that the agency have been using to make that recommendation are too narrow, so that the predicament of those bears is not fully appreciated. Three considerations seem to be outstanding. First, the bears in this region are finding it increasingly difficult to find decent food resources throughout the year, on account of the effects of climate change, including phenological effects in high-elevation ecosystems, and the alarming growth in the numbers of the mountain pine beetle. Secondly, the genetic diversity of these bears is not great, so the sustainability of the population as a whole is unusually insecure; in light of that, so far from their having to deal with being left with fewer protections, their population should be strengthened by finding increased protections for reliable migration corridors connecting their region to regions to the north where other grizzlies are thriving. Thirdly, the bears' human environment was never good: human neighbors mistrust them at best, or actively go about seeking their removal; hunters covet collecting their body-parts as trophies; and local and state governments lack the political will to protect them, if they're even aware that they need protecting, and are at all sympathetic to that cause. With regard to that third consideration more generally, it is not clear that the agency take full account of the human environment of wild animals when they assign them a regulatory survival status. It's very fair for us to think of the situation of another species of mistrusted predator in the midst of hostile human neighbors, the re-introduced "Mexican" gray wolves of southern Arizona and New Mexico, a situation that has been poorly regulated and maintained and as a result remains highly insecure, especially because of failures to appreciate the behavior of human beings. Those of us who hope for a strong and resilient population of grizzlies in the Yellowstone region, secure in their home and well-connected to other populations of their kind, dread the thought that they may be left in a predicament not unlike that of the Mexican wolves, with no human friends to help them secure their future, but rather having to rely on the tender mercies of neighbors who neither understand them nor sympathize with them nor even so much as like them.	FWS-R6-ES-2016-0042-2964	
Grizzly bear are a majestic species worth far more alive than dead. They bring tens of millions of dollars to the Northern Rockies states' economies each year. More than 4 million visitors went to Yellowstone and Grand Teton national parks in 2015 alone. Last year, Wyoming realized \$1.1 billion from national park-related revenues. This money helps a lot more people in these states. If someone shoots a grizzly bear, others cannot view or photograph it. Trophy hunters will stuff their dead bears, put their heads over their mantelpieces or turn them into bear skin rugs. That's just wrong. Wildlife belong to us all not just rich trophy hunters.	Miscellaneous	Grizzly bears are a slow-to-reproduce species one of the slowest in the animal kingdom. For instance, a mother grizzly bear spends up to four years raising and provisioning her young teaching them how to be bears. It's a huge investment of time, but if their mother gets killed by a trophy hunter, the her cubs will die from starvation or predation. Yellowstone grizzly bears should not be delisted because if they are, they will be subject to trophy hunting by the states of Wyoming, Montana and Idaho, which have already divided up the percentages of bears that can be hunted. Grizzly bear are a majestic species worth far more alive than dead. They bring tens of millions of dollars to the Northern Rockies states' economies each year. More than 4 million visitors went to Yellowstone and Grand Teton national parks in 2015 alone. Last year, Wyoming realized \$1.1 billion from national park-related revenues. This money helps a lot more people in these states. If someone shoots a grizzly bear, others cannot view or photograph it. Trophy hunters will stuff their dead bears, put their heads over their mantelpieces or turn them into bear skin rugs. That's just wrong. Wildlife belong to us all not just rich trophy hunters. Yellowstone grizzly bears need more protections not less right now, because their major staples, whitebark pine seeds and Yellowstone cutthroat trout, have declined precipitously. Please retain Yellowstone's grizzly bears on the Endangered Species List.	FWS-R6-ES-2016-0042-3002	
Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions.	Miscellaneous	Plans by the Bush administration to remove the grizzly bear from federal Endangered Species Act protection threaten to reverse a 30-year recovery that has resulted in doubling the bears' population in the greater Yellowstone ecosystem. If left to "management" by the states, trophy hunting of these magnificent animals in places like Wyoming and Montana will likely follow. While their numbers have risen to more than 600 individuals, the bears are geographically isolated, and threats to their habitat and food supplies are daunting. Most environmental groups, including the Sierra Club and the Natural Resources Defense Council, as well as wildlife biologists, are urging the U.S. Fish and Wildlife Service to abandon the delisting plan as premature. The grizzly bear once roamed free throughout the Western states, including 52 of California's 58 counties. Abundant in the Central Valley and North Bay in the 1800s, California grizzlies were also seen feasting on decaying whale carcasses along the shores of Monterey Bay. The last grizzly in California was shot by hunters in the 1920s, although it remains the familiar icon on our state flag. In state after state, ranchers and hunters wiped out local populations, until they were isolated in but a few small ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the greater Yellowstone population was estimated at 300 bears. Due to coordinated efforts by federal and state resources agencies mandated by the ESA, cooperative research, monitoring, habitat protections and regulatory mechanisms, including a strict hunting ban, their numbers have grown over the past 30 years to slightly more than 600 bears today, according to U.S. Fish and Wildlife's bear recovery coordinator, Chris Sverveen. This is a success story that must be acknowledged and celebrated. However, there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, dining for grubs and hunting.	FWS-R6-ES-2016-0042-3004	
If the cause of these beautiful animals is not enough to trouble you and persuade you to support their interests, keep in mind that Millions of grizzly-bear watching tourists spend tens of millions of dollars each year benefitting the local economies of the Northern Rockies. With the loss of its bears, Yellowstone National Park could lose \$10 million tourism dollars annually.	Miscellaneous	I am very disturbed to hear that the US Fish & Wildlife Service is considering the delisting of grizzly bears in the Great Yellowstone Ecosystem (GYE). According to statistics, at one time, grizzly bears ranged from northern Mexico to Alaska. In the early 1800s, as many as 50,000 grizzlies were found in the lower 48 states. Through hunting, humans have largely killed them off. Human-caused mortality is the single largest contributor of bear deaths. Today, their number has dropped to between 1,400 and 1,700. Of these numbers, only 674 to 839 are believed to be in the GYE in 2014. Even that small number may be an over-count, according to some biologists. We must protect these grizzly bears from extinction. If Federal protections are removed, state managers will open hunting seasons on GYE grizzly bears. The Idaho, Montana, and Wyoming wildlife managers will be responsible for what happens to these grizzlies. Many federal judges themselves have commented on how poorly these managers handled the wolf situation in their areas. These same state managers will also decide what types of hunting methods will be allowed. We must fight off any attempt to allow cruel and unsporting methods, such as hunting over bait and chasing bears with packs of GPS collared hounds. Trophy hunters, outfitters and guides, as well as livestock producers have been calling for grizzly hunting seasons for years. In fact, these wildlife managers have already laid plans to parcel out the GYE grizzlies to trophy hunters if they are delisted. Allowing these bears to be hunted would not only result in the direct deaths of the grizzlies who end up as rugs, but also the bears who escape the hunt and die from related injuries, as well as orphaned cubs unable to survive on their own. When hunting is allowed during the Fall, when the grizzlies are eating heavily to gain weight for hibernation, this costs the bears precious energy. This cost early in a female's life may negatively impact a lifetime of reproduction. Hunting directly affects population growth rates and can indirectly affect sex and age structure of a population and change social organization. Hunting causes greater changes in a population than do natural processes. Sixty percent of prominent grizzly bear scientists "believe delisting would be an incorrect decision, or at the very least a violation of the precautionary principle." Who are we to argue with the experts? Climate change and the loss of important food sources also concern bear biologists. If the cause of these beautiful animals is not enough to trouble you and persuade you to support their interests, keep in mind that Millions of grizzly-bear watching tourists spend tens of millions of dollars each year benefitting the local economies of the Northern Rockies. With the loss of its bears, Yellowstone National Park could lose \$10 million tourism dollars annually. (Source: Wilkinson, Todd. 2015. What's Next for Yellowstone's Grizzlies? National Geographic. October 1)	FWS-R6-ES-2016-0042-3100	

There needs to be a complete analysis of all effects as a result of the delisting. I urge you to no delist at this time, as there are many effects that need to be evaluated and in the case of climate change it is a likely foreseeable effect that will result in reduced habitat quality and quantity, changes in habitat spatial arrangement that could affect the species and reduced habitat quality due to greater resource extraction in areas that are now critical habitat for bear recovery.	Miscellaneous	Please, do not delist the Greater Yellowstone population of grizzlies from the Endangered Species list. The effects of this decision need to be analyzed for all likely foreseeable direct, indirect and cumulative effects on the species. This includes changes in land use as a result of the delisting including: hunting, change in land uses, logging, increased accidental and poaching of bears, reduced penalties for illegal kills that could lead to greater bear deaths, reduced breeding due to bear removal, greater stress on the bears that reduces reproduction, killing of sows and related reduction in reproduction and cumulative effects of climate change and increased resource extraction as a result of a decision to delist. There needs to be a complete analysis of all effects as a result of the delisting. I urge you to no delist at this time, as there are many effects that need to be evaluated and in the case of climate change it is a likely foreseeable effect that will result in reduced habitat quality and quantity, changes in habitat spatial arrangement that could affect the species and reduced habitat quality due to greater resource extraction in areas that are now critical habitat for bear recovery. I will talk to you in any format, you can call me at 509 6303594 or write me at 200 S. Kent Place East Wenatchee, Wa. 98802. Sincerely Kevin Kane	FWS-R6-ES-2016-0042-3036	
I believe that the USFWS failed to comply with executive and secretarial orders that effects on Native American religious or cultural tradition be considered when proposing changes to the ESA, and that the trophy hunts proposed in the state management plans that are necessary for federal delisting would be a violation of the American Indian Religious Freedom Act. The USFWS did not seek input from all of the 31 tribes recognized for historical ties to the GYE when drafting its latest delisting proposal, nor did it consider those tribes unanimous opposition to state management plans that include trophy hunting when they sought out the USFWS. By ignoring these comments and going forward with a delisting proposal contingent on state management plans that include trophy hunting, the USFWS has disrespected these native people and cultures, to say nothing of federal law.	Miscellaneous	I am against the U.S. Fish and Wildlife Service's (USFWS) proposal to remove the Greater Yellowstone Ecosystem's (GYE) population of grizzly bears from U.S. Endangered Species Act (ESA) protection. I believe that the USFWS failed to comply with executive and secretarial orders that effects on Native American religious or cultural tradition be considered when proposing changes to the ESA, and that the trophy hunts proposed in the state management plans that are necessary for federal delisting would be a violation of the American Indian Religious Freedom Act. The USFWS did not seek input from all of the 31 tribes recognized for historical ties to the GYE when drafting its latest delisting proposal, nor did it consider those tribes unanimous opposition to state management plans that include trophy hunting when they sought out the USFWS. By ignoring these comments and going forward with a delisting proposal contingent on state management plans that include trophy hunting, the USFWS has disrespected these native people and cultures, to say nothing of federal law. In the past, we have removed other species from Endangered Species Act protection without the need for a subsequent hunting season. This includes the American bald eagle. In 2007, nobody was calling for a bald eagle hunting season, because shooting a bald eagle would be a disgustingly disrespectful act towards an icon of our country. But for sovereign native nations like the Apsalooke, the Piegan, the Nee-Me-Poo, and others, the grizzly bear is more than just an icon, it is kin. These people deserve greater respect than to allow sport hunting of their kin. There are many other reasons to be against delisting, but this one is good enough for me.	FWS-R6-ES-2016-0042-5405	
In the past, we have removed other species from Endangered Species Act protection without the need for a subsequent hunting season. This includes the American bald eagle. In 2007, nobody was calling for a bald eagle hunting season, because shooting a bald eagle would be a disgustingly disrespectful act towards an icon of our country. But for sovereign native nations like the Apsalooke, the Piegan, the Nee-Me-Poo, and others, the grizzly bear is more than just an icon, it is kin. These people deserve greater respect than to allow sport hunting of their kin.	Miscellaneous	I am against the U.S. Fish and Wildlife Service's (USFWS) proposal to remove the Greater Yellowstone Ecosystem's (GYE) population of grizzly bears from U.S. Endangered Species Act (ESA) protection. I believe that the USFWS failed to comply with executive and secretarial orders that effects on Native American religious or cultural tradition be considered when proposing changes to the ESA, and that the trophy hunts proposed in the state management plans that are necessary for federal delisting would be a violation of the American Indian Religious Freedom Act. The USFWS did not seek input from all of the 31 tribes recognized for historical ties to the GYE when drafting its latest delisting proposal, nor did it consider those tribes unanimous opposition to state management plans that include trophy hunting when they sought out the USFWS. By ignoring these comments and going forward with a delisting proposal contingent on state management plans that include trophy hunting, the USFWS has disrespected these native people and cultures, to say nothing of federal law. In the past, we have removed other species from Endangered Species Act protection without the need for a subsequent hunting season. This includes the American bald eagle. In 2007, nobody was calling for a bald eagle hunting season, because shooting a bald eagle would be a disgustingly disrespectful act towards an icon of our country. But for sovereign native nations like the Apsalooke, the Piegan, the Nee-Me-Poo, and others, the grizzly bear is more than just an icon, it is kin. These people deserve greater respect than to allow sport hunting of their kin. There are many other reasons to be against delisting, but this one is good enough for me.	FWS-R6-ES-2016-0042-5405	
Much more work is needed in the GYE to prevent many of unnecessary grizzly deaths before this population can be safely delisted. Such actions as requiring ranchers to relocate their garbage and carcass dumps to secure county facilities, the use of bear-proof garbage cans in communities within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for public land users, and stiffer penalties for illegal killings need to be employed within the GYE prior to grizzlies being delisted.	Miscellaneous	I live within the Greater Yellowstone Ecosystem (GYE) and am apposed to delisting grizzly bears in the GYE for the following reasons: 1. Fact is, no one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services computer generated numbers. But, what we do emphatically know is that at least 60 grizzlies died last year and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest reproductive rate of any mammal in the GYE. The continuation of such high mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work is needed in the GYE to prevent many of unnecessary grizzly deaths before this population can be safely delisted. Such actions as requiring ranchers to relocate their garbage and carcass dumps to secure county facilities, the use of bear-proof garbage cans in communities within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for public land users, and stiffer penalties for illegal killings need to be employed within the GYE prior to grizzlies being delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate grizzlies from other populations into the GYE to improve genetic diversity, but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat and prevent them from colonizing other lands in which they were originally found. This "discouragement" will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of the land grizzlies would be "discouraged" from is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. For the future survival of this isolated population occupation of additional habitat is crucial to their long-term survival. In this case, size does matter! Additional habitat will likely incorporate additional diversity of habitat types and harbor a greater variety food sources for grizzlies. Providing additional habitat to these large carnivores with enormous territorial needs is essential to their long-term survival. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout, and even army cutworm moth populations (due to Midwest farmers spraying the larvae with insecticides) have all been noted. These high calorie food deficits represent a severe loss for those grizzlies that once feasted on these nutritional foods. More research is needed to determine how the loss of these food sources (and likely others) will impact the future GYE grizzly population. Add in drought and climate change and much more information needs to be obtained to determine how all these factors will impact the future of the GYE grizzly population. 4. GYE Grizzlies should be managed as an ecosystem population rather than separately by three different state agencies all of which are subject to heavy political pressures from those wanting to rid the area of grizzlies and all of which have stated their intent to significantly reduce the population and limit their occupied habitat. The Fish & Wildlife Service indicates that the bears are expected to adapt and cope with these new realities. Shouldn't we too, with our very large brains, be expected to adapt to grizzlies? Many peoples around the world have learned how to cooperatively live with bears. People living in the GYE can too. 5. Recent studies have shown that GYE Grizzly Bears are a currently important and significantly rising economic resource to GYE communities. Yellowstone National	FWS-R6-ES-2016-0042-3124	

On behalf of the 56,107 members of the Network Groups: Heart of the Wild Yellowstone Vote4Wilderness Save Bears Now Southern Colorado Environmental CouncilSave Wyoming Wolves Now Save Wolves Now Network community All Animals Deserve to Live Keep Wolves Alive community Running with Wolves, Wildlife and NativesWolves Living Free, Respected and Protected Campaign for Yellowstone's Wolves Canadian and American Grassroots for Wolves	Miscellaneous	PART 2 OF OUR OFFICIAL COMMENT: -In Wyoming, Montana and Idaho, the snow pack was average and the temperatures high for this time of year. Acknowledging the possible threat of wildfires in the Greater Yellowstone ecosystem as was experienced in Glacier National Park this past year would be catastrophic for the grizzlies. -What's the rush? There are too many unknowns right now, regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population. Why not wait five years to see how the population is responding to these threats? -Grizzly bears have one of the lowest reproductive rates of all terrestrial mammals in North America.This is due to numerous ecological factors. Grizzly bears do not reach sexual maturity until they are at least five years old. Once mated with a male in the summer, the female delays embryo implantation until hibernation, during which miscarriage can occur if the female does not receive the proper nutrients and caloric intake. On average, females produce two cubs in a litter and the mother cares for the cubs for up to two years, during which time the mother will not mate. Once the young leave or are killed, females may not produce another litter for three or more years, depending on environmental conditions. Male grizzly bears have large territories, finding a female scent difficult in such low population densities. Population fragmentation of grizzlies may destabilize their number. The grizzly bear has several relationships with its ecosystem. One such relationship is a mutualistic relationship with fleshy-fruit bearing plants. After the grizzly consumes the fruit, the seeds are excreted and thereby dispersed in a germinable condition. Some studies have shown germination success is indeed increased as a result of seeds being deposited along with nutrients in feces. This makes grizzly bears important seed distributors in their habitats. While foraging for tree roots, plant bulbs, or ground squirrels, bears stir up the soil. This process not only helps grizzlies access their food, but also increases the species richness in alpine ecosystems. An area that contains both bear digs and undisturbed land has greater plant diversity than an area that contains just undisturbed land. Along with increasing species richness, soil disturbance causes nitrogen to be dug up from lower soil layers, and makes nitrogen more readily available in the environment. An area that has been dug by the grizzly bear has significantly more nitrogen than an undisturbed area. Grizzlies directly regulate prey populations and also help prevent overgrazing in forests by controlling the populations of other species in the food chain. An experiment in Grand Teton National Park in Wyoming showed that the removal of wolves and grizzly bears caused populations of their herbivorous prey to increase. This, in turn, changed the structure and density of plants in the area, which decreased the population sizes of migratory birds.This provides evidence that grizzly bears represent a keystone predator, having a major influence on the entire ecosystem they inhabit. One of the most important points to also include is that upon further research we do NOT feel that the Endangered Species Act is being followed as far as the NECESSARY CRITERIA HAS NOT BEEN MET TO INSURE THE SUSTAINABILITY OF THE GRIZZLY IN THE GREATER YELLOWSTONE REGION in the delisting of an endangered species from the list. It is sad that this proposed delisting is political based and not science based. At this time, in reflection of the above points we have made in both part one and part two, regarding the proposed delisting of the Grizzly, we DO NOT agree with the proposal to delist the Grizzly in the Greater Yellowstone Region and urge USFWS to postpone this proposal to delist them at this time. On behalf of the 56,107 members of the Network Groups: Heart of the Wild Yellowstone Vote4Wilderness Save Bears Now Southern Colorado Environmental Council Save Wyoming Wolves Now Save Wolves Now Network community All Animals Deserve to Live Keep Wolves Alive community Running with Wolves, Wildlife and Natives Wolves Living Free, Respected and Protected Campaign for Yellowstone's Wolves Canadian and American Grassroots for Wolves	FWS-R6-ES-2016-0042-3155	Comparison of wolf vs bear
Also, they are an apex predator of the Yellowstone ecosystem. They are necessary for a continued healthy ecosystem there.and in other states.	Miscellaneous	The Yellowstone grizzlies have not had a long enough recovery period to expand out their population into neighboring areas to allow for diversification and the strengthening of their gene pool. They are still in small and isolated numbers. Also, they are an apex predator of the Yellowstone ecosystem. They are necessary for a continued healthy ecosystem there.and in other states. The grizzly bears are truly iconic to Yellowstone and to a number of other northern states. Tourists bring great and needed revenue to states in which grizzlies, wolves and bison exist. Tourists from other countries also want to come to Yellowstone and other northern states to see these popular and magnificent icons of America! Please use scientific information and evidence in this very highly important decision and not listen to the greed of those who do not consider the importance or even the lives of these great animals! These animals and all species are critically important to Yellowstone and to our nation! They were not put on the earth to become someone's rug or trophy! They exist to perform their purpose of existence. Thank you for your informed and concerned determination of this highly important decision.	FWS-R6-ES-2016-0042-3194	
The grizzly bears are truly iconic to Yellowstone and to a number of other northern states. Tourists bring great and needed revenue to states in which grizzlies, wolves and bison exist. Tourists from other countries also want to come to Yellowstone and other northern states to see these popular and magnificent icons of America!	Miscellaneous	The Yellowstone grizzlies have not had a long enough recovery period to expand out their population into neighboring areas to allow for diversification and the strengthening of their gene pool. They are still in small and isolated numbers. Also, they are an apex predator of the Yellowstone ecosystem. They are necessary for a continued healthy ecosystem there.and in other states. The grizzly bears are truly iconic to Yellowstone and to a number of other northern states. Tourists bring great and needed revenue to states in which grizzlies, wolves and bison exist. Tourists from other countries also want to come to Yellowstone and other northern states to see these popular and magnificent icons of America! Please use scientific information and evidence in this very highly important decision and not listen to the greed of those who do not consider the importance or even the lives of these great animals! These animals and all species are critically important to Yellowstone and to our nation! They were not put on the earth to become someone's rug or trophy! They exist to perform their purpose of existence. Thank you for your informed and concerned determination of this highly important decision.	FWS-R6-ES-2016-0042-3194	
5. Recent studies have shown that GYE Grizzly Bears are a currently important, and significantly rising economic resource to GYE communities. Yellowstone National Park visitors listed grizzlies and wolves as the two most important species they want to be able to observe due to their scarcity and popularity. Many national park visitors come specifically to see these apex predators. Live x grizzlies are likely the most economically valuable animals in the x GYE.	Miscellaneous	I live within the Greater Yellowstone Ecosystem (GYE) and am apposed to delisting grizzly bears in the GYE for the following reasons: 1. Fact is, no one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services computer generated numbers. But, what we do emphatically know is that at least 60 grizzlies died last year and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest reproductive rate of any mammal in the GYE. The continuation of such high mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work is needed in the GYE to prevent many of unnecessary grizzly deaths before this population can be safely delisted. Such actions as requiring ranchers to relocate their garbage and carcass dumps to secure county facilities, the use of bear-proof garbage cans in communities within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for public land users, and stiffer penalties for illegal killings need to be employed within the GYE prior to grizzlies being delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate grizzlies from other populations into the GYE to improve genetic diversity, but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publicly stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat and prevent them from colonizing other lands in which they were originally found. This "discouragement" will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of the land grizzlies would be "discouraged" from is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. For the future survival of this isolated population occupation of additional habitat is crucial to their long-term survival. In this case, size does matter! Additional habitat will likely incorporate additional diversity of habitat types and harbor a greater variety food sources for grizzlies. Providing additional habitat to these large carnivores with enormous territorial needs is essential to their long-term survival. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout, and even army cutworm moth populations (due to Midwest famers spraying the larvae with insecticides) have all been noted. These high calorie food deficits represent a severe loss for those grizzlies that once feasted on these nutritional foods. More research is needed to determine how the loss of these food sources (and likely others) will impact the future GYE grizzly population. Add in drought and climate change and much more information needs to be obtained to determine how all these factors will impact the future of the GYE grizzly population. 4. GYE Grizzlies should be managed as an ecosystem population rather than separately by three different state agenciesall of which are subject to heavy political pressures from those wanting to rid the area of grizzlies and all of which have stated their intent to significantly reduce the population and limit their occupied habitat. The Fish & Wildlife Service indicates that the bears are expected to adapt and cope with these new realities. Shouldn't we too, with our very large brains, be expected to adapt to grizzlies? Many peoples around the world have learned how to cooperatively live with bears. People living in the GYE can too. 5. Recent studies have shown that GYE Grizzly Bears are a currently important, and significantly rising economic resource to GYE communities. Yellowstone National Park visitors listed grizzlies and wolves as the two most important species they want to be able to observe due to their scarcity and popularity. Many national park visitors come specifically to see these apex predators. Live x grizzlies are likely the most economically valuable animals in the x GYE. I oppose any delisting of Yellowstone Grizzly Bears from the Endangered / Threatened listing. Bears are not trophies. These animals are essential for ecosystems to thrive. In fact, they (along with Wolves and Buffaloes) bring in millions in Ecotourism.	FWS-R6-ES-2016-0042-3124	
they (along with Wolves and Buffaloes) bring in millions in Ecotourism.	Miscellaneous	5. Recent studies have shown that GYE Grizzly Bears are a currently important, and significantly rising economic resource to GYE communities. Yellowstone National Park visitors listed grizzlies and wolves as the two most important species they want to be able to observe due to their scarcity and popularity. Many national park visitors come specifically to see these apex predators. Live x grizzlies are likely the most economically valuable animals in the x GYE. I oppose any delisting of Yellowstone Grizzly Bears from the Endangered / Threatened listing. Bears are not trophies. These animals are essential for ecosystems to thrive. In fact, they (along with Wolves and Buffaloes) bring in millions in Ecotourism.	FWS-R6-ES-2016-0042-3231	

And millions of taxpayer dollars? This, even when a majority of taxpayers - 55% - oppose delisting.Indeed, even more, 68% of Americans oppose hunting. Which begs the question, why will hunting be allowed just because the bears are delisted? When bald eagles were delisted, no hunting was permitted. It does not makes sense to ignore science and public opinion to allow hunting of a species that took decades and millions of dollars to recover (if they are indeed recovered).	Miscellaneous	Please keep grizzly bears protected under the Endangered Species Act. In 41 years, the grizzly population increased from 150 to 700 bears. That is 13 bears a year. Further, population growth has plateaued in recent years. And now this population will be that could be wiped out by trophy hunters and ranchers now. 13 bears a year? And millions of taxpayer dollars? This, even when a majority of taxpayers - 55% - oppose delisting. Indeed, even more, 68% of Americans oppose hunting. Which begs the question, why will hunting be allowed just because the bears are delisted? When bald eagles were delisted, no hunting was permitted. It does not makes sense to ignore science and public opinion to allow hunting of a species that took decades and millions of dollars to recover (if they are indeed recovered). I therefore oppose delisting of grizzly bears from the Greater Yellowstone Ecosystem. Further, if the bears are delisted, I request that a moratorium on hunting be put in place for at least 5 years and that buffer zones around the parks be established.	FWS-R6-ES-2016-0042-3256	
Grizzly bears are magnificent creatures, a source of awe and wonder for millions of visitors to the Yellowstone Region every year.	Miscellaneous	See Attached Attachments Regele Susan	FWS-R6-ES-2016-0042-3272	
DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears. - GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, it is particularly vulnerable to excessive killing by humans. Last year, saw 59 grizzlies killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow reproducing species. - NEARLY 50 TRIBES OPPOSE DELISTING OF GRIZZLIES. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly oppose delisting and hunting of these bears, which they consider to be sacred animals. - EXPERTS OPPOSE REMOVING GRIZZLIES FROM THE ENDANGERED SPECIES LIST. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted. Based on what I've learned, the PEOPLE don't want this...so why are you working against the same people who put you in office. People who keep you employed. If the American population doesn't want this and experts are saying we shouldn't do it, then why are you? That's the question you need to ask yourself. Are you being fueled by money, unethical money, lack of morals? I think you need to get your ego checked. Stop thinking mankind if above animals because we are not. All Lives Matter. Anything that breaths feels and knows what is happening. Plus bears are very docile - they don't attack people, so why are YOU scared of them? What are YOU scared of that makes you want to delist them?	Miscellaneous	DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears. - GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, it is particularly vulnerable to excessive killing by humans. Last year, saw 59 grizzlies killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow reproducing species. - NEARLY 50 TRIBES OPPOSE DELISTING OF GRIZZLIES. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly oppose delisting and hunting of these bears, which they consider to be sacred animals. - EXPERTS OPPOSE REMOVING GRIZZLIES FROM THE ENDANGERED SPECIES LIST. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted. Based on what I've learned, the PEOPLE don't want this...so why are you working against the same people who put you in office. People who keep you employed. If the American population doesn't want this and experts are saying we shouldn't do it, then why are you? That's the question you need to ask yourself. Are you being fueled by money, unethical money, lack of morals? I think you need to get your ego checked. Stop thinking mankind if above animals because we are not. All Lives Matter. Anything that breaths feels and knows what is happening. Plus bears are very docile - they don't attack people, so why are YOU scared of them? What are YOU scared of that makes you want to delist them?	FWS-R6-ES-2016-0042-3247	
NEARLY 50 TRIBES OPPOSE DELISTING OF GRIZZLIES. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly oppose delisting and hunting of these bears, which they consider to be sacred animals.	Miscellaneous	DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears. - GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, it is particularly vulnerable to excessive killing by humans. Last year, saw 59 grizzlies killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow reproducing species. - NEARLY 50 TRIBES OPPOSE DELISTING OF GRIZZLIES. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly oppose delisting and hunting of these bears, which they consider to be sacred animals. - EXPERTS OPPOSE REMOVING GRIZZLIES FROM THE ENDANGERED SPECIES LIST. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted. Based on what I've learned, the PEOPLE don't want this...so why are you working against the same people who put you in office. People who keep you employed. If the American population doesn't want this and experts are saying we shouldn't do it, then why are you? That's the question you need to ask yourself. Are you being fueled by money, unethical money, lack of morals? I think you need to get your ego checked. Stop thinking mankind if above animals because we are not. All Lives Matter. Anything that breaths feels and knows what is happening. Plus bears are very docile - they don't attack people, so why are YOU scared of them? What are YOU scared of that makes you want to delist them?	FWS-R6-ES-2016-0042-3247	
The rate of the bears grew at 13 bears over 41 years. Yet last year 61 bears were killed. 18 of those are still under investigation. In the three years before that there were 44, 50, and 31 dead bears respectively. These numbers do not add up. This is not about the Grizzlies. I do not trust the FWP to manage the bears based on their past history. Idaho puts radio collars on Wolves instead of elk and says it was confused. Do they think we lack a brain? Most species removed from the Endangered Species List are, in fact, NOT hunted. Consider the bald eagle? Delisting is not synonymous with sport hunting.	Miscellaneous	I am against the delisting of Grizzlies. The rate of the bears grew at 13 bears over 41 years. Yet last year 61 bears were killed. 18 of those are still under investigation. In the three years before that there were 44, 50, and 31 dead bears respectively. These numbers do not add up. This is not about the Grizzlies. I do not trust the FWP to manage the bears based on their past history. Idaho puts radio collars on Wolves instead of elk and says it was confused. Do they think we lack a brain? Most species removed from the Endangered Species List are, in fact, NOT hunted. Consider the bald eagle? Delisting is not synonymous with sport hunting.	FWS-R6-ES-2016-0042-3288	
Visitors to Yellowstone and Grand Teton National Parks provide hundreds of millions of dollars to the local economy and one of the main reasons for their visitation is to see live grizzly bears. I realize the ESAs purpose is not to provide economic stimulus, however, there is little doubt if grizzly bear hunts are allowed, less opportunity for bear observations will occur.	Miscellaneous	The IGBC has worked tirelessly for the recovery of grizzlies for many years and their population has increased a modest amount since 1975 when they were initially listed and I commend their efforts. I ask the question, what is the purpose and need to delist the GYE grizzly. I worked for the BLM my entire career and I know the pressure to delist species so management activities can go forward. I know the states have put pressure to allow their agencies to take over management, but let's let science decide and leave the politics to the politicians. Here is the need to continue the protection of GYE grizzly bears: 1. Grizzlies reproduce at one of the slowest pace of any large mammal in the US, so any loss of adult females would significantly adversely affect their overall population. 2. Even though grizzlies eat a wide variety of foods, the majority rely on whitebark pine seeds while others rely on Yellowstone cutthroat trout which have both significantly declined in recent years. These losses result in grizzlies looking for alternate high protein and fat food sources which may be one of the reasons why human caused grizzly deaths are on the increase. 3. Visitors to Yellowstone and Grand Teton National Parks provide hundreds of millions of dollars to the local economy and one of the main reasons for their visitation is to see live grizzly bears. I realize the ESAs purpose is not to provide economic stimulus, however, there is little doubt if grizzly bear hunts are allowed, less opportunity for bear observations will occur. 4. By continuing the protection, the grizzly gene pool will be maintained or improved. Furthermore, as they continue to expand their home ranges, their natural migration into the Bitterroot Mountains and Northern Continental Divide would be enhanced, instead of the continual isolation of the GYE. 5. Conflicts between grizzlies and humans are mainly due to livestock predation and hunter encounters. Their continued protection would put the onus on us, requiring us to learn how to live with them instead of them bearing our faults. There are ranchers living among grizzlies that have had few or no conflicts with bears for years because they have learned how to alter their practices. We know how to reduce human/grizzly conflicts, but if delisted, the indiscriminate killing (eventual hunting) would do little to reduce these conflicts. Grizzlies have two main needs, to eat and breed. Their main food sources before winter fat up are significantly declining and any loss of adult bears and especially breeding females would adversely affect their population and continued recovery. One of the greatest moments of my life occurred while hiking in Glacier NP and had a close encounter with a grizzly. Their presence on the wild landscape is an indicator of a fully functioning ecosystem and until they disperse to other recovery zones, there is no need to delist them.	FWS-R6-ES-2016-0042-3293	

The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the x bears have been removed from 99 percent of their historic range by x the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, digging for grubs and hunting prey. Seeing a grizzly bear in the wild is usually an experience that remains with you for life. A	Miscellaneous	The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, digging for grubs and hunting prey. The bears in the greater Yellowstone ecosystem need its help, and yours, to continue on their road to recovery. There are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival.	FWS-R6-ES-2016-0042-3349			
Critics of the USFWS proposal say that lifting protections for the bear could endanger a growing population, and a lot of the US Public believe that also. A The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to an estimated 700 or more today. But grizzly bears have all but disappeared from almost all of the continental United States, except for Yellowstone and Glacier National Park and a few other slivers of habitat, the New York Times reported May 3.	Miscellaneous	We must immediately stop the U.S. Fish and Wildlife Service (USFWS) from removing the grizzly bear in the Greater Yellowstone Ecosystem Montana, Idaho and Wyoming from the Federal Lists of Endangered and Threatened Wildlife. They must not delist the Yellowstone grizzly bear.. Critics of the USFWS proposal say that lifting protections for the bear could endanger a growing population, and a lot of the US Public believe that also. The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to an estimated 700 or more today. But grizzly bears have all but disappeared from almost all of the continental United States, except for Yellowstone and Glacier National Park and a few other slivers of habitat, the New York Times reported May 3. After all I have read I wonder if the delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that I sternly oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. We cannot let humans jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. I also read that the author of the report that led to the delisting proposal, Dr. Christopher Servheen, grizzly bear recovery coordinator, U.S. Fish and Wildlife Service, admits private land development is the greatest threat to the nation's grizzlies, as further development could cut off connectivity among populations and disrupt vital habitat. Please do what is right and scientifically backed and don't delist the grizzly bear because it would be the beginning of the end for them. Thank you for your time and consideration on this very important issue.	FWS-R6-ES-2016-0042-3441			
I support fully the opposition to delisting of 50 Native American tribes to whom the bear is a spiritual and sacred animal which should not be subjected to the aggression of trophy hunters. Failure to respect the beliefs of the First Americans is at the least disrespectful and undemocratic and at worst symptomatic of colonialist oppression.	Miscellaneous	I stand in support of the letter submitted by Jane Goodall and others opposing the proposed delisting of the grizzly bear in Greater Yellowstone. Rigorous scientific evidence related to the bears' diminishing food sources and the effects of climate change must not be ignored. In addition I support fully the opposition to delisting of 50 Native American tribes to whom the bear is a spiritual and sacred animal which should not be subjected to the aggression of trophy hunters. Failure to respect the beliefs of the First Americans is at the least disrespectful and undemocratic and at worst symptomatic of colonialist oppression. Attachments GB-ScientistFinal5-5-16	FWS-R6-ES-2016-0042-3481			
I think it's too early to legalize bear hunting. I think people are reacting to the change in their businesses (like the dearth of skiing) and bad general economics by demanding new ways to make money. This pressure is going to continue for decades. Commodification of game animals is always a political plus for some people, and an atrocity to other people. It's hard to steer a sensible middle-course and it's scary when the bears are coming to town. But I think it's important to hold the line a while longer until we know more about managing grizzlies than shooting and bear spray.	Miscellaneous	I've hugged a lot of grizzly bears because when they're dead and you're ready to skin them, you can only move them by getting a good grip. I was married to a taxidermist. I know a lot about the economics of the trophy business, the psychology of guys who fly-in to cross the continent to prove their balls. Since we had a museum with a mounted rearing, roaring griz, I know a lot about people who think it is funny to steal the rubber tongue. Since Bob Scriver was also a sculptor who made a portrait of Gentle Ben, I know a little about griz show biz. Quite a lot like politics. When I was out at the trash roll-off this morning (5/7), Shannon came alongside, excited to tell us about the griz hanging around Valier a few miles out. He'd been about fifteen feet away from it and went back to get his wife, who longs to see a griz. The Hutterites on the rez have been complaining about griz in their cows, but the Blackfeet Fish and Game haven't been able to shoot it yet. The idea is to pick out "bad" habituated bears, not trophy bears. And a little accurate shooting might not be a bad thing keep those bears wary. I know very little about Yellowstone grizzlies. I know quite a lot about Glacier Park Grizzlies. When you live in Heart Butte, where I taught on the high east slope of the rez, they teach you to pound on the side of a dumpster before you throw in your trash, so as to spook the bears out first. Often we could see griz going along peacefully on the side of Heart Butte. I used to sneak into the Montana Bear and Wolf meetings of professionals when Jonkel was active. You had to have some kind of a contact to find them, because the general public is so irrational in a dozen different ways, ranging from believing that bears love them the way they love bears, to seeing them as devils in fur that should be eliminated, to wanting a bear rug in their rumpus room to prove their testosterone level until they stub their toe on the bear's open mouth. I helped make a diorama about a grizzly turning over high mountain rocks in order to catch the small mammals that live there. Those small marmots and pikas are already endangered by climate change. The temps are too warm, the snow is too scarce, the seasons are out of synchrony. Bears eat them. Of course, bears eat as much vegetable matter as prey those big claws are garden rakes. The vegetation is also changing. I think it's too early to legalize bear hunting. I think people are reacting to the change in their businesses (like the dearth of skiing) and bad general economics by demanding new ways to make money. This pressure is going to continue for decades. Commodification of game animals is always a political plus for some people, and an atrocity to other people. It's hard to steer a sensible middle-course and it's scary when the bears are coming to town. But I think it's important to hold the line a while longer until we know more about managing grizzlies than shooting and bear spray. It's really more about managing politicians or even Supreme Court justices. Hunting can become a secret society.	Miscellaneous		FWS-R6-ES-2016-0042-3495	
Listen to the voices of scientists who have appealed to your poor and biased decision to remove the bears from esa protection. Listen to the comments from the public which are overwhelmingly against delisting Grizzlies.	Miscellaneous	I am opposed to delisting the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal list of endangered species. The decision is premature and does not adequately factor in the decline of their main food sources due to climate change. There is no scientific reason to hunt Grizzly Bears, they are slow to reproduce and need protection, not targets on their back for the benefit of the constantly declining special interests of trophy hunters. Listen to the voices of scientists who have appealed to your poor and biased decision to remove the bears from esa protection. Listen to the comments from the public which are overwhelmingly against delisting Grizzlies. Stop listening to the diminished and shrieking voices of the minority who find pleasure in killing public wildlife for their own sick personal benefit.	FWS-R6-ES-2016-0042-3525			

National Parks belong to everyone, just as the grizzly bears belong to everyone within those parks, not to someone who pays to kill it. I want to be able to enjoy the bears. Ask someone how many were killed this past year without a hunting season. It's pretty sickening, and that doesn't include, the shoot, shovel and shut up bear deaths either. Economically, the live, protected grizzly bears bring in many more dollars,(tourists,) than the grizzly hunting season will ever bring. The current population of Grizzlies is not recovered by any means. Follow the science man! Why is this even being considered? Look what happened to the wolves a few years ago, doesn't that show you people anything? A bear or a wolf doesn't know where a National Park property line is. For Pete sakes people wake up!	Miscellaneous	National Parks belong to everyone, just as the grizzly bears belong to everyone within those parks, not to someone who pays to kill it. I want to be able to enjoy the bears. Ask someone how many were killed this past year without a hunting season. It's pretty sickening, and that doesn't include, the shoot, shovel and shut up bear deaths either. Economically, the live, protected grizzly bears bring in many more dollars,(tourists,) than the grizzly hunting season will ever bring. The current population of Grizzlies is not recovered by any means. Follow the science man! Why is this even being considered? Look what happened to the wolves a few years ago, doesn't that show you people anything? A bear or a wolf doesn't know where a National Park property line is. For Pete sakes people wake up!	FWS-R6-ES-2016-0042-3617	
I am opposed to the delisting of the Yellowstone grizzlies. If you have no regard for these creatures, at least consider our Native American tribes who revere the grizzlies. This country owes a lot to our Native tribes. Please show them some respect by not offending their culture. There is also the matter of lost tourism in Yellowstone. If there are less bears, there will be less tourism and less income for the Park. I sincerely hope that you do not remove the ecosystem of grizzly bears in Yellowstone from the Federal List of Endangered and Threatened Wildlife.	Miscellaneous	I live on the East Coast and have never seen a grizzly bear in person. This fact does not lessen my concern for them. I am opposed to the delisting of the Yellowstone grizzlies. If you have no regard for these creatures, at least consider our Native American tribes who revere the grizzlies. This country owes a lot to our Native tribes. Please show them some respect by not offending their culture. There is also the matter of lost tourism in Yellowstone. If there are less bears, there will be less tourism and less income for the Park. I sincerely hope that you do not remove the ecosystem of grizzly bears in Yellowstone from the Federal List of Endangered and Threatened Wildlife.	FWS-R6-ES-2016-0042-3675	
While an understanding of the scientific justification* against de-listing of the grizzlies in Yellowstone should be enough, there is a possibly even greater argument for ensuring security for the grizzly: The continued existence of one of the world's most magnificent top predators that have roamed most of North America for eons, respected by Native Americans, feared by early explorers like Lewis and Clark, and held in awe by most of us. Is it too much to ask of us as Americans and also stewards of the land we have so grossly denigrated, to want to maintain a tiny corner of the country for one of the greatest symbols of wildness left on this earth?	Miscellaneous	While an understanding of the scientific justification* against de-listing of the grizzlies in Yellowstone should be enough, there is a possibly even greater argument for ensuring security for the grizzly: The continued existence of one of the world's most magnificent top predators that have roamed most of North America for eons, respected by Native Americans, feared by early explorers like Lewis and Clark, and held in awe by most of us. Is it too much to ask of us as Americans and also stewards of the land we have so grossly denigrated, to want to maintain a tiny corner of the country for one of the greatest symbols of wildness left on this earth? Our care and ability to secure a safe future existence for this grand, beautiful mammal, despite all odds against it, will leave a legacy that will speak volumes to future generations of Americans about who we were. * low population diversity, a less than suitable bear habitat in GYE, continued habitat degradation and human encroachment, all the effects of climate change, reduced and in some cases the lack of preferred bear food sources (white bark pine nuts, cut throat trout) in GYE, the ecological importance of an apex predator in maintaining the health of the GYE ecosystems, and the spontaneous culling by "threatened" humans.	FWS-R6-ES-2016-0042-3725	
My friends have visited your lovely park, and I had plans in the future to make this one of my destinations as they want to go back. I will not visit. Not only will I not visit, but I will tell anyone I know not to visit, not to support and not to participate. Without the draw card of me visiting Yellowstone I have no other reason to travel to your country in which case I will never visit and you will not get my money.	Miscellaneous	Only a few days ago I heard about the Proposed Rule to remove the Grizzly Bears within the Greater Yellowstone Ecosystem off the Federal List of Endangered and Threatened Wildlife list. This is to be done by the Fish and Wildlife Service. Many reasons for this have been explored in information offered, but this is where I think things become simple. You are either for the bears or against. In the research and explanations offered I am reading a text that is not only against these bears, but has been created in a way that I think appears biased in removing them from the list and I cannot fathom why this would be the case when it should be unbiased and simply based on facts gathered from multiple sources and from people with education in multiple disciplines. I am for the bears. I have an understanding that you believe their ecosystem will/has become incapable of supporting the current population, and that in the future the ecosystem will not be able to support them. I cannot fathom how studies into how to support their ecosystem have not been considered. You could not feign no knowledge of these issues when the bears have been so closely monitored over so many years. Where are the cutthroat trout, what can be done to ensure growth in this area, instead of the constant decline in numbers. Are the bears incapable of eating Lake trout and if this is the case why were they introduced to the ecosystem? What of the Whitebark pine seeds. If fires and beetles have seen a sharp decline in available food from these trees, what has been done since 1988 to replace what was lost. See, if you were for the bears all of these missing links in their ecosystem would have been on the to do list, would have been taken care of, so who dropped the ball? Is shooting Grizzlies in Yellowstone the answer, I don't think so. If your bears in your park are going to starve to death then look at how to fix it, not kill the bears so as to try to fool people. Where is the transparency in releasing data collected by your government. The IGBST is not releasing this, and that makes this situation look a lot more deplorable than it POSSIBLY is. Without evidence being able to be scrutinized by people outside of government and people with nil vested interests having a say in this decision how do we know that this decision is correct and honorable. Public Relations. My friends have visited your lovely park, and I had plans in the future to make this one of my destinations as they want to go back. I will not visit. Not only will I not visit, but I will tell anyone I know not to visit, not to support and not to participate. Without the draw card of me visiting Yellowstone I have no other reason to travel to your country in which case I will never visit and you will not get my money. Please take that seriously. I had always wanted to see Canada, but their recent decision to kill Polar Bears has now made me declare that I won't, and I am spreading the word rapidly about what they have done. Wait and see what a disaster it will be for them if you really need proof. I cannot conceive that a country that can send people into deep space, build war machines that only the strongest of imaginations could have dreamed up, and a country that is one of the strongest in the developed world, cannot sort out a little ecosystem vs grizzly bears issue. How has it come to killing? There has been some argument about genetics, well what about the genetics of removing bears, a dying genetic pool along with dying bears. What of the stress that will be inflicted on these great animals as population declines. As bears die they will know and there will be a backlash of stress, population decline, illness and sickness that goes with all vile acts perpetrated against a species. Then we will be left with no bears in Yellowstone. Imagine having to explain that one. Will the bears live and thrive? I suppose it all comes down to if you want them too, and frankly I'm not seeing that this is your intention.	FWS-R6-ES-2016-0042-3745	
It is with a hopeful heart that you will read this letter from the first line to the last, and try to understand how important it is that our Grizzly bears are not de-listed. That the ESA stay in tact, and that individual states should not have control over our wildlife and public lands. This land belongs to you and I, and it is a gift to "ALL" American citizens! Not just hunters and cattleman who have their lobbyists.	Miscellaneous	It is with a hopeful heart that you will read this letter from the first line to the last, and try to understand how important it is that our Grizzly bears are not de-listed. That the ESA stay in tact, and that individual states should not have control over our wildlife and public lands. This land belongs to you and I, and it is a gift to "ALL" American citizens! Not just hunters and cattleman who have their lobbyists. These bears are the true meaning of our wild America. They are true icons, ambassadors of the west, and they bring millions of visitors, and millions of visitor dollars to the economy of our western states. Just how do you count Grizzly bears? I don't think you can get an accurate count! Their food is vanishing, with the loss of Cutthroat trout and loss of the Whitebark pines. The loss of these bears by hunters, claiming an encounter. Extinction happens much faster than recovery. So please, think very carefully before you sign on the dotted line. I'd vote NO to delisting Grizzly's. I want my family for generations to come, to be able to visit our beautiful western states, and be able to see a wild Grizzly bear. "My Story" My husband had promised to take me on vacation to Yellowstone National Park for 30 years. A place I always wanted to visit, because of my love for wildlife and photography. Well, he made good on his promise, for my 60th birthday 8 years ago. My goal was to see a "Wild" grizzly bear. We had 10 days to accomplish this and rose every morning at 5am, to be out early. I was so full of excitement and anticipation. But, as the days slipped by (now on day 5) with not a single sighting, I asked if we could spend a couple of days in the Tetons. So off we headed. It took 2 more days, and then it happened! On day eight, our last day in the Tetons I saw my first grizzly bear. Not just any grizzly, but Grizzly # 399! As everybody learns quit quickly, when you see a car pulled over on the side of the road, it usually means something special has been spotted. We asked what this couple in the car saw, as we couldn't see anything in the tall grass. Then she appeared. What a majestic animal! We watched her (she was totally ignoring the huge crowd that had gathered) for an hour digging up grubs and stopping to sniff the cool fall air. It was an amazing glimpse into her wild world. I have been back to Greater Yellowstone two more times. Scrimped and saved every penny I could! The second trip, I did not get to see any bears. My last trip cost \$14,000.00. for only 9 days. Just to see Grizzly bears. Only one day out of that 9, was I lucky enough, with the help of a guide, to see another Grizzly. You aren't guaranteed a sighting. So, if I'm not seeing bears, I think, there really aren't as many as you think out there. Don't you want your families to see Grizzly bears for generations to come? Not just a trophy on somebody's wall or floor. Remember: EXTINCTION IS FOREVER Patricia Greig	FWS-R6-ES-2016-0042-3585	

Don't you want your families to see Grizzly bears for generations to come? Not just a trophy on somebody's wall or floor.	Miscellaneous	It is with a hopeful heart that you will read this letter from the first line to the last, and try to understand how important it is that our Grizzly bears are not de-listed. That the ESA stay in tact, and that individual states should not have control over our wildlife and public lands. This land belongs to you and I, and it is a gift to "ALL" American citizens! Not just hunters and cattleman who have their lobbyists. These bears are the true meaning of our wild America. They are true icons, ambassadors of the west, and they bring millions of visitors, and millions of visitor dollars to the economy of our western states. Just how do you count Grizzly bears? I don't think you can get an accurate count! Their food is vanishing, with the loss of Cutthroat trout and loss of the Whitebark pines. The loss of these bears by hunters, claiming an encounter. Extinction happens much faster than recovery. So please, think very carefully before you sign on the dotted line. I'd vote NO to delisting Grizzly's. I want my family for generations to come, to be able to visit our beautiful western states, and be able to see a wild Grizzly bears. "My Story" My husband had promised to take me on vacation to Yellowstone National Park for 30 years. A place I always wanted to visit, because of my love for wildlife and photography. Well, he made good on his promise, for my 60th birthday 8 years ago. My goal was to see a "Wild" grizzly bear. We had 10 days to accomplish this and rose every morning at 5am, to be out early. I was so full of excitement and anticipation. But, as the days slipped by (now on day 5) with not a single sighting, I asked if we could spend a couple of days in the Tetons. So off we headed. It took 2 more days, and then it happened! On day eight, our last day in the Tetons I saw my first grizzly bear. Not just any grizzly, but Grizzly # 399! As everybody learns quit quickly, when you see a car pulled over on the side of the road, it usually means something special has been spotted. We asked what this couple in the car saw, as we couldn't see anything in the tall grass. Then she appeared. What a majestic animal! We watched her (she was totally ignoring the huge crowd that had gathered) for an hour digging up grubs and stopping to sniff the cool fall air. It was an amazing glimpse into her wild world. I have been back to Greater Yellowstone two more times. Scrimped and saved every penny I could! The second trip, I did not get to see any bears. My last trip cost \$14,000.00. for only 9 days. Just to see Grizzly bears. Only one day out of that 9, was I lucky enough, with the help of a guide, to see another Grizzly. You aren't guaranteed a sighting. So, if I'm not seeing bears, I think, there really aren't as many as you think out there. Don't you want your families to see Grizzly bears for generations to come? Not just a trophy on somebody's wall or floor. Remember: EXTINCTION IS FOREVER Patrica Greig	FWS-R6-ES-2016-0042-3585	
A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it.	Miscellaneous	I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters. Yellowstone was almost destroyed with this insane and uneducated war on wolves and now (do we learn nothing??) the same is happening with the Grizzly Bears. It is mind boggling. Please consider that: Everything in your power should be done to protect this amazing mammal. FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Declining food sources pose a threat to Grizzlies and this delisting will be devastating to the Grizzly's chance of survival.. Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Another natural curb in their number. Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains Grizzlies occupy only 1% of their historic range. AND PLEASE TAKE NOTE: Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years, caused by ignorant planning by humans, by the way.. Hoping for some forward thinking and moral courage here! Thank you Anne K	FWS-R6-ES-2016-0042-3905	
Wyoming, Montana, Idaho will suffer financially by delisting grizzly bears. While Fish and Game may get tag money, there will be millions of people who will shun those states of tourist dollars. I live in black bear country in the Sierra Nevada but will drive hundreds of miles to go to grizzly country, but if those states are willing to deprive the rest of the citizens for 'trophy' hunting, a disgusting word on the face of it, I for one won't be back! What a sell out by our government officials not to maintain our big animals for ALL OF AMERICA not just for a few. Disgusting!! have made a number of trips to Wyoming and Montana, mostly for photography over the years. I was there this last fall. Trying to even find a bear black or grizzly proved more difficult than just sitting on my couch looking out my window of my home in the mountains.	Miscellaneous	Wyoming, Montana, Idaho will suffer financially by delisting grizzly bears. While Fish and Game may get tag money, there will be millions of people who will shun those states of tourist dollars. I live in black bear country in the Sierra Nevada but will drive hundreds of miles to go to grizzly country, but if those states are willing to deprive the rest of the citizens for 'trophy' hunting, a disgusting word on the face of it, I for one won't be back! What a sell out by our government officials not to maintain our big animals for ALL OF AMERICA not just for a few. Disgusting! I have made a number of trips to Wyoming and Montana, mostly for photography over the years. I was there this last fall. Trying to even find a bear black or grizzly proved more difficult than just sitting on my couch looking out my window of my home in the mountains. If that means 'there are too many bears' than I suggest a recount. How large animals in a balanced ecosystem can be reduced from 100,000 in historic times, to 600-700 bears and that is considered too many..... seems like the money is doing the talking. I concur with Jane Goodall et. al. and their position. Attachments GB-ScientistFinal5-5-16	FWS-R6-ES-2016-0042-3923	
Removing them from the Endangered and Threatened Wildlife list puts not only their species, but other species at risk due to decreased hunting regulations. Please keep this important species on the Endangered and Threatened Wildlife list: By doing so, you help maintain ecosystem balance for subsequent generations to enjoy.	Miscellaneous	Grizzly bears are a keystone species, and their populations are an important part of the ecosystem of Yellowstone. Removing them from the Endangered and Threatened Wildlife list puts not only their species, but other species at risk due to decreased hunting regulations. Please keep this important species on the Endangered and Threatened Wildlife list: By doing so, you help maintain ecosystem balance for subsequent generations to enjoy.	FWS-R6-ES-2016-0042-3962	

State Fish and Wildlife Departments do not have a good record of acting independently of the gun and ammunition manufacturers. All are materially funded by the 11% federal tax on firearms and ammunition,2 distributed to the states based on the number of hunting permits each has issued.State fish and wildlife departments therefore have a vested interest in preserving the profits of gun and ammunition manufacturers. The de-listing proposal reflects this interest, rather than the interest of preserving healthy bear populations.Firearm manufacturers boast of the 1000% profit-enhancing benefits of this 11% federal excise tax on firearms and ammunition.	Miscellaneous	Please do not subject grizzly bears to further persecution of their species by de-listing them and allowing three states containing only 1.24%1 of our nation's populations and all the Yellowstone ecosystem grizzlies to trophy-hunt our national treasures. State Fish and Wildlife Departments do not have a good record of acting independently of the gun and ammunition manufacturers. All are materially funded by the 11% federal tax on firearms and ammunition,2 distributed to the states based on the number of hunting permits each has issued. State fish and wildlife departments therefore have a vested interest in preserving the profits of gun and ammunition manufacturers. The de-listing proposal reflects this interest, rather than the interest of preserving healthy bear populations. Firearm manufacturers boast of the 1000% profit-enhancing benefits of this 11% federal excise tax on firearms and ammunition.3 To earn their share of the tax, Fish and Wildlife Departments across the nation focus their attention on nurturing and managing primarily those species which hunters consider "game" or "prey." In order to be considered game or prey, a species must reproduce rapidly enough to sustain its numbers. Grizzly bears such low reproductive rates and such high mortality rates from human interactions, that they should not be considered a game/prey species. Without the intersecting protections provided by the National Park System and the Endangered Species Act, the Yellowstone ecosystem (and the Western part of the lower 48 states) might have no grizzlies at all, due to earlier Federal and state sanctioned predator extirpation programs on behalf of domestic sheep and cattle raising and settlement. As the grizzly bear population of the Yellowstone region is of necessity foraging outside the protected area of the park, many local organizations in the area have focused on helping the affected human communities to co-exist with these bears without incident. Such efforts include providing free bear- proof trash containers, assistance with the cost and proper installation of electric fencing, and education about grizzly bear behavior, and protecting the lands most likely to be used by grizzly bears to travel and forage safely around human developments, across roads, etc. The western state residents going to such lengths to enable co- existence clearly prefer that the bears continue to be protected as we all transition from fearing them to understanding and admiring them, including their ability to live among us if we will let them. Read about Grizzly Bear #399 by Tom Mangelsen and Todd Wilkinson to see how they do it. Do not let the nation's grizzlies become the rug or wall hanging of an individual trophy hunter. References: 1 Wyoming, Montana and Idaho about Yellowstone National Park. Approximately 96% of Yellowstone lies in Wyoming. According to the List of U.S. States and territories by population compiled for Wikipedia from the 2010 United States Census, Idaho contains 0.51% of the U.S. population, Montana 0.32% and Wyoming 0.18 percent. Although Alaska is not discussed here, its population was only 0.23% of the national total, and its grizzly bear populations are not (yet) considered threatened and are trophy hunted just outside protected national parks such as Denali. 2 Pittman Robertson Federal Aid in Wildlife Restoration Act of 1937 3 "Financial Returns to Industry from the Federal Aid in Wildlife Restoration Program" (Feb 15 2011) by Andrew Loftus Consulting, 3116 Munz Drive, Suite A, Annapolis, MD 21403 Tel: (410)-295-5997 and Southwick Associates, Inc., PO Box 6435, Fernandina Beach, FL 32035 Tel: 904-277-9765	FWS-R6-ES-2016-0042-3956	
Grizzly bears such low reproductive rates and such highmortality rates from human interactions, that they should not be considered a game/prey species. Without the intersecting protections provided by the National Park System and the Endangered Species Act, the Yellowstone ecosystem (and the Western part of the lower 48 states) might have no grizzlies at all, due to earlier Federal and state sanctioned predator extirpation programs on behalf of domestic sheep and cattle raising and settlement.	Miscellaneous	Please do not subject grizzly bears to further persecution of their species by de-listing them and allowing three states containing only 1.24%1 of our nation's populations and all the Yellowstone ecosystem grizzlies to trophy-hunt our national treasures. State Fish and Wildlife Departments do not have a good record of acting independently of the gun and ammunition manufacturers. All are materially funded by the 11% federal tax on firearms and ammunition,2 distributed to the states based on the number of hunting permits each has issued. State fish and wildlife departments therefore have a vested interest in preserving the profits of gun and ammunition manufacturers. The de-listing proposal reflects this interest, rather than the interest of preserving healthy bear populations. Firearm manufacturers boast of the 1000% profit-enhancing benefits of this 11% federal excise tax on firearms and ammunition.3 To earn their share of the tax, Fish and Wildlife Departments across the nation focus their attention on nurturing and managing primarily those species which hunters consider "game" or "prey." In order to be considered game or prey, a species must reproduce rapidly enough to sustain its numbers. Grizzly bears such low reproductive rates and such high mortality rates from human interactions, that they should not be considered a game/prey species. Without the intersecting protections provided by the National Park System and the Endangered Species Act, the Yellowstone ecosystem (and the Western part of the lower 48 states) might have no grizzlies at all, due to earlier Federal and state sanctioned predator extirpation programs on behalf of domestic sheep and cattle raising and settlement. As the grizzly bear population of the Yellowstone region is of necessity foraging outside the protected area of the park, many local organizations in the area have focused on helping the affected human communities to co-exist with these bears without incident. Such efforts include providing free bear- proof trash containers, assistance with the cost and proper installation of electric fencing, and education about grizzly bear behavior, and protecting the lands most likely to be used by grizzly bears to travel and forage safely around human developments, across roads, etc. The western state residents going to such lengths to enable co- existence clearly prefer that the bears continue to be protected as we all transition from fearing them to understanding and admiring them, including their ability to live among us if we will let them. Read about Grizzly Bear #399 by Tom Mangelsen and Todd Wilkinson to see how they do it. Do not let the nation's grizzlies become the rug or wall hanging of an individual trophy hunter. References: 1 Wyoming, Montana and Idaho about Yellowstone National Park. Approximately 96% of Yellowstone lies in Wyoming. According to the List of U.S. States and territories by population compiled for Wikipedia from the 2010 United States Census, Idaho contains 0.51% of the U.S. population, Montana 0.32% and Wyoming 0.18 percent. Although Alaska is not discussed here, its population was only 0.23% of the national total, and its grizzly bear populations are not (yet) considered threatened and are trophy hunted just outside protected national parks such as Denali. 2 Pittman Robertson Federal Aid in Wildlife Restoration Act of 1937 3 "Financial Returns to Industry from the Federal Aid in Wildlife Restoration Program" (Feb 15 2011) by Andrew Loftus Consulting, 3116 Munz Drive, Suite A, Annapolis, MD 21403 Tel: (410)-295-5997 and Southwick Associates, Inc., PO Box 6435, Fernandina Beach, FL 32035 Tel: 904-277-9765	FWS-R6-ES-2016-0042-3956	

Another reason the grizzly should not be delisted is the fact that wildlife watchers pay millions of dollars each year to come to Yellowstone to see wolves and bears. I am a part of that statistic. Yellowstone National Park was our first established park and it is a national heritage. I, as a wildlife watcher, have just as much right to see grizzlies in the wild running free and safe as do trophy hunters have to kill them. Only difference is my activity doesn't take away from others. It is a rare treat to see a grizzly in the park while they are protected. I can only imagine the decline in sightings once they are delisted. If grizzlies can't be seen many tourist will find no reason to visit Yellowstone anymore. Tourist dollars will decline. All our favorite bears that we have followed for years and years will be targeted.	Miscellaneous	I am writing to voice my OPPOSITION to the delisting of the GYE Grizzly Bear. I have many reasons which include the following: FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted, but they barely survive in 4% of their historic range in the lower 48 states. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups like WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. Also, even with protections, 59 grizzlies were killed in 2015. Another reason the grizzly should not be delisted is the fact that wildlife watchers pay millions of dollars each year to come to Yellowstone to see wolves and bears. I am a part of that statistic. Yellowstone National Park was our first established park and it is a national heritage. I, as a wildlife watcher, have just as much right to see grizzlies in the wild running free and safe as do trophy hunters have to kill them. Only difference is my activity doesn't take away from others. It is a rare treat to see a grizzly in the park while they are protected. I can only imagine the decline in sightings once they are delisted. If grizzlies can't be seen many tourist will find no reason to visit Yellowstone anymore. Tourist dollars will decline. All our favorite bears that we have followed for years and years will be targeted. #399, a 20 year old sow is already lined up in several hunter's scopes. Is it because she would be a great trophy on a wall? NO!! In fact she is targeted because she is loved by thousands of adoring watchers that have watched her raise cubs over the years. They want to kill her just to hurt her admirers. One important thing I want to point out is that there is this misconception that some seem to think that if there is a hunting season for grizzlies then there will be more tolerance towards them. That is so far from the truth. They said that about the wolves, as well, and look at the mass hatred that builds stronger and stronger each season. Each year more and more intolerance builds and the lust for blood increases. As the old saying goes if you give a little then they want more and more and more. Why recover a species just to hunt them back to critical levels again? Climbing back up from a decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. Even then infant mortality is greater than 50%. Also you can't trust Montana, Idaho, Wyoming to be fair in protecting and maintaining the grizzly populations. They proved that when they were given control over the wolf populations. They only cater to the trophy hunters and ungulate hunters. As a matter fact, Wyoming failed so miserably that the Federal government had to take control back from them with regards to the wolves. Their track record is clearly unhealthy for the wildlife management.	FWS-R6-ES-2016-0042-4218	
A recent national poll on behalf of the HSUS and Wyoming Wildlife Advocates shows the following: A 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. A More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. A 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium . A A	Miscellaneous	No one really knows how many grizzlies are in the GYE. The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foods, are a threat to the grizzly's long term survival. The bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine which is a critically important food source." Climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. The approach of letting states manage the bears is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. A recent national poll on behalf of the HSUS and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy	FWS-R6-ES-2016-0042-4226	
TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states KNOWN for their hatred of and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and MOST Americans (55%) OPPOSE de-listing. Even more Americans (68%) OPPOSE the hunting of grizzly bears.	Miscellaneous	Please do NOT remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife! 1) The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. 2) Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. 3) Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations in particular and with humans in general can be expected as grizzlies are forced to range ever farther looking for food sources to replace those lost in recent years. 4) GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, they are particularly vulnerable to excessive killing by humans. Last year 59 grizzlies were killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow-reproducing species. 5) TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states KNOWN for their hatred of and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and MOST Americans (55%) OPPOSE de-listing. Even more Americans (68%) OPPOSE the hunting of grizzly bears. Thank you, HJ	FWS-R6-ES-2016-0042-4240	Tax payers / taxes funded recovery

Americans would never accept hunting of America's bald eagle; hunting Yellowstone grizzly bears is equally unacceptable.	Miscellaneous	I OPPOSE DESISTING OF GRIZZLY BEARS! This is the most ridiculous idea ever! I travel to Yellowstone multiple times per year so I can get a glimpse of them in either Yellowstone or Grand Teton. Idaho, Wyoming and Montana are pro-hunting states and won't delay issuing hunting licenses immediately! These creatures would go from full protection to being hunted. They are used to human populations and is equivalent to shooting fish in the proverbial barrel. Americans would never accept hunting of America's bald eagle; hunting Yellowstone grizzly bears is equally unacceptable. To make matters worse, America's great bears face the same looming threats as many species across the country due to climate change. In the last decade, climate change has decimated the Yellowstone grizzly's most important food, the white bark pine nut. Unfortunately, the March 3, 2016, delisting announcement by the U.S. Fish and Wildlife Service (FWS) came paired with an astonishing declaration in the Federal Register: "Therefore, we conclude that the effects of climate change do not constitute a threat to the [Yellowstone grizzly bear population] now, nor are they anticipated to in the future." This statement is even more disturbing in light of your administration's commitment to addressing climate change, because climate change predictions are dire for all our planet's species. How can it be that the military considers climate change in all its decisions, while the agency responsible for our wildlife, the FWS, does not? The same argument - the denial of climate change - was used by the FWS in 2014 to deny listing the wolverine in the lower 48 states. On April 4, 2016, that decision was reversed in federal court, and declared "arbitrary and capricious." The FWS was ordered to reconsider its reasoning about climate change. It's now time for this federal agency to play catch up and use "the best available science" to keep grizzly bears on the ESA list. A critical question: Who benefits from delisting Yellowstone's grizzly bears? The only certain outcome of delisting bears will be trophy hunts in Idaho, Montana and Wyoming. We ask you to instruct our federal wildlife managers to withdraw the March 3 rule and order the FWS to take another look at how climate change impacts grizzly bears. Any decision about the bear's future should be put on hold until independent scientific review can explore potential impacts to bears from climate change. We strongly suspect that America's great bears face a dire future, even with the continued protection of the Endangered Species Act.	FWS-R6-ES-2016-0042-4264	comparison to the bald eagle
A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows that 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. 50 percent of hunters nationwide oppose delisting of grizzlies and 62 percent of hunters support a five-year moratorium on delisting. Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal.	Miscellaneous	I am asking you to NOT delist grizzly bears in the Greater Yellowstone Ecosystem. The USFWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. However, David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. In reality, no one really knows how many grizzlies are in the GYE. Furthermore, population growth has stagnated since the early 2000's, and the Yellowstone grizzly population declined by 59 bears in 2015 alone. The USFWS also claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide. Therefore, the grizzly bear cannot be delisted in just the GYE. By USFWS own estimates, around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Furthermore, Yellowstone's Grizzly population has no connectivity with outside populations, and has not for the last 100 years. This means that today's population came from a gene pool of only 136 animals (the population low point in 1975. This lack of genetic diversity threatens the Yellowstone grizzly's survival in the long term. USFWS claims that the shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foods is not a threat to the grizzly's long term survival. Whitebark pine nuts have long been considered to be the single most important food source for grizzlies. In the last 20 years, whitebark pines have been decimated by both blister rust and pine beetles. The pine beetle epidemic has been linked to climate change. According to Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council, "Yellowstone grizzly bears are likely declining in the wake of the loss of whitebark pine, a critically important food source." USFWS claims that Montana, Idaho, and Wyoming will successfully use hunting to manage the recovered grizzly bear population. If GYE grizzly bears are delisted, the three states have already signaled that they will open up trophy hunting seasons for the bears. Wyoming holds the vast majority of grizzlies. I do not believe that Wyoming can be considered capable of maintaining populations of any large carnivore in a scientific manner, considering its dismal record of "managing" wolf populations. Its wolf management is so bad that it has had to be struck down in federal court twice. Only now that the wolf has been relisted in Wyoming are we finally seeing wolves again in Grand Teton National Park, which will prove to increase visitation to that park and consequently tourist revenue. Montana has released its management plan and is proposing a spring hunting season to run between March 15 and April 20. Yet we have already seen grizzly sows with cubs in Yellowstone National Park as early as April 16th. With warming temperatures in the future, emergence could occur even earlier than that. This means grizzly sows with new cubs could be killed and these tiny helpless bears left motherless. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. The USFWS agency says it looks forward to hearing from the public about delisting. A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows that 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. 50 percent of hunters nationwide oppose delisting of grizzlies and 62 percent of hunters support a five-year moratorium on delisting. Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. For all of these reasons I request that the USFWS	FWS-R6-ES-2016-0042-4260	
DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? Å	Miscellaneous	#NAME?	FWS-R6-ES-2016-0042-4274	
NEARLY 50 TRIBES OPPOSE DELISTING OF GRIZZLIES. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly oppose delisting and hunting of these bears, which they consider to be sacred animals.	Miscellaneous	#NAME?	FWS-R6-ES-2016-0042-4274	

YET THE REALITY IS: A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: A 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. A More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. A 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium.	Miscellaneous	I would like to enter the following comments about the proposed delisting of the Yellowstone Grizzly: YOUR CLAIM IS THAT there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. YET IN REALITY: no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." YOUR CLAIM IS THAT the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. YET THE REALITY IS: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. YOUR CLAIM IS THAT your agency will stay involved with protecting the grizzly population after delisting. YET THE REALITY IS: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. YOUR CLAIM IS THAT: Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. YET THE REALITY IS THAT:This approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. ===== SPECIAL OBJECTIONS!!!! ===== YOUR CLAIM IS THAT: your agency looks forward to hearing from the public about delisting. YET THE REALITY IS: A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. YOU CLAIM THAT your agency claims to look forward to consulting with Native American tribes about the delisting. AND YET IN REALITY: Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and fish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate. lie and cheat their way into control." Tom Poor Bear concludes: "I warn	FWS-R6-ES-2016-0042-4382	
I write to express my opposition to delisting of Yellowstone grizzly bears, and support of the efforts of Tribes to preserve the iconic and sacred Great Bear.	Miscellaneous	I write to express my opposition to delisting of Yellowstone grizzly bears, and support of the efforts of Tribes to preserve the iconic and sacred Great Bear. State and federal agencies have not addressed the mounting threats of human development, climate change, invasive species, and the subsequent loss or diminishment of key foods, including whitebark pine seeds, cutthroat trout, and elk. As bears seek out yet more meat to compensate for the collapse of these foods, they are being killed at unsustainably high rates that threaten their survival. I am concerned that delisting would give full management authority to the states of Idaho, Wyoming and Montana, which are notoriously hostile to large carnivores. State management guarantees a grizzly bear sport hunt, which is not justified in light of current excessive mortality rates. Further, if grizzly bears are delisted, the states plan to eliminate them in habitat that is critical to their long-term recovery.Despite significant reductions in the availability of human foods and attractants to grizzly bears, humans are still the number one cause of bear mortality. Instead of delisting, a move that would dry up funds and lower agency commitment to coexistence programs, the Department of Interior should redouble efforts to reduce human-bear conflicts. Delisting is also premature due to the long-term isolation of Yellowstone's grizzly bears. Relying on trucking in bears to deal with the problem of genetic isolation is risky and unwise, especially when it is still possible to naturally reconnect Yellowstone and Northern Continental Divide grizzly bear populations. Restoration of grizzly bears in the vast Selway Bitterroot recovery area would also boost connectivity between Northern Rockies ecosystems. Delisting and sport hunting would undermine prospects for connectivity and permanently isolate Yellowstone's grizzly bears. I support the efforts of a growing coalition of Tribes that is dedicated to protecting Yellowstone's bears and preventing delisting. I ask that you initiate formal consultation with all involved tribes, and promptly correct the disrespectful and dismissive behavior of your staff towards Indian people involved with the grizzly bear issue. The sovereignty of Tribes must be recognized and respected Recovery of the Yellowstone grizzly bear population is achievable, but not if the hard-fought gains of the last 40 years are reversed by delisting. Please do not risk the future of Yellowstone's iconic grizzly bears. Thank you for your consideration	FWS-R6-ES-2016-0042-4399	
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A Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber x operations." A	Miscellaneous	I would like to enter the following comments about the proposed delisting of the Yellowstone Grizzly: YOUR CLAIM IS THAT there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. YET IN REALITY: no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." 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I support the efforts of a growing coalition of Tribes that is dedicated to protecting Yellowstone's bears and preventing delisting. I ask that you initiate formal consultation with all involved tribes, and promptly correct the disrespectful and dismissive behavior of your staff towards Indian people involved with the grizzly bear issue. The sovereignty of Tribes must be recognized and respected	Miscellaneous	I write to express my opposition to delisting of Yellowstone grizzly bears, and support of the efforts of Tribes to preserve the iconic and sacred Great Bear. State and federal agencies have not addressed the mounting threats of human development, climate change, invasive species, and the subsequent loss or diminishment of key foods, including whitebark pine seeds, cutthroat trout, and elk. As bears seek out yet more meat to compensate for the collapse of these foods, they are being killed at unsustainably high rates that threaten their survival. I am concerned that delisting would give full management authority to the states of Idaho, Wyoming and Montana, which are notoriously hostile to large carnivores. State management guarantees a grizzly bear sport hunt, which is not justified in light of current excessive mortality rates. Further, if grizzly bears are delisted, the states plan to eliminate them in habitat that is critical to their long-term recovery. Despite significant reductions in the availability of human foods and attractants to grizzly bears, humans are still the number one cause of bear mortality. Instead of delisting, a move that would dry up funds and lower agency commitment to coexistence programs, the Department of Interior should redouble efforts to reduce human-bear conflicts. Delisting is also premature due to the long-term isolation of Yellowstone's grizzly bears. Relying on trucking in bears to deal with the problem of genetic isolation is risky and unwise, especially when it is still possible to naturally reconnect Yellowstone and Northern Continental Divide grizzly bear populations. Restoration of grizzly bears in the vast Selway Bitterroot recovery area would also boost connectivity between Northern Rockies ecosystems. Delisting and sport hunting would undermine prospects for connectivity and permanently isolate Yellowstone's grizzly bears. I support the efforts of a growing coalition of Tribes that is dedicated to protecting Yellowstone's bears and preventing delisting. I ask that you initiate formal consultation with all involved tribes, and promptly correct the disrespectful and dismissive behavior of your staff towards Indian people involved with the grizzly bear issue. The sovereignty of Tribes must be recognized and respected Recovery of the Yellowstone grizzly bear population is achievable, but not if the hard-fought gains of the last 40 years are reversed by delisting. Please do not risk the future of Yellowstone's iconic grizzly bears. Thank you for your consideration	FWS-R6-ES-2016-0042-4399	
I am extremely concerned that the draft delisting rule and conservation strategy falls far short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to postpone the delisting of the Yellowstone grizzly bear population and to maintain federal protection for grizzly bears throughout the Greater Yellowstone Ecosystem. Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method. Theodore Roosevelt	Miscellaneous	See attached file(s) Attachments 160509_fws-r6-es-2016-0042-0001_keep_esa_protections_for_yellowstone_grizzlies	FWS-R6-ES-2016-0042-4459	
The power and push of the states to grant hunting rights to the wealth few to increase revenue is offset by themoney spent by others to see wild Grizzlies. I live in a state that had, or may have them and I feel the sorrow of their absence.	Miscellaneous	I am writing you to request that you not de-list the Grizzly Bear from the ESA. Climate change's effect on the food sources of the Yellowstone ecosystem are profound. They alone are reason enough never to de-list the Yellowstone Grizzly. The white bark pine nuts are a major Grizzly food source, and have all but disappeared from Yellowstone due to higher winter temperatures. The white bark pine is also found in high remote unoccupied areas where the female Grizzly can feed undisturbed. Army cutworm moths, another Grizzly food source found in high talus fields are being pushed north out of Yellowstone by rising temperatures, and pesticide spraying in the plains states. As the weather gets hotter and dryer it stresses the vegetation and grasses the base animals depend on, causing a decline in the food quality for Elk, Bison and rodents, all bear food source. Cutthroat Trout are also disappearing, after the appearance of Lake Trout in Yellowstone lake. The efforts to eradicate the Lake trout have been expensive and unsuccessful. Grizzly bear mortality by all causes (human and natural) is precarious at best. Sport(Trophy) hunting can easily push bear mortality past the brink of recovery. The Grizzly bear reproductive rate is extremely low making any recovery very slow.(Kind of like the white bark pine). Once Grizzly deaths exceed births you are headed towards extinction. De-listing would accelerate this and the proposed controls are to slow reacting to properly ward this off. The Grizzly bear population has leveled out in recent years and the cause of this leveling off should be identified by further research. The power and push of the states to grant hunting rights to the wealth few to increase revenue is offset by the money spent by others to see wild Grizzlies. I live in a state that had, or may have them and I feel the sorrow of their absence. Thank you for the chance to present a few random thoughts.	FWS-R6-ES-2016-0042-4505	
Also, even though the population is slowly growing, less than a thousand bears is not many animals. Also, the states of Wyoming, Idaho and Montana are not protecting their wild ruminant populations very well, and most are declining because of failure of the breeding age females to have viable young that survive to adulthood. A very high prevalence of newborns have developmental malformations/birth defects. Any state that allows over 50% of some wild animal populations to be born with birth defects without doing something to find and mitigate the cause can't be trusted to protect predators, especially grizzlies and wolves.	Miscellaneous	With less food sources for grizzlies, it is not a good idea to remove the Greater Yellowstone Ecosystem Population from the Federal List of Endangered and Threatened Wildlife. Also, even though the population is slowly growing, less than a thousand bears is not many animals. Also, the states of Wyoming, Idaho and Montana are not protecting their wild ruminant populations very well, and most are declining because of failure of the breeding age females to have viable young that survive to adulthood. A very high prevalence of newborns have developmental malformations/birth defects. Any state that allows over 50% of some wild animal populations to be born with birth defects without doing something to find and mitigate the cause can't be trusted to protect predators, especially grizzlies and wolves. They even claim the wolves and grizzlies kill so many ruminant young that it causes population declines in the wild ruminant populations rather than trying to do something about the real cause of the declining ruminant populations. This is being less than truthful. It is actually the birth defects that either kill the newborn ruminants outright or make them much more susceptible to being caught by predators that are causing the low recruitment rates. I have seen no mention of the birth defects and adverse health issues on the ruminant newborns in the discussions concerning delisting of the grizzly. Has the USFWS done anything to mitigate the birth defects? If there are fewer and fewer large grazing animals for the grizzlies to eat, as well as no white-bark pine nuts or trout, it will definitely adversely affect the grizzly population and its ability to grow. The state game departments have completely ignored studies concerning the birth defects on ruminants and have consistently ignored all reports of birth defects on birds, mammals and amphibians. The agriculture departments have ignored the birth defects and health issues on domestic livestock that kill thousands each year and again the wild predators often are blamed. Since so many animals, including wolves have similar birth defects, it is possible that grizzlies also do. You should make certain that the grizzly cubs are not being similarly affected before even considering delisting. Human newborns have the same or similar birth defects and these serious health issues are increasing each year, so there is no reason to just assume that grizzly cubs are not being affected. Grizzlies eat foliage, like ruminants and they eat fruit, tubulars and meat, just like humans. Have you addressed this issue at all before recommending delisting? I am adamantly opposed to delisting the grizzly anywhere until all issues that may affect the grizzly populations are addressed, especially the issue of high prevalences of developmental malformations on newborns. See the links to the studies below: 2002 study: <http://www.ncbi.nlm.nih.gov/pubmed/12602857> 2011 study: doi:10.2461/wbp.2011.7.13 2015 study: <http://dx.doi.org/10.4172/2375-446X.1000132> Thank you for your consideration of this comment.	FWS-R6-ES-2016-0042-4869	Birth Defects
The Greater Yellowstone grizzly bear is one of the United States' most iconic species. Held sacred by native communities for thousands of years in the west, the majestic grizzly has become a treasured symbol of our wild heritage. Visitors spend millions of dollars in the region every year a vital part of many local economies in the hopes of seeing a magnificent grizzly. The loss of the grizzly would be a loss for the entire region, and a disservice to the wildlife professionals, dedicated conservationists, and wildlife advocates who have fought to save them. In permitting the sacrifice of anything that would be of the slightest value to future visitors to the convenience, bad taste, playfulness, carelessness, or wanton destructiveness of present visitors, we probably yield in each case the interest of uncounted millions to the selfishness of a few individuals. Frederick Law Olmstead	Miscellaneous	See attached file(s) Attachments 160509_fws-r6-es-2016-0042-0001_keep_esa_protections_for_yellowstone_grizzlies	FWS-R6-ES-2016-0042-4459	

I also want to note the recent meta-analysis of the impact of hunting keystone predators upon their ability to best perform their vital ecological functioning, and that the environmental detriment is not simply a function of the number of animals left on the landscape, but also of the ways their behaviors are influenced by being subject to hunts (Ripple, et.al., Bioscience, 2009).	Miscellaneous	I am writing to respectfully share my opposition to the proposal to delist grizzlies in the Greater Yellowstone Ecosystem. I submit my comments as someone who takes an annual back country trip to another grizzly habitat, Glacier National Park in Montana, and who over the years has developed a deep appreciation for grizzlies. I also have a deep appreciation for the fact that, while generally calm, when feeling that they/their young may be threatened, they can pose a life threatening danger to hikers/backpackers or others. Given recent decreases in their food sources, and more bears wandering further in search of sustenance, I can anticipate that many of the bears in the Yellowstone system will wander at times outside of the park's boundaries. I have concern that any sport hunting which might be allowed by states after delisting (and which are already rumored to be in the works) would not only threaten the grizzly population, but could also increase the potential for conflict/threat between grizzlies and non-consumptive wildlife users, such as hikers/backpackers. If a bear were to survive or witness an encounter with a sport hunter, I worry that that bear would be more prone to perceive other humans as a threat, and therefore put people at greater risk as well. I am also concerned given how slowly grizzly bears reproduce, and the inexact science with regards to counting their population. Last year in Florida's first black bear hunt, quotas were exceeded over the first weekend of the hunt. If quotas for a grizzly hunt were accidentally exceeded, the time to rebuild the population could be significant. And from my observation with the limited sport hunting allowed of wolves, both here in my home state of Minnesota, and out west, once sport hunting starts, the appetite for it increases- regardless of if animal population numbers "support" continued hunts or not. If the FWS allows for the hunting of grizzlies, I think we need to be prepared for there to be more pressure for grizzlies to be hunted, whether or not the science would support that as a possible alternative at any given time. I also want to note the recent meta-analysis of the impact of hunting keystone predators upon their ability to best perform their vital ecological functioning, and that the environmental detriment is not simply a function of the number of animals left on the landscape, but also of the ways their behaviors are influenced by being subject to hunts (Ripple, et.al., Bioscience, 2009). In closing, I would like to add one additional matter. The USFWS says that it wants to work with Native American groups on this proposal. Over fifty native american groups have already shared that they are opposed to this delisting. Please listen to the voices of Native Americans, myriad scientists, and many many other Americans, and do not move forward with the delisting of grizzlies at this time. Thank you for your time and attention.	FWS-R6-ES-2016-0042-4930	
Not only would a Grizzly season be dangerous to the bears, but also to people. By actively seeking these animals in their homes, humans are more likely to be attacked by a bear that is protecting it's territory, it's cubs, or it's self. This is also a cause for concern in that these grizzlies may become extremely fearful of people. In situations where a human is just within site range, the bears will be easily agitated and far more likely to attack rather than to run away because of this increased fear. Which, in turn, will cause far more human injuries and deaths by Grizzly bears.	Miscellaneous	If by removing Grizzly Bears from the Endangered and Threatened Wildlife list entails a new founded hunting season or trophy hunt, I would hope you would reconsider. For numerous reasons, the hunt of these majestic creatures is not worth it's faults. Not having the ability to decipher the difference between a female and male bear should be a huge deterrence. Having the legal ability to kill either gender would cause a major lose in population. Cubs stay with their mother's for quite some time and by killing a female you might miss that she has cubs, whom will not survive without her, or that she may be pregnant. Not only would a Grizzly season be dangerous to the bears, but also to people. By actively seeking these animals in their homes, humans are more likely to be attacked by a bear that is protecting it's territory, it's cubs, or it's self. This is also a cause for concern in that these grizzlies may become extremely fearful of people. In situations where a human is just within site range, the bears will be easily agitated and far more likely to attack rather than to run away because of this increased fear. Which, in turn, will cause far more human injuries and deaths by Grizzly bears.	FWS-R6-ES-2016-0042-4920	
In closing, I would like to add one additional matter. The USFWS says that it wants to work with Native American groups on this proposal. Over fifty native american groups have already shared that they are opposed to this delisting. Please listen to the voices of Native Americans, myriad scientists, and many many other Americans, and do not move forward with the delisting of grizzlies at this time.	Miscellaneous	I am writing to respectfully share my opposition to the proposal to delist grizzlies in the Greater Yellowstone Ecosystem. I submit my comments as someone who takes an annual back country trip to another grizzly habitat, Glacier National Park in Montana, and who over the years has developed a deep appreciation for grizzlies. I also have a deep appreciation for the fact that, while generally calm, when feeling that they/their young may be threatened, they can pose a life threatening danger to hikers/backpackers or others. Given recent decreases in their food sources, and more bears wandering further in search of sustenance, I can anticipate that many of the bears in the Yellowstone system will wander at times outside of the park's boundaries. I have concern that any sport hunting which might be allowed by states after delisting (and which are already rumored to be in the works) would not only threaten the grizzly population, but could also increase the potential for conflict/threat between grizzlies and non-consumptive wildlife users, such as hikers/backpackers. If a bear were to survive or witness an encounter with a sport hunter, I worry that that bear would be more prone to perceive other humans as a threat, and therefore put people at greater risk as well. I am also concerned given how slowly grizzly bears reproduce, and the inexact science with regards to counting their population. Last year in Florida's first black bear hunt, quotas were exceeded over the first weekend of the hunt. If quotas for a grizzly hunt were accidentally exceeded, the time to rebuild the population could be significant. And from my observation with the limited sport hunting allowed of wolves, both here in my home state of Minnesota, and out west, once sport hunting starts, the appetite for it increases- regardless of if animal population numbers "support" continued hunts or not. If the FWS allows for the hunting of grizzlies, I think we need to be prepared for there to be more pressure for grizzlies to be hunted, whether or not the science would support that as a possible alternative at any given time. I also want to note the recent meta-analysis of the impact of hunting keystone predators upon their ability to best perform their vital ecological functioning, and that the environmental detriment is not simply a function of the number of animals left on the landscape, but also of the ways their behaviors are influenced by being subject to hunts (Ripple, et.al., Bioscience, 2009). In closing, I would like to add one additional matter. The USFWS says that it wants to work with Native American groups on this proposal. Over fifty native american groups have already shared that they are opposed to this delisting. Please listen to the voices of Native Americans, myriad scientists, and many many other Americans, and do not move forward with the delisting of grizzlies at this time. Thank you for your time and attention.	FWS-R6-ES-2016-0042-4930	
Grizzly bears are a critical piece of the Greater Yellowstone ecosystem and economy. They are also of significant cultural importance. Grizzlies keep ungulate and other wild herbivore populations healthy and appropriately limited and circulate nutrients into the soil.	Miscellaneous	Grizzly bears are a critical piece of the Greater Yellowstone ecosystem and economy. They are also of significant cultural importance. Grizzlies keep ungulate and other wild herbivore populations healthy and appropriately limited and circulate nutrients into the soil. They kill only a tiny portion of regional livestock and in any event ranchers are well-compensated for any losses by existing compensation funds. These bears are considered brothers to native populations and symbolize wilderness to tourists. A naturally regulated grizzly population helps drive tourism and the wider economy at Yellowstone, Grand Teton and the surrounding region. Their continued vigorous protection is well warranted.	FWS-R6-ES-2016-0042-5000	
These bears are considered brothers to native populations and symbolize wilderness to tourists. A naturally regulated grizzly population helps drive tourism and the wider economy at Yellowstone, Grand Teton and the surrounding region. Their continued vigorous protection is well warranted.	Miscellaneous	Grizzly bears are a critical piece of the Greater Yellowstone ecosystem and economy. They are also of significant cultural importance. Grizzlies keep ungulate and other wild herbivore populations healthy and appropriately limited and circulate nutrients into the soil. They kill only a tiny portion of regional livestock and in any event ranchers are well-compensated for any losses by existing compensation funds. These bears are considered brothers to native populations and symbolize wilderness to tourists. A naturally regulated grizzly population helps drive tourism and the wider economy at Yellowstone, Grand Teton and the surrounding region. Their continued vigorous protection is well warranted.	FWS-R6-ES-2016-0042-5000	
Without apex predators we cannot have a healthy eco-system. Not only are grizzly bears beautiful creatures but having a healthy population benefits all of us! When a grizzly bear eats a salmon- he leaves the bones and some tissue in the water or on land which fertilizes new growth. When the grizzly bear moves about the earth, he moves seeds from one area to the next and fertilizes with his scat along the way. Apex predators help control other animal populations and clean up the carcasses left behind. We have already lost too many species in an effort to dominate the earth and we need to take action to prevent further loss.	Miscellaneous	Please do not de-list Grizzly Bears. Without apex predators we cannot have a healthy eco-system. Not only are grizzly bears beautiful creatures but having a healthy population benefits all of us! When a grizzly bear eats a salmon- he leaves the bones and some tissue in the water or on land which fertilizes new growth. When the grizzly bear moves about the earth, he moves seeds from one area to the next and fertilizes with his scat along the way. Apex predators help control other animal populations and clean up the carcasses left behind. We have already lost too many species in an effort to dominate the earth and we need to take action to prevent further loss.	FWS-R6-ES-2016-0042-5538	

I do not feel any of the parties involved in preparing this ruling have done nearly enough to educate those living close to and with Grizzly Bears. Tolerance and acceptance is key to their survival. Grizzly Bears have a right to live on the same landscape as we do, and we the right to protect them from heading toward extinction, once again. And lastly, please acknowledge the many qualified scientists who completely disagree with the timing of this delisting ruling. I believe it to be a complete and utter travesty to read this ruling and see the contribution Dr. David Mattson has made to the IGBST and the entire Grizzly Bear recovery through his employment with them for so many years. He is not being given the platform needed to continue to share his invaluable expert analysis of the state of these Bears. Shameful. The IBCS should make available to Dr. Mattson and the scores of other scientists who are against this ruling, all raw data collected through the years. Thank You for your consideration to Not Delist Grizzly Bears at this time.	Miscellaneous	To: Sally Jewell, Secretary, U.S. Department of the Interior Daniel Ashe, Director, U.S. Fish and Wildlife Service From: Cindy Campbell, Grizzly Bear 760 Community, Wilson, Wyoming As a resident of Teton County, Wyoming, I had the privilege of attending the meeting of The Yellowstone Ecosystem Subcommittee of the Interagency Grizzly Bear Committee last November in Teton Village, Wyoming. During the two days of sessions I learned a great deal about the state of affairs of the Grizzly Bear population in my home, the Greater Yellowstone Ecosystem. I also heard a great deal of what I question is truly "best science available". This subjective term used to explain away certain "information", mostly about monitoring of these Grizzly Bears (who live in my backyard) left me feeling confused. I cannot understand certain rational which has been incorporated into this ruling. One area that astounds me is the Population Monitoring System. I do not know of any other arena, be it government budgets, wildlife management, business endeavors or a banking decision, where a 40% variance (F. van Manen, IGBST, November 4, 2016, Teton Village, Wyoming) in your baseline number is accepted as "best science available". This raises much concern. The original number IBCS has calculated will in fact be the foundation upon which the Great Grizzly Bear is managed for decades to come. We demand to know with 100% certainty that the accuracy of this baseline number is flawless. If IBCS does not have it exactly right from the beginning, it will have detrimental consequences for decades to come. A 40% variance is not acceptable in any situation, especially determining if and when Grizzly Bear are ready to be delisted. Next I fear the "opportunity" to hunt is driving the States plans (Wyoming, Idaho and Montana), rather than the "protecting and preserving of Grizzly Bears". I do not trust my own, or the other two, to properly manage an animal fresh of the Endangered Species List. It has been demonstrated again and again that the citizens of these three States, as well as the country at large, do not want to see Grizzly Bear managed down to the bottom line number. It terrifies me to think how quickly we could lose the foot hold the Bears barely have at this point in time. And then you add in the fact we really have no idea how many Bears there actually are. It would be completely in line with the "best science available" to not hunt Grizzly Bears. These Bears are a national treasure and it is beyond the pale to think that a Trophy Hunt is in their future. Most Americans will not tolerate seeing the much acclaimed "Recovered Grizzly Bear" population being trophy hunted. I do not feel any of the parties involved in preparing this ruling have done nearly enough to educate those living close to and with Grizzly Bears. Tolerance and acceptance is key to their survival. Grizzly Bears have a right to live on the same landscape as we do, and we the right to protect them from heading toward extinction, once again. And lastly, please acknowledge the many qualified scientists who completely disagree with the timing of this delisting ruling. I believe it to be a complete and utter travesty to read this ruling and see the contribution Dr. David Mattson has made to the IGBST and the entire Grizzly Bear recovery through his employment with them for so many years. He is not being given the platform needed to continue to share his invaluable expert analysis of the state of these Bears. Shameful. The IBCS should make available to Dr. Mattson and the scores of other scientists who are against this ruling, all raw data collected through the years. Thank You for your consideration to Not Delist Grizzly Bears at this time.	FWS-R6-ES-2016-0042-5494	
SERVICE HAS FAILED TO UPHOLD CONSULTATION OBLIGATION WITH TRIBES The grizzly bear holds significant cultural and spiritual importance to many Great Plains and Western tribes. More than fifty tribal nations and organizations have expressed strong opposition to the delisting of grizzly bears, yet the Service and the IGBST have ignored these voices and have failed to hold meaningful consultation with the tribes, as required by law. Executive Order 13175, implemented under the Clinton Administration and reaffirmed by the Obama Administration states that a meaningful consultation process is to be held - by all federal agencies - when decisions that effect Native American tribes are being considered. "My Administration is committed to regular and meaningful consultation and collaboration with tribal officials in policy decisions that have tribal implications including, as an initial step, through complete and consistent implementation of Executive Order 13175. Accordingly, I hereby direct each agency head to submit to the Director of the Office of Management and Budget (OMB), within 90 days after the date of this memorandum, a detailed plan of actions the agency will take to implement the policies and directives of Executive Order 13175. This plan shall be developed after consultation by the agency with Indian tribes and tribal officials as defined in Executive Order 13175. I also direct each agency head to submit to the Director of the OMB, within 270 days after the date of this memorandum, and annually thereafter, a progress report on the status of each action included in its plan together with any proposed updates to its plan." ~ President Barack Obama, November 5, 2009 The Service has grossly failed to uphold this obligation, though tribes have repeatedly requested consultation. Numerous communications shared by the impacted tribes demonstrated no compliance from the Service, and it appears the Service acted deliberately in ignoring these consultation requests. The Service should not have to be asked to fulfill their federal trust obligations and, in fact, should issue a moratorium on the delisting process until tribes have been consulted in accordance with Presidential Executive Order 13175. Failing to do so is illegal.	Miscellaneous	I oppose removing the GYE Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife As described in the Buffalo Field Campaign response to the delisting proposal by the USFWS http://www.buffalofieldcampaign.org/BFC-grizzly-bear-delisting-comments-May-2016.pdf SERVICE HAS FAILED TO UPHOLD CONSULTATION OBLIGATION WITH TRIBES The grizzly bear holds significant cultural and spiritual importance to many Great Plains and Western tribes. More than fifty tribal nations and organizations have expressed strong opposition to the delisting of grizzly bears, yet the Service and the IGBST have ignored these voices and have failed to hold meaningful consultation with the tribes, as required by law. Executive Order 13175, implemented under the Clinton Administration and reaffirmed by the Obama Administration states that a meaningful consultation process is to be held - by all federal agencies - when decisions that effect Native American tribes are being considered. "My Administration is committed to regular and meaningful consultation and collaboration with tribal officials in policy decisions that have tribal implications including, as an initial step, through complete and consistent implementation of Executive Order 13175. Accordingly, I hereby direct each agency head to submit to the Director of the Office of Management and Budget (OMB), within 90 days after the date of this memorandum, a detailed plan of actions the agency will take to implement the policies and directives of Executive Order 13175. This plan shall be developed after consultation by the agency with Indian tribes and tribal officials as defined in Executive Order 13175. I also direct each agency head to submit to the Director of the OMB, within 270 days after the date of this memorandum, and annually thereafter, a progress report on the status of each action included in its plan together with any proposed updates to its plan." ~ President Barack Obama, November 5, 2009 The Service has grossly failed to uphold this obligation, though tribes have repeatedly requested consultation. Numerous communications shared by the impacted tribes demonstrated no compliance from the Service, and it appears the Service acted deliberately in ignoring these consultation requests. The Service should not have to be asked to fulfill their federal trust obligations and, in fact, should issue a moratorium on the delisting process until tribes have been consulted in accordance with Presidential Executive Order 13175. Failing to do so is illegal.	FWS-R6-ES-2016-0042-5592	
D) The bears of Yellowstone and the GYE have learned cohabitation with humans, and those that have not are not here anymore. They get used to humans, learn to avoid them, or turn them into 'white noise' which allows them to feed in the front country in front of the millions of awed and inspired tourists that come to Yellowstone and the National Forests each year. Once protection is removed, there will be a drastic decline in the population as the bears learn their hard lessons as they simply try to replace their undependable natural food resources and turn to other sources such as trash, bird feeders, gardens and livestock. As we know their slow reproduction ways may not be viable enough to sustain the population if a crash does in fact occur. Add to that the increased pressure on the surrounding land outside Yellowstone with rapid development, and as protection is removed the land will be exploited with mining, fracking, road building all which will ensure the bear's demise. Throw in state management plans of trophy hunting and the bears may not have a chance at all outside the park.	Miscellaneous	Please reconsider your decision of delisting the GYE grizzly bear. Some of the key ideas that need to be reviewed include 1) the population count uncertainties, 2) the ever-changing climate and the effects on key food sources like white bark pine and army cutworm moths, 3) the decline of westslope and yellowstone cutthroat trout (another key food source) due to the nonnative fish introduced into Yellowstone, 4) the future elk population uncertainty as more calves are being consumed by bears to replace other depleted food sources, long term drought and declining snowpack nurturing vegetation and a continued hunting economy outside park borders, 5) the conditioned behavior of grizzly bears to humans under protection which will allow their population to drastically decline once the protection is removed. A) Prior to the recent proposal of delisting the GYE grizzly, the park officials including bear biologists were unable to put a finite number on the grizzly bears. How could they possibly get a definitive number on an 18 million acre area especially when male bears are able to sustain a 1000 square mile roaming territory? We were always told 'around 300-600' for years and years and about the same for black bears (which populations haven't been studied recently at all). All of a sudden there is a definitive number being thrown out there which coincidentally corresponds with the proposed delisting. More research needs to be done to ensure this number is in fact accurate. As we know grizzly bears have such a slow reproduction rate, that if this proposed removal of protection does in fact crash the population they may or may not be able to recover as they did once before. Especially taking into consideration the habitat loss outside the park, increased development and mining, fracking, road building, all of these may not provide the needed habitat that once helped the bears recover. To make a decision based on these facts is premature. Why the rush to a decision when the facts are gray at the least. B) Yes bears have a very diverse diet and can somewhat adapt to the changing environment, it is known that NO food source can replace the caloric content of the white bark pine who are functionally extinct in some areas and with the current trend of future warming climates at high altitudes, this will most likely not allow the white bark pines to make a comeback. Army cutworm moths (another key food source) may not be a dependable food source either, as pesticides affect them in the fields of Kansas and the upper altitude environments may not be suitable in the future with warming temperatures. C) Elk calves have increasingly been consumed by bears in the early summer months, which while great for the bears does add to the overall uncertainty of this key food source as well. Long term drought and natural wolf predation has brought the population into a range of equilibrium, but with the sustained aggressive hunting economy outside the park, the declining snowpack that may not provide as nurturing of vegetation, and the bears themselves increasing predation, the future of yet another key food source is uncertain. D) The bears of Yellowstone and the GYE have learned cohabitation with humans, and those that have not are not here anymore. They get used to humans, learn to avoid them, or turn them into 'white noise' which allows them to feed in the front country in front of the millions of awed and inspired tourists that come to Yellowstone and the National Forests each year. Once protection is removed, there will be a drastic decline in the population as the bears learn their hard lessons as they simply try to replace their undependable natural food resources and turn to other sources such as trash, bird feeders, gardens and livestock. As we know their slow reproduction ways may not be viable enough to sustain the population if a crash does in fact occur. Add to that the increased pressure on the surrounding land outside Yellowstone with rapid development, and as protection is removed the land will be exploited with mining, fracking, road building all which will ensure the bear's demise. Throw in state management plans of trophy hunting and the bears may not have a chance at all outside the park. Please take all these points into consideration as you review the upcoming delisting of the grizzly bear. The value of what the bear means to us, those of us who are in touch with the wild that is, can not even be measured. There is no weight or price	FWS-R6-ES-2016-0042-5566	

The value of what the bear means to us, those of us who are in touch with the wild that is, can not even be measured. There is no weight or price when it comes to measuring a true icon of the wild. Our planet has lost so much of its wildness, lets not add another KEY CHARACTER. Let the Great Spirit of the Bear continue to thrive.E) My family visited Yellowstone last year and were in awe at the sight of the animals. We were fortunate enough to see one of these magnificent animals. Don't take away the dream of thousands to see these great creatures.	Miscellaneous	*Please reconsider your decision of delisting the GYE grizzly bear. Some of the key ideas that need to be reviewed include 1)the population count uncertainties, 2)the ever-changing climate and the affects on key food sources like white bark pine and army cutworm moths, 3)the decline of westslope and yellowstone cutthroat trout (another key food source) due to the nonnative fish introduced into Yellowstone, 4)the future elk population uncertainty as more calves are being consumed by bears to replace other depleted food sources, long term drought and declining snowpack nurturing vegetation and a continued hunting economy outside park borders, 5)the conditioned behavior of grizzly bears to humans under protection which will allow their population to drastically decline once the protection is removed. A)Prior to the recent proposal of delisting the GYE grizzly, the park officials including bear biologists were unable to put a finite number on the grizzly bears. 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Why the rush to a decision when the facts are gray at the least. B)Yes bears have a very diverse diet and can somewhat adapt to the changing environment, it is known that NO food source can replace the caloric content of the white bark pine who are functionally extinct in some areas and with the current trend of future warming climates at high altitudes, this will most likely not allow the white bark pines to make a comeback. Army cutworm moths (another key food source) may not be a dependable food source either, as pesticides affect them in the fields of Kansas and the upper altitude environments may not be suitable in the future with warming temperatures. C)Elk calves have increasingly been consumed by bears in the early summer months, which while great for the bears does add to the overall uncertainty of this key food source as well. Long term drought and natural wolf predation has brought the population into a range of equilibrium, but with the sustained aggressive hunting economy outside the park, the declining snowpack that may not provide as nurturing of vegetation, and the bears themselves increasing predation, the future of yet another key food source is uncertain. D) The bears of Yellowstone and the GYE have learned cohabitation with humans, and those that have not are not here anymore. They get used to humans, learn to avoid them, or turn them into 'white noise' which allows them to feed in the front country in front of the millions of awed and inspired tourists that come to Yellowstone and the National Forests each year. Once protection is removed, there will be a drastic decline in the population as the bears learn their hard lessons as they simply try to replace their undependable natural food resources and turn to other sources such as trash, bird feeders, gardens and livestock. As we know their slow reproduction ways may not be viable enough to sustain the population if a crash does in fact occur. Add to that the increased pressure on the surrounding land outside Yellowstone with rapid development, and as protection is removed the land will be exploited with mining, fracking, road building all which will ensure the bear's demise. Throw in state management plans of trophy hunting and the bears may not have a chance at all outside the park. Please take all these points into consideration as you review the upcoming delisting of the grizzly bear. The value of what the bear means to us, those of us who are in touch with the wild that is, can not even be measured. There is no weight or price	FWS-R6-ES-2016-0042-5566	

Trigger Text	Code(s)	Full Comment Text	Form Letter/Document ID
Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result.	Population parameters	First, I am Wildlife Biologist, former state (Maine and Everglades) and federal. The following is written by Center for Biological Diversity. I have read it and agree wholeheartedly. I will go further by saying that the CBD has become the most effective wildlife conservation entity in America. You are the lead agency responsible for effecting the Endangered Species Act of 1973, and you will be held responsible. - - I know it is not easy and with the Republican interests attacking the ESA more aggressively than ever, it is becoming more difficult. But the right decisions must still be made, regardless of how difficult. - - Following the CBD's words. - - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD
Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities.	Population parameters	Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities. Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 -- and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears. - - The plan presents a potentially tremendous setback. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - - Yellowstone's bears have also long been isolated from other bear populations, forcing the government to keep them on permanent life support by proposing to truck in bears to avoid health issues caused by inbreeding. This fact further highlights the need for recovering grizzlies in more places. - - I am asking the Service to maintain protections for Yellowstone grizzly bears. If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts - - I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD
The FWS estimates a GYE grizzly population of about 700 animals, but this is the census size (N). The science of conservation genetics (in which I have some expertise) tell us that the most important number is not N, but rather the "effective population size" (Ne) - basically the number of individuals that successfully reproduce each generation	Population parameters	I am writing to urge you to maintain federal ESA listing for grizzly bears in the Greater Yellowstone Ecosystem (GYE) -- a high-profile population that we as a nation have invested in since 1975. The FWS estimates a GYE grizzly population of about 700 animals, but this is the census size (N). The science of conservation genetics (in which I have some expertise) tell us that the most important number is not N, but rather the "effective population size" (Ne) - basically the number of individuals that successfully reproduce each generation. Depending on the sex ratio and age structure of sexually mature individuals, the number of breeding adults will be LOWER to FAR LOWER than the census size, and in terms of genetic health and long-term viability of a population, THIS IS WHAT COUNTS. (We have learned this the hard way with the Florida Cougar!). Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. - - Despite positive demographic trends since ESA listing of the GYE grizzlies, this population remains severely isolated, which will jeopardize the long-term viability of this population until some connectivity can be established with other populations. Without some assurance that surrounding states can protect bears that attempt to disperse, should ESA restrictions be lifted, this listing should be maintained. Artificially moving GYE bears to other populations (Northern Rockies) and vice-versa may be necessary in the short term, but this amounts to "ecologically baby-sitting" and is not a long term strategy. Corridors must be developed and then maintained long enough to document successful dispersal and reproduction by bears into and out of the GYE, and then delisting would be justified. I hope you will reconsider the delisting proposal and keep the GYE bears protected until they can become part of a larger meta-population group. - - Sincerely,	CBD
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If the given figures are correct, there are about 800 bears now, so they should NOT BE DE-LISTED yet. They were put on the Endangered Species list when there were 1600 bears. I was part of that. So when only 1600 Grizzlies were listed as endangered, how is it that 800 bears can be de-listed? That simply does not add up	Population parameters	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. When I visited Yellowstone in the early 1970s, there were 1600 Grizzly Bears in the Yellowstone area. Those numbers have gone down a lot, so I am wondering about this so called 'recovery' First, Grizzly bear habitat protections and demographic standards are too limited in geographic scopeâ€”they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. If the given figures are correct, there are about 800 bears now, so they should NOT BE DE-LISTED yet. They were put on the Endangered Species list when there were 1600 bears. I was part of that. So when only 1600 Grizzlies were listed as endangered, how is it that 800 bears can be de-listed? That simply does not add up. Grizzly bears are an iconic animal in Westâ€”they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition

Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population.	Population parameters	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC
Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock.	Population parameters	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC
Please accept my comments Delist the grizzly bears. I have seen them in the Lander foothills . There are too many of them and need to be delisted. They affect my hunting, horses, livestock negatively. We have plenty in the Yellowstone environment. I do not want them around the Lander area!	Population parameters	Please accept my comments Delist the grizzly bears. I have seen them in the Lander foothills . There are too many of them and need to be delisted. They affect my hunting, horses, livestock negatively. We have plenty in the Yellowstone environment. I do not want them around the Lander area!	GYC
Maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans	Population parameters	Please accept my comments on the proposed delisting rule. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. The country's grizzly bears are almost all habituated to humans, with most willing to co-exist and not harm us. They normally do not see people as food or as harmful. Hunting them is taking unfair advantage and needlessly killing creatures that we can live in harmony with. When a bear becomes a danger to people or animals, then it can be removed from the population. Include a campaign to change people's attitudes first. Protect core habitat. There needs to be a corridor from Yellowstone to the Yukon (the Y to Y project). Please support that so that the grizzly population can become self sustaining, with or without people, with or without special protections, as part of a natural ecosystem. They need to be able to travel to find food and other non-related bears. - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. -Maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. Maintaining a stable population will depend on the grizzly's food supply in a human-free habitat, which is in great fluctuation now. Commit to reducing conflicts. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. A campaign and bear-proof garbage containers to start. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other agencies involved. Many volunteers and local groups are ready, willing, and able to help. Please change the proposed plan for the better. Show that we have learned how to manage wildlife better over these past years when we didn't do so well. Take the words 'extermination', 'killing', 'removing', and 'reducing the population' out of your dictionary. It's our country too and many of us love to see grizzly bears.	GYC
A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range.	Population parameters	I am writing to ask that you do not delist Yellowstone grizzly bears. Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered. Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society
All apex predators occupy an important niche and provide an important function toward keeping their ecosystem healthy. The truth of this scientific principle has been amply shown by the re-introduction of wolves to Yellowstone. When Grizzly bears have reached their optimal population, it will stop growing and, like the wolves, will stabilize. Yet, their current numbers suggest that Grizzly bears are far from recovered and need to maintain their ESA protections.	Population parameters	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. All apex predators occupy an important niche and provide an important function toward keeping their ecosystem healthy. The truth of this scientific principle has been amply shown by the re-introduction of wolves to Yellowstone. When Grizzly bears have reached their optimal population, it will stop growing and, like the wolves, will stabilize. Yet, their current numbers suggest that Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition
All the money and work by the federal government to reinstate grizzly bears to this territory is going to be nullified in a very short time, because there just aren't enough grizzly bears to allow both hunting and the sustaining of a healthy grizzly bear population.	Population parameters	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. All the money and work by the federal government to reinstate grizzly bears to this territory is going to be nullified in a very short time, because there just aren't enough grizzly bears to allow both hunting and the sustaining of a healthy grizzly bear population. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition

The grizzly bears that live in and around Yellowstone make up almost half the population in the lower 48 states, and now those bears are at risk. In 2015, their numbers in the Yellowstone area declined by 40, to an estimated 717 from 757 -- a 6 percent drop that represents the highest one-year mortality since grizzlies were given federal protection in 1975. Despite this decline, the U.S. Fish and Wildlife Service is currently preparing to strip the animals of their Endangered Species Act protection.	Population parameters	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. Preserving federal protections for grizzly bears is paramount to species' survival BY GARY CARTER SPECIAL TO THE DAILY CALLAST UPDATED APRIL 1, 2016 Comment 3 In 1805, the explorers Meriwether Lewis and William Clark, making their way across the West, were warned by Native American tribes of grizzly bears' awesome strength. At first, Lewis scoffed at the tribes' advice, writing in his journal that "in the hands of skillful riflemen they are by no means as formidable or dangerous as they have been represented." A few terrifying encounters with the bears, though, changed his mind about that. A little more than a century later, crowds at Yellowstone National Park would gather in delight to watch the bears dine on food scraps. Signs were marked "Lunch Counter ... for Bears Only." Those days are long gone, but crowds still flock to Yellowstone -- nearly 4 million visitors every year -- partly to catch a glimpse of the storied creatures. The grizzly bears that live in and around Yellowstone make up almost half the population in the lower 48 states, and now those bears are at risk. In 2015, their numbers in the Yellowstone area declined by 40, to an estimated 717 from 757 -- a 6 percent drop that represents the highest one-year mortality since grizzlies were given federal protection in 1975. Despite this decline, the U.S. Fish and Wildlife Service is currently preparing to strip the animals of their Endangered Species Act protection. The agency is under pressure from the states around Yellowstone -- Wyoming, Montana and Idaho -- to allow hunting of bears that roam outside the park's boundaries. Now, the proposal to call the bears recovered and remove their protection is imminent. If the rule is finalized, it's likely to allow states to reduce bear numbers by more than 100 practically overnight. But the bears are already struggling, threatened by declines in important foods such as white-bark pine and Yellowstone cutthroat trout, as well as by their isolation from other grizzly populations. Historically, grizzlies ranged from Alaska to Mexico, with at least 50,000 bears living in the western half of the contiguous United States. Today only about 1,500 to 1,700 grizzlies survive outside Alaska, in five isolated populations in the northern Rocky Mountains and the Cascades. Numbers in the Greater Yellowstone area have increased since the animals were first given federal protection, but they continue to be threatened by climate change and food shortages. Over all, grizzly bears still occupy only 2 to 4 percent of their ancient range in the lower 48 states. In June 2014, we filed a "recovery plan petition" asking the Fish and Wildlife Service to recover grizzlies in more of their historic range, including parts of Colorado and Utah; in December, we further petitioned to reintroduce bears into the Selway-Bitterroot Wilderness in Idaho. The Endangered Species Act requires that a species be protected in each "significant portion of its range" -- the law's intent being not only to temporarily stave off extinction, but also to recover species so they can persist into the future. But the service has been systemically ignoring -- indeed actively working to redefine and thus dismantle -- this "significant portion of its range" requirement under both the George W. Bush and Barack Obama administrations. Dozens of native tribes have also been fighting to stop federal removal of protection, asserting it would violate the American Indian Religious Freedom Act. Tribal advocates for grizzlies feel disrespected or disenfranchised by the government's delisting plan. A new draft agreement among the three Yellowstone-area states, recently leaked to the press, outlines the states' proposed authority to kill or allow the killing of bears that wander outside the park. Bears that wander even farther, past a "demographic monitoring area" to be set up by the states and the federal agency -- and of course, invisible to both bears and people -- would not count toward the total and could therefore be shot without penalty. Yet these roaming bears, which may disperse hundreds of miles to mate, are precisely the animals that are needed to convey genetic diversity among populations. If dispersing bears are shot without restraint, chances of the species' survival will be sharply lowered. Keeping federal protections in place is the best way to keep these great beasts alive. When federal protection was stripped from some states' populations of gray wolves, and wolf management was left to those states, wolves there became instant targets, resulting in more than 3,500 wolf killings between 2011 and January 2015. It would be tragic to repeat the same mistake with grizzlies. Gary Carter is a conservationist and resident of South Carolina.	Humane Society Petition
Yes, grizzly numbers in the Greater Yellowstone Ecosystem have grown from a low near 150 before listing, to over 700. Seven Hundred.....not a large number by any means. Couple that with the facts that they are very slow to reproduce, have at best a 50% chance of making it to breeding age and their primary food sources are being devastated by climate change make this rebound in numbers tenuous at best.	Population parameters	Many have stated on social media and in articles concerning the subject that appealing to your office and the state governments of Idaho, Montana and Wyoming is a waste of time. As far as I am concerned, you are still part of the US Government and, as such, for the people. Therefore, I am confident that you will treat the concerns of all constituents with thoughtful consideration in this and all matters related to your work. Yes, grizzly numbers in the Greater Yellowstone Ecosystem have grown from a low near 150 before listing, to over 700. Seven Hundred.....not a large number by any means. Couple that with the facts that they are very slow to reproduce, have at best a 50% chance of making it to breeding age and their primary food sources are being devastated by climate change make this rebound in numbers tenuous at best. At this time, there is no economic or safety value to delisting. "Problem" bears are still handled on a case by case basis and economically, their value as a draw to the National Parks (Yellowstone and Teton) where they reside is estimated to be greater than \$10,000,000 per year. Any income gained by delisting and issuing hunting permits would be short lived and modest to nonexistent in comparison. The argument that trophy hunting will be economically important to saving the grizzly is arcane and outdated. One should also factor in the sentiments not only of our nation, but that of people from around the globe, many whom travel to the US annually for the chance of glimpsing one of these iconic bears. How can we ask other nations to conserve and protect their wildlife when we stop protecting ours? And, yes, they are a keystone species. Their recovery, along with that of the two other major predators in Greater Yellowstone, the wolf and the mountain lion, have been shown to have improved the health of the entire ecosystem. I hope that you will consider this argument and that, in the final vote, our federal government will stand behind continuing to protect this iconic species.	Humane Society Petition
I KNOW THAT IF THERES TOO MANY OF ANYTHING, THEY CAN STARVE OR OVERPOPULATE, BUT THESE GRIZZLY BEARS ARE NOT OVERPOPULATED AND SHOULD REMAIN ON THE PROTECTED SPECIES LIST FOR NOW!!	Population parameters	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. This is Bullcrap, that you would let trophy hunters get at them when the population is not yet recovered!! ARE YOU BEING BRIBED? that's what hundreds of people are saying in chat rooms and various groups who oppose trophy hunting! What's WRONG WITH YOU GUYS!!?? MY FATHER WAS A WILDLIFE BIOLOGIST WITH THE COLORADO GAME AND FISH DEPARTMENT ALL OF HIS LIFE. I KNOW THAT IF THERES TOO MANY OF ANYTHING, THEY CAN STARVE OR OVERPOPULATE, BUT THESE GRIZZLY BEARS ARE NOT OVERPOPULATED AND SHOULD REMAIN ON THE PROTECTED SPECIES LIST FOR NOW!! A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition
And in general stop doing this to newly recovered animals (wolves in Minnesota for instance). There needs to be a more scientific approach to how you define population baselines in order to determine if an animal is ready to be removed from pritection. Studies have shown that this would have to be the populations from before ANY peoples were on the continent! That would require populations at least ten times larger than you are currently deeming appropriate .	Population parameters	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. And in general stop doing this to newly recovered animals (wolves in Minnesota for instance). There needs to be a more scientific approach to how you define population baselines in order to determine if an animal is ready to be removed from pritection. Studies have shown that this would have to be the populations from before ANY peoples were on the continent! That would require populations at least ten times larger than you are currently deeming appropriate.	Humane Society Petition
Grizzly bears in America are nowhere near overpopulation and pose no unreasonable threat to humans. There is no humane excuse or safety reason to allow senseless killing of these animals for sport or profit.	Population parameters	Grizzly bears in America are nowhere near overpopulation and pose no unreasonable threat to humans. There is no humane excuse or safety reason to allow senseless killing of these animals for sport or profit. The grizzly bear population is far from recovered and we need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition

as well as by their isolation from other grizzly populations. Historically, grizzlies ranged from Alaska to Mexico, with at least 50,000 bears living in the western half of the contiguous United States. Today only about 1,500 to 1,700 grizzlies survive outside Alaska, in five isolated populations in the northern Rocky Mountains and the Cascades.	Population parameters	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. Preserving federal protections for grizzly bears is paramount to species' survival BY GARY CARTER SPECIAL TO THE DAILY CALLAST UPDATED APRIL 1, 2016 Comment 3 In 1805, the explorers Meriwether Lewis and William Clark, making their way across the West, were warned by Native American tribes of grizzly bears' awesome strength. At first, Lewis scoffed at the tribes' advice, writing in his journal that "in the hands of skillful riflemen they are by no means as formidable or dangerous as they have been represented." A few terrifying encounters with the bears, though, changed his mind about that. A little more than a century later, crowds at Yellowstone National Park would gather in delight to watch the bears dine on food scraps. Signs were marked "Lunch Counter ... for Bears Only." Those days are long gone, but crowds still flock to Yellowstone -- nearly 4 million visitors every year -- partly to catch a glimpse of the storied creatures. The grizzly bears that live in and around Yellowstone make up almost half the population in the lower 48 states, and now those bears are at risk. In 2015, their numbers in the Yellowstone area declined by 40, to an estimated 717 from 757 -- a 6 percent drop that represents the highest one-year mortality since grizzlies were given federal protection in 1975. Despite this decline, the U.S. Fish and Wildlife Service is currently preparing to strip the animals of their Endangered Species Act protection. The agency is under pressure from the states around Yellowstone -- Wyoming, Montana and Idaho -- to allow hunting of bears that roam outside the park's boundaries. Now, the proposal to call the bears recovered and remove their protection is imminent. If the rule is finalized, it's likely to allow states to reduce bear numbers by more than 100 practically overnight. But the bears are already struggling, threatened by declines in important foods such as white-bark pine and Yellowstone cutthroat trout, as well as by their isolation from other grizzly populations. Historically, grizzlies ranged from Alaska to Mexico, with at least 50,000 bears living in the western half of the contiguous United States. Today only about 1,500 to 1,700 grizzlies survive outside Alaska, in five isolated populations in the northern Rocky Mountains and the Cascades. Numbers in the Greater Yellowstone area have increased since the animals were first given federal protection, but they continue to be threatened by climate change and food shortages. Over all, grizzly bears still occupy only 2 to 4 percent of their ancient range in the lower 48 states. In June 2014, we filed a "recovery plan petition" asking the Fish and Wildlife Service to recover grizzlies in more of their historic range, including parts of Colorado and Utah; in December, we further petitioned to reintroduce bears into the Selway-Bitterroot Wilderness in Idaho. The Endangered Species Act requires that a species be protected in each "significant portion of its range" -- the law's intent being not only to temporarily stave off extinction, but also to recover species so they can persist into the future. But the service has been systemically ignoring -- indeed actively working to redefine and thus dismantle -- this "significant portion of its range" requirement under both the George W. Bush and Barack Obama administrations. Dozens of native tribes have also been fighting to stop federal removal of protection, asserting it would violate the American Indian Religious Freedom Act. Tribal advocates for grizzlies feel disrespected or disenfranchised by the government's delisting plan. A new draft agreement among the three Yellowstone-area states, recently leaked to the press, outlines the states' proposed authority to kill or allow the killing of bears that wander outside the park. Bears that wander even farther, past a "demographic monitoring area" to be set up by the states and the federal agency -- and of course, invisible to both bears and people -- would not count toward the total and could therefore be shot without penalty. Yet these roaming bears, which may disperse hundreds of miles to mate, are precisely the animals that are needed to convey genetic diversity among populations. If dispersing bears are shot without restraint, chances of the species' survival will be sharply lowered. Keeping federal protections in place is the best way to keep these great beasts alive. When federal protection was stripped from some states' populations of gray wolves, and wolf management was left to those states, wolves there became instant targets, resulting in more than 3,500 wolf killings between 2011 and January 2015. It would be tragic to repeat the same mistake with grizzlies. Gary Carter is a conservationist and resident of South Carolina.	Humane Society Petition
We need to stay away from their breeding grounds and let them flourish and get back to the levels that are safe. Please take this request seriously.	Population parameters	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. Please do not give these hunters a green light to kill these animals. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. We are creating an environment, that hunters are wiping out the natural environment of the animals that they need to kill and hang on their walls. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. We need to stay away from their breeding grounds and let them flourish and get back to the levels that are safe. Please take this request seriously.	Humane Society Petition
Scientists tell us that keeping these grizzly bears on the list is the correct course of action, exactly because their population is nowhere near their pre-settlement population in the lower 48 states.	Population parameters	We need to continue to increase the bear population, not allow their numbers to drop for sport, especially in the GYW area. Scientists tell us that keeping these grizzly bears on the list is the correct course of action, exactly because their population is nowhere near their pre-settlement population in the lower 48 states.	Humane Society Petition
During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably happened. This totals over 90 bears, or in excess of 12% of the population.	Population parameters	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. With the lowest reproductive rate of any mammal in North America, grizzly bears cannot sustain many deaths, especially among adults. Most grizzlies die because people kill them, so controlling the rates at which we kill these animals is crucial. In fact, the ESA has been vital to reducing rates of human-caused grizzly bear mortality. Under the ESA, killing grizzly bears is prohibited except in self-defense situations. Hunting is banned. And poachers have been successfully prosecuted under the Act, with some paying hefty fines. Given the ethos of the states, who appear more interested in appeasing ranchers and hunters, claims that the states would exercise caution after delisting sound facile. We can predict what will happen without the curbing effects of the ESA, as pressure mounts from the politically well-connected few who want to kill more bears. The states are likely to unabashedly react to conflicts, not with compassion but with firepower. Grizzly bears should expect anything but a safety net from the states. There is every reason to believe that, over time, state management will reverse the gains made over the last 40 years of endangered species protections. This is especially likely given the crisis that Yellowstone grizzly bears are facing now. During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably happened. This totals over 90 bears, or in excess of 12% of the population. And this with the federal safety net. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition
Don't delist the Grizzlies! Over 60 were killed last year in the GYE. There were not that many cubs born last year!	Population parameters	Don't delist the Grizzlies! Over 60 were killed last year in the GYE. There were not that many cubs born last year!	WELC
The grizzly has such a slow reproductive capacity, that this small and fragmented US population MUST remain protected for the foreseeable future, as the few states holding populations cannot be trusted to use science to understand the consequences of their already publicized intents to create a public market for the killing of these important apex predators and scavengers.	Population parameters	Greater Yellowstone Ecosystem Grizzlies remain isolated from the main population, and delisting with its consequent state public hunting will so further diminish the genetic diversity of that population, that the delisting will effectively slowly extinguish the species. The grizzly still only occupies a very tiny percentage of its historical habitat. Until sufficient subpopulation connectivity is established, and grizzly can naturally disperse into the western US, no delisting is appropriate. State control of predators has proven to be excessively draconian, turning the tiny remnant predator populations of predators not ESA listed into persecuted and very like nonviable over the long-term, unless permanent bans on public hunting can be established. The grizzly has such a slow reproductive capacity, that this small and fragmented US population MUST remain protected for the foreseeable future, as the few states holding populations cannot be trusted to use science to understand the consequences of their already publicized intents to create a public market for the killing of these important apex predators and scavengers.	WELC
Grizzlies have the lowest reproduction rate of any North American mammal. They need to reach other grizzly populations for biological diversity.	Population parameters	Grizzlies have the lowest reproduction rate of any North American mammal. They need to reach other grizzly populations for biological diversity. Their food sources are being impacted by global warming. If their numbers get too low they may never recover. If they are delisted, don't hunt them. If they are hunted, there should be a no hunting corridor between and around the parks. Do NOT delist the grizzlies!	WELC
They have a high mortality rate and low reproduction rate.	Population parameters	Grizzlies of the Greater Yellowstone Ecosystem are still in danger. Climate change has affected their food sources and they don't have genetic diversity. They have a high mortality rate and low reproduction rate. Surrounding States are already planning to sell trophy hunting licenses to kill 100 grizzlies. The science prices all these issues and should be listened to. Logging, mining, and ranching interests support delisting for monetary gain. The ecotourism industry brings millions of dollars a year to the area because visitors want to see grizzlies and wolves. Please listen to science and don't let your legacy be a bear rug. #DontDelistGrizzlies	WELC
Grizzly bears are still dangerously close to extinction levels. They absolutely should NOT be removed from the Endangers Species Action protection.	Population parameters	Grizzly bears are still dangerously close to extinction levels. They absolutely should NOT be removed from the Endangers Species Action protection.	WELC
Their population has not fully recovered and I am tired of having USFWS tell the taxpayers that these bears need management. This is another apex predator that can self regulate its population if ranchers would pay more attention to taking care of their livestock on public and private land with non lethal deterrents.	Population parameters	Grizzly bears are still under the ESA in Yellowstone Park. They still need protection so don't strip them of this. Their population has not fully recovered and I am tired of having USFWS tell the taxpayers that these bears need management. This is another apex predator that can self regulate its population if ranchers would pay more attention to taking care of their livestock on public and private land with non lethal deterrents. If they truly cared about their livestock and the loss of money when they lose one to predation they would get a livestock guard dog and use fladry, noise deterrents, and range riders, just like they should for the wolves. Believe it or not, more people are getting turned off by eating beef and not just for health reasons.	WELC

While grizzlies have made a comeback, their recovery is still a delicate and uncertain effort. Grizzly bears occupy less than 2% of their historic range in the lower 48 and reproduce very slowly, at a rate of only 1-2 cubs every few years. In the Yellowstone region, the growth of the population has stalled since the early 2000s, and there was a 6% decline last year.	Population parameters	I am writing to urge you to postpone delisting of the Yellowstone grizzly bear population. The proposal to remove Yellowstone grizzly bears from the endangered species list fails to preserve the progress made toward bear recovery. In fact, it will reverse it. The Greater Yellowstone grizzly bear is one of the United States' most iconic species. Held sacred by native communities for thousands of years in the west, the majestic grizzly has become a treasured symbol of our wild heritage. Visitors spend millions of dollars in the region every year, a vital part of many local economies, in the hopes of spotting a magnificent grizzly. The loss of the grizzly would be a loss for the entire region, and a disservice to the wildlife professionals, dedicated conservationists and wildlife advocates who have fought to save them. While grizzlies have made a comeback, their recovery is still a delicate and uncertain effort. Grizzly bears occupy less than 2% of their historic range in the lower 48 and reproduce very slowly, at a rate of only 1-2 cubs every few years. In the Yellowstone region, the growth of the population has stalled since the early 2000s, and there was a 6% decline last year. The proposed rule leaves Greater Yellowstone grizzlies in the crosshairs, as states have made clear their plans to reduce the population, including through trophy hunts. Management of grizzly bears outside of the national parks would be left completely up to the states, which have historically been hostile to bears and other large carnivores. The current proposal would allow states to exceed maximum bear deaths for years before any review, allowing for potentially irreversible damage, and would allow complete eradication of bears in some areas. The loss of female grizzlies to trophy hunters who will not be able to tell the difference between a male and female bear could cause a steep, quick decline before emergency action can be taken. Additionally, the Yellowstone grizzly population remains isolated; further limiting their range and numbers could prevent them from ever connecting to other grizzly populations. People and bears can coexist. We should not let bears slide back towards extinction because of misplaced political hostility towards these magnificent and beloved creatures. The end result of this proposal will be fewer bears limited to less land and with access to fewer resources necessary for survival. For too long, human beings have assumed animals are non-sentient, unintelligent and, therefore, ours to disrespect and exploit as we will. Today, often new research is published that denies humankind's previously arrogant assumptions about other species, and our lack of respect and care must change. Money and politics should not have the weight that they do on what is essentially an ethical question.	WELC
I believe that grizzly bear populations are still too low to remove them from the ESA.	Population parameters	I believe that grizzly bear populations are still too low to remove them from the ESA. Threats of hunting cannot be understated and illegal killings are likely to increase as well. I do not believe the genetic diversity of existing populations can be preserved without the ESA. I believe that delisting will put the long term viability of this species at grave risk. Considering the rash of proposed ESA delistings in the last few years that have been based on flawed and weak claims not justified by the scientific record, I am extremely skeptical that delisting the grizzly is justified.	WELC
If Bear population can only reproduce 600 in number in 40 years, or just 15 bears a year that can survive, why is that even a problem in of all things, too many? Our US population has tripled from 120 million to 350 million in just 60 years...now thats a problem!	Population parameters	If Bear population can only reproduce 600 in number in 40 years, or just 15 bears a year that can survive, why is that even a problem in of all things, too many? Our US population has tripled from 120 million to 350 million in just 60 years...now thats a problem!	WELC
It is very premature to delist grizzly bears. Their numbers have just now started to recover and to delist them now just as they are starting to recover would be catastrophic for their population due to low birth rates for the species.	Population parameters	It is very premature to delist grizzly bears. Their numbers have just now started to recover and to delist them now just as they are starting to recover would be catastrophic for their population due to low birth rates for the species.	WELC
They have barely recovered and are not near the numbers that would provide any protection from the smallest threat. Don't develop the habit of dropping protection from important predators just because they become common enough that people see one now and then.	Population parameters	Please extend the protection of Grizzly bears. They have barely recovered and are not near the numbers that would provide any protection from the smallest threat. Don't develop the habit of dropping protection from important predators just because they become common enough that people see one now and then.	WELC
Simply because a population is on the rise doesn't automatically mean they are at a recoverable level. Don't delist these bears.	Population parameters	Simply because a population is on the rise doesn't automatically mean they are at a recoverable level. Don't delist these bears.	WELC
since bears do not reproduce as quickly as other species, to kill numerous bears would set the survival of the species back many years	Population parameters	since bears do not reproduce as quickly as other species, to kill numerous bears would set the survival of the species back many years	WELC
If delisted, grizzlies in Montana, Idaho, and Wyoming would face being hunted and killed for the first time in 40 years. Grizzlies are iconic wildlife in the American West critical to the health of the West's ecosystems. Their population has not fully recovered; and so long as the animals' survival is threatened, all grizzlies require continued Endangered Species Act protection.	Population parameters	We oppose your proposal to strip grizzly bears in the Greater Yellowstone Ecosystem of their Endangered Species Act protection. If delisted, grizzlies in Montana, Idaho, and Wyoming would face being hunted and killed for the first time in 40 years. Grizzlies are iconic wildlife in the American West critical to the health of the West's ecosystems. Their population has not fully recovered; and so long as the animals' survival is threatened, all grizzlies require continued Endangered Species Act protection.	WELC
Whitebark pine is declining significantly and that is a major food source. To compensate bears are having to turn to other food sources including hunting more game. That increases their chances for injury as well as more human-bear conflict. Less youngsters are surviving the last several years as well. When you consider how slowly a female bear of cub-bearing age is replaced losing even a single bear can have big consequences. Opening the bear to hunting will allow for that to happen quickly and it may be too late to stop a crash in the population by the time it is detected.	Population parameters	Please, keep the grizzly bears on the endangered list. The population has leveled off in recent years and I do not believe it is simply as a response to the available land reaching capacity. Whitebark pine is declining significantly and that is a major food source. To compensate bears are having to turn to other food sources including hunting more game. That increases their chances for injury as well as more human-bear conflict. Less youngsters are surviving the last several years as well. When you consider how slowly a female bear of cub-bearing age is replaced losing even a single bear can have big consequences. Opening up the bear to hunting will allow for that to happen quickly and it may be too late to stop a crash in the population by the time it is detected. I do not believe the states and federal government have the capacity to monitor hunting and the bear population adequately. This population is cut off from the rest, there is no natural corridor to improve genetic diversity or to support growth. Even from purely economical perspective if we start losing bears the states will lose money from tourists, who come specifically to view those magnificent creatures. Please, re-consider this proposed action and give the bears more time to adapt to the changes in climate and environment.	FWS-R6-ES-2016-0042-0016
Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. A	Population Parameters	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? - Bears are facing an uncertain future. Last year alone 43 bears were killed in conflicts, most of which were food related deaths.	FWS-R6-ES-2016-0042-0320

Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period.	Population Parameters	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? - Bears are facing an uncertain future. Last year alone 43 bears were killed in conflicts, most of which were food related deaths.	FWS-R6-ES-2016-0042-0320
I oppose this proposal because there is still no secure grizzly population in the vast Central Idaho Wildlands even though plans were prepared some 20 years ago to translocate suitable bears into Idaho. This population will be essential to link up with the Yellowstone bears and more northern bear populations to form a truly recovered meta-population of grizzlies in the Lower 48. Until we have such an Idaho population I will know that the USFWS is not serious about achieving true Yellowstone grizzly recovery and I will continue to oppose a Delisting Rule.	Population parameters	I oppose the proposed Yellowstone Grizzly Bear Delisting Rule removing the bear from the protections of the Endangered Species Act at this time. I oppose this proposal because the Yellowstone grizzly lives on an island. This island has been isolated from other bear populations for over 100 years. As of this date the bears are still isolated from other populations and there is no provision in this delisting proposal to assure protected linkage habitat to other populations. In fact, the reverse is currently taking place with the US Sheep Experimental Station in the Centennial Mountains of Montana/Idaho still insisting that they must run sheep in this important linkage zone between Yellowstone and the vast central Idaho Wildlands (read their current EIS). The Sheep Station insistence that domestic sheep must take precedence over public wildlife helps insure that the Yellowstone bears will remain on an island. I oppose this proposal because there is still no secure grizzly population in the vast Central Idaho Wildlands even though plans were prepared some 20 years ago to translocate suitable bears into Idaho. This population will be essential to link up with the Yellowstone bears and more northern bear populations to form a truly recovered meta-population of grizzlies in the Lower 48. Until we have such an Idaho population I will know that the USFWS is not serious about achieving true Yellowstone grizzly recovery and I will continue to oppose a Delisting Rule. I oppose this proposal because it will grant the states the right to begin to systematically target grizzlies attempting to recolonize former occupied habitat outside of a "Demographic Monitoring Area" for trophy sport hunts and this will guarantee that true grizzly recovery will be stopped in its tracks. A wide ranging top-level opportunistic omnivore such as the grizzly can not be turned over to the provincial interests of the livestock driven agendas of the state game departments of Wyoming, Idaho and Montana. I oppose this proposal because it does not take into account the unavoidable declining food resources in the Yellowstone core that will accompany the global climate change that is now underway. The grizzlies are adaptable but we must give them the room to adapt in the face of climate change. The State of Wyoming has no intention of giving them that room. The best scenario that this will result from the Delisting Rule is maintenance of a relic population of bears but it can not and will achieve true Yellowstone grizzly bear recovery. The bears must be allowed to disperse into all biologically suitable habitat. An example--The Wyoming Range likely has some of the best bear habitat in the Greater Yellowstone Ecosystem. Because of livestock political power the State of Wyoming considers any bears who attempt to recolonize this superb habitat to be expendable and, beyond doubt, they will be high on the list for trophy, sport hunts. To repeat--to turn management of the Yellowstone grizzlies over to the states will assure that all the investment of time and money up to now toward recovering these bears will be for naught and we will have snatched "defeat right out of the jaws of victory". Now is not the time to turn back. I oppose this premature Proposed Rule for Yellowstone Grizzly Bear Delisting from the Endangered Species Act.	FWS-R6-ES-2016-0042-1109
Biologist: Yellowstone Grizzlies Can't Afford Any Increase In Mortality This was the response David Mattson, a retired bear biologist and ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone gave when asked whether the Yellowstone Grizzly population is big enough that it could sustain any mortality from sport hunting? David Mattson also disagrees with the USFWS's contention that the number of bears has reached the [Greater Yellowstone Ecosystem's] carrying capacity. To the contrary, Mr. Mattson argues that carrying capacity has in fact declined. He stated, "because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millennial drought which is promising more of the same to come, that we've seen a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods". He further added, "while we have seen an increase in the distribution of the bear population, probably by 30 to 40% since the early 2000s, at the same time, we haven't seen any increase in the population". Because the Grizzly population is becoming increasingly vulnerable, and because state wildlife management is such a poor alternative, and in dire need of reform, Mr. Mattson strongly opposes delisting. In light of these statistics, the decision to remove Greater Yellowstone Grizzlies from federal protection under the Endangered Species Act would be disastrous. As a taxpayer, as a frequent visitor to Yellowstone and as a great appreciator of the Grizzly Bears and their impact not only on the environment but our lives, I respectfully ask that you do not delist them.	Population parameters	Biologist: Yellowstone Grizzlies Can't Afford Any Increase In Mortality This was the response David Mattson, a retired bear biologist and ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone gave when asked whether the Yellowstone Grizzly population is big enough that it could sustain any mortality from sport hunting? David Mattson also disagrees with the USFWS's contention that the number of bears has reached the [Greater Yellowstone Ecosystem's] carrying capacity. To the contrary, Mr. Mattson argues that carrying capacity has in fact declined. He stated, "because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millennial drought which is promising more of the same to come, that we've seen a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods". He further added, "while we have seen an increase in the distribution of the bear population, probably by 30 to 40% since the early 2000s, at the same time, we haven't seen any increase in the population". Because the Grizzly population is becoming increasingly vulnerable, and because state wildlife management is such a poor alternative, and in dire need of reform, Mr. Mattson strongly opposes delisting. In light of these statistics, the decision to remove Greater Yellowstone Grizzlies from federal protection under the Endangered Species Act would be disastrous. As a taxpayer, as a frequent visitor to Yellowstone and as a great appreciator of the Grizzly Bears and their impact not only on the environment but our lives, I respectfully ask that you do not delist them.	FWS-R6-ES-2016-0042-2215
Every scientific study has determined that these animals are intelligent and non-aggressive. They also reproduce at a slow rate, and missteps in management have done long lasting damage.	Population parameters	See Attached Attachments Bayly Phillip	FWS-R6-ES-2016-0042-2457
Just because the population is has increased isn't enough reason to open the doors to hunting of these animals. Especially since you have noted in your Proposal: Grizzly bears have one of the slowest reproductive rates among terrestrial mammals, resulting primarily from the reproductive factors described above: Late age of first reproduction, small average litter size, and the long interval between litters.... Given the above factors, it may take a female grizzly bear 10 or more years to replace herself in a population. Grizzly bear females cease reproducing some time in their mid-to-late 20s. Doesn't this indicate that if you allow hunting of the Grizzly, it would become necessary down the road to institute a protected status again? Additionally, to further quote your Proposed Rule, "For grizzly bear populations, lambda estimates the average rate of annual growth, with a value of 1.0 indicating a stable population trend with no net growth or decline," if the lambda is stable, wouldn't allowing hunting begin to reduce the population to a negative lambda? Why promote hunting a species that has been designated at risk of extinction not so long ago. Can we not allow the stability to continue? And again from your Proposed Rule: "For long-lived mammals such as grizzly bears, extensive data collected over decades are needed to understand if and how these factors are operating in a population. We have these data for the GYE grizzly bear population, and the IGBST has been able to tease apart some of these confounding effects to find that density-dependent effects are the likely cause of the recent slow in population growth (see Changes in Food Resources under Factor E, below, for more detailed information)." If the population growth is slowing, let's not impose further growth reduction through hunting. Your report indicates: "Grizzly bears are a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality and the manageable nature of this threat." Let's continue to protect, not weed out through hunting permits. I don't have a problem with management removals, but I don't trust that hunting can be well-regulated. The purpose of hunting Grizzlies would be for trophies, not food. This is not a good use of management techniques. Controlling human interaction with the Grizzly population is a more suitable management procedure. Hunting is the worst possible approach. Please do not allow hunting of the Grizzly. Please. Chesa Keane	Population parameters	Just because the population is has increased isn't enough reason to open the doors to hunting of these animals. Especially since you have noted in your Proposal: Grizzly bears have one of the slowest reproductive rates among terrestrial mammals, resulting primarily from the reproductive factors described above: Late age of first reproduction, small average litter size, and the long interval between litters.... Given the above factors, it may take a female grizzly bear 10 or more years to replace herself in a population. Grizzly bear females cease reproducing some time in their mid-to-late 20s. Doesn't this indicate that if you allow hunting of the Grizzly, it would become necessary down the road to institute a protected status again? Additionally, to further quote your Proposed Rule, "For grizzly bear populations, lambda estimates the average rate of annual growth, with a value of 1.0 indicating a stable population trend with no net growth or decline," if the lambda is stable, wouldn't allowing hunting begin to reduce the population to a negative lambda? Why promote hunting a species that has been designated at risk of extinction not so long ago. Can we not allow the stability to continue? And again from your Proposed Rule: "For long-lived mammals such as grizzly bears, extensive data collected over decades are needed to understand if and how these factors are operating in a population. We have these data for the GYE grizzly bear population, and the IGBST has been able to tease apart some of these confounding effects to find that density-dependent effects are the likely cause of the recent slow in population growth (see Changes in Food Resources under Factor E, below, for more detailed information)." If the population growth is slowing, let's not impose further growth reduction through hunting. Your report indicates: "Grizzly bears are a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality and the manageable nature of this threat." Let's continue to protect, not weed out through hunting permits. I don't have a problem with management removals, but I don't trust that hunting can be well-regulated. The purpose of hunting Grizzlies would be for trophies, not food. This is not a good use of management techniques. Controlling human interaction with the Grizzly population is a more suitable management procedure. Hunting is the worst possible approach. Please do not allow hunting of the Grizzly. Please. Chesa Keane	FWS-R6-ES-2016-0042-2469
Acknowledging that precise calculations are not always possible in the conservation and ecology oriented applied sciences, a problem develops. New factors, such as global warming, gene pool isolation and increased concentrations of chemical residues in soils have rendered the previous calculations obsolete or incorrect. The fish and wildlife service must, as a matter of public trust, err on the side of caution and not remove the grizzly bears from the endangered species act. Their reproduction rate is lower than any North American mammal. Delisting and allowing hunting could	Population parameters	Don't delist the Yellowstone grizzly bears. Acknowledging that precise calculations are not always possible in the conservation and ecology oriented applied sciences, a problem develops. New factors, such as global warming, gene pool isolation and increased concentrations of chemical residues in soils have rendered the previous calculations obsolete or incorrect. The fish and wildlife service must, as a matter of public trust, err on the side of caution and not remove the grizzly bears from the endangered species act. Their reproduction rate is lower than any North American mammal. Delisting and allowing hunting could lead to their demise in only a few short years. Do NOT delist the grizzly bears!	FWS-R6-ES-2016-0042-3457
The population may be doing well now, however if removed from the list, hunting would quickly place them back on the list. It could also tip the scale in favor of this species ending up being lost forever. This is a small population, genetically isolated.	Population parameters	Please do not remove the Grizzly from the protected species list. The population may be doing well now, however if removed from the list, hunting would quickly place them back on the list. It could also tip the scale in favor of this species ending up being lost forever. This is a small population, genetically isolated. These two facts favor an outcome that is poor if hunting is allowed.	FWS-R6-ES-2016-0042-3858

Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Another natural curb in their number.	Population parameters	I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters. Yellowstone was almost destroyed with this insane and uneducated war on wolves and now (do we learn nothing??) the same is happening with the Grizzly Bears. It is mind boggling. Please consider that: Everything in your power should be done to protect this amazing mammal. FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Declining food sources pose a threat to Grizzlies and this delisting will be devastating to the Grizzly's chance of survival.. Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Another natural curb in their number. Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains Grizzlies occupy only 1% of their historic range. AND PLEASE TAKE NOTE: Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years, caused by ignorant planning by humans, by the way.. Hoping for some forward thinking and moral courage here! Thank you Anne K	FWS-R6-ES-2016-0042-3905
Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains	Population parameters	I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters. Yellowstone was almost destroyed with this insane and uneducated war on wolves and now (do we learn nothing??) the same is happening with the Grizzly Bears. It is mind boggling. Please consider that: Everything in your power should be done to protect this amazing mammal. FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Declining food sources pose a threat to Grizzlies and this delisting will be devastating to the Grizzly's chance of survival.. Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Another natural curb in their number. Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains Grizzlies occupy only 1% of their historic range. AND PLEASE TAKE NOTE: Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years, caused by ignorant planning by humans, by the way.. Hoping for some forward thinking and moral courage here! Thank you Anne K	FWS-R6-ES-2016-0042-3905
There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor.	Population parameters	I strongly oppose the delisting of Grizzly Bears on the following grounds: The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. If this was an ungulate population, you would not delist them and turn them over to be hunted at this population level, despite their much faster reproductive rate. Indeed, Alaska is continuing to kill wolves as part of "a long-standing management program aimed at increasing the Fortymile caribou herd." A herd which is currently estimated at over 50,000 caribou! Do not give in to those who would see these important bears as nothing more than a threat to their livestock, or a trophy to be gunned down. Allow science, not political pandering, to be the measuring stick of true recovery.	FWS-R6-ES-2016-0042-0065
But current plans to delist grizzlies fail to recognize continued threats to what remains a small, fragile population. Crucial food sources have been lost to climate change, putting the bears under stress. Fewer cubs are living to adulthood. Human-bear encounters are increasing as bears range further in search of food, placing the bears in lethal peril. Even with ESA protections, the grizzly population has been static for over a decade. Without those protections, experts project that grizzly numbers will fall.	Population parameters	See Attached Attachments Regele Susan	FWS-R6-ES-2016-0042-3272
The population is just a rough estimate and still incredibly low and stagnant in growth at this point. Conditions will likely only get worse for the bears with natural environmental issues and with more and more encroachment by man taking away habitat and food sources	Population parameters	Please do not delist grizzly bears from the endangered and threatened species list. The population is just a rough estimate and still incredibly low and stagnant in growth at this point. Conditions will likely only get worse for the bears with natural environmental issues and with more and more encroachment by man taking away habitat and food sources. Please do not let farming interest groups continue to dictate protection of our remaining grizzlies. Thank you for your consideration.	FWS-R6-ES-2016-0042-0020
I oppose the delisting of GYE Grizzlies; of all the reproductive cycles of large mammals of this continent, theirs is the slowest- approximately 10 years for a healthy breeding sow to reproduce herself in a guild of niches;	Population parameters	I oppose the delisting of GYE Grizzlies; of all the reproductive cycles of large mammals of this continent, theirs is the slowest- approximately 10 years for a healthy breeding sow to reproduce herself in a guild of niches; as climate conditions change and all interdependent species adjust, the stability of the network will be tested; to err on the side of caution is only prudent. Please reject the politicised/ uninformed directives of those who put personal or monetary concern above protecting the long term viability of one of the few remaining relatively intact ecosystems in our nation.	FWS-R6-ES-2016-0042-0028
They reproduce very slowly and are still struggling to reach a stable population. This unusual winter was particularly hard on them.	Population parameters	The delisting of Grizzly Bears is premature. They reproduce very slowly and are still struggling to reach a stable population. This unusual winter was particularly hard on them. These magnificent creatures must be cherished, not hunted as trophies. Their population will soon be decimated. Many are already lost to illegal poaching. They have a very hard time surviving on their own without the addition of being killed as trophies. Please reconsider, and Do Not delist Grizzly Bears.	FWS-R6-ES-2016-0042-0026
Bison, wolf and grizzlie populations are slow to rebound and are no where near carrying capacity in their historic ranges yet.	Population parameters	Delisting = death Letting states "manage" our national wildlife is a sure death sentence. Just look at Wyoming and Montana with their management of bison and wolves - all to appease the livestock industry with their unproven, not-science-based accusations and to add money to the dwindling wildlife management coffers. Bison, wolf and grizzlie populations are slow to rebound and are no where near carrying capacity in their historic ranges yet. Say NO to delisting NOW.	FWS-R6-ES-2016-0042-0061
Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability	Population parameters	I OPPOSE the delisting of the magnificent Yellowstone Grizzlies! Poaching of the grizzlies will occur. Grizzlies are sentient animals. Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Much of the grizzlies natural bounty has gone away. Combined with drought, predation by recently introduced non-native lake trout has nearly removed cutthroat trout in Yellowstone Lake. Whitebark pines have been removed by the spread of a non-native fungal disease and by a climate-driven outbreak of bark beetles. Grizzly bears have one of the lowest reproductive rates of any terrestrial mammal. Grizzly bears also have difficulty colonizing new habitats, primarily because female grizzlies tend to stay in or near their mother's range. Grizzly bears in Yellowstone's mountainous and forested wilderness are hard to count, whether live or dead. Research has shown that the methods used by the USFWS are not only unreliable, but also generate false results that increase the likelihood that the USFWS will erroneously conclude that the population has grown. If delisting were to occur, land managers would be freer to manage to the detriment of grizzlies, sport hunting would be renewed. Given the severity of threats facing Yellowstone's grizzly bears, it makes no sense to delist the population, renew sport hunting, and lessen habitat protections. State and federal agencies have exhibited a disrespectful and dismissive attitude toward the Indian Tribes. The IGBC, comprised of land and wildlife managers from jurisdictions containing grizzlies, has completely ignored the concerns of its tribal members.	FWS-R6-ES-2016-0042-0038

2) the post-delisting habitat protections and mortality limits required by FWS in the proposed rule will not provide for long-term recovery of the grizzly bear;	Population parameters	Thank you for the opportunity to comment on the proposed rule to remove the Greater Yellowstone Ecosystem (GYE) population of grizzly bears from Endangered Species Act (ESA) protections. Defenders of Wildlife (Defenders) is a national non-profit conservation organization founded in 1947 focused on conserving and restoring native species and the habitat upon which they depend. We submit the following comments on behalf of our more than 1.2 million members and supporters nationwide. Over the last two decades, Defenders has played an important role in the recovery of grizzly bears in the northern Rockies. Recognizing that the largest threat facing long term grizzly bear recovery is human related mortalities, Defenders has focused heavily on minimizing conflicts between bears and people through our grizzly bear coexistence program. Since 1997, we have invested more than \$1,000,000 in over 300 on-the-ground projects in the states of Montana, Idaho and Wyoming. Additionally, since 1997 Defenders has reimbursed livestock owners in Montana and Idaho more than \$423,000 for livestock losses due to grizzly bears (Wyoming has a state run program). Defenders pays full market value for livestock verified to have been killed by a grizzly bear and 50% for livestock deemed "probably" killed by a grizzly bear. In 2013, the Montana Livestock Loss Board added grizzly bears to its compensation and conflict prevention program, to which we contributed \$25,000 in startup funding. Defenders continues to pay compensation in Idaho where a state-run program does not yet exist. Defenders is committed to the recovery of grizzly bears both on the ground and at the policy level. Our policy work has included, but has not been limited to: Defenders' significant role in the late 1990s assisting the FWS with a proposal to reintroduce grizzly bears into the Bitterroot. Defenders' Federal Lands program working tirelessly addressing forest policy changes that impact grizzly bears and we continue to fight state and federal legislation that may endanger or undermine grizzly bear recovery. Defenders opposes the U.S. Fish and Wildlife Service's (FWS) proposed rule to remove the GYE grizzly bear population from ESA protections for the following reasons, which we explain in detail below: 1) FWS's proposed rule relies on an assumption that state and other federal agencies will provide adequate regulatory mechanisms to protect the grizzly bear post-delisting, even though those regulatory mechanisms do not currently exist and are certainly not enforceable; 2) the post-delisting habitat protections and mortality limits required by FWS in the proposed rule will not provide for long-term recovery of the grizzly bear; and 3) numerous and significant inconsistencies currently exist between the proposed rule, the recovery plan, and the conservation strategy that undermine FWS's assumptions about the level of protection that would be in place post delisting and make it difficult to assess how much protection the rule would actually provide. We have attached our complete comments and associated appendices. Thank you for this opportunity to comment. Attachments 160510 FINAL to the FWS_Proposed Yellowstone Grizzly Delisting Greater Yellowstone Coalition GYE Griz Prop Zones 2 3 130620_DOW to FWS_Griz RP Dem Criteria	FWS-R6-ES-2016-0042-5018
I fully support the removal of the Greater Yellowstone ecosystem population of grizzly bears from the federal list of endangered and threatened wildlife. We must have science-based conservation, and the science has shown this population is recovered and the ecosystem is at carrying capacity. The recovery of this bear has been a huge success. The predetermined Recovery Criterion has been met and everything has been in the 1950s, a moratorium was placed on hunting black bears in Maryland because the numbers had dropped so precipitously. For decades, no bears were harvested. When the population recovered in the mid-1990s, the Maryland General Assembly re-instituted a limited hunt. There are now an estimated 300 to 400 black bears in Maryland... more than when George Washington first surveyed the state. This number of 300 to 400 bears is the carrying capacity of the habitat in Western Maryland. Any more bears and they start to die off in numbers and the health of the population is reduced. Every year a limited number of hunters, chosen by lottery for which a	Population parameters	I fully support the removal of the Greater Yellowstone ecosystem population of grizzly bears from the federal list of endangered and threatened wildlife. We must have science-based conservation, and the science has shown this population is recovered and the ecosystem is at carrying capacity. The recovery of this bear has been a huge success. The predetermined Recovery Criterion has been met and everything has been done to justify a delisting of this bear. It is time the state manages the species for sustainability.	FWS-R6-ES-2016-0042-0055
More time is needed to prove that normal mortality and accidental and human encounter deaths are not significant risks to the current population. Because the breeding habits of the bear make population changes slow, an error in delisting now could put the whole recovery at risk. I cost little to wait for evidence of claimed stability.	Population parameters	In the 1950s, a moratorium was placed on hunting black bears in Maryland because the numbers had dropped so precipitously. For decades, no bears were harvested. When the population recovered in the mid-1990s, the Maryland General Assembly re-instituted a limited hunt. There are now an estimated 300 to 400 black bears in Maryland... more than when George Washington first surveyed the state. This number of 300 to 400 bears is the carrying capacity of the habitat in Western Maryland. Any more bears and they start to die off in numbers and the health of the population is reduced. Every year a limited number of hunters, chosen by lottery for which a \$15.00 fee is charged and used to further improve bear habitat, harvest approximately 35 to 40 bears. The reduction in numbers each year is offset by recruitment in the following year, as the habitat in Western Maryland is conducive to sows giving birth to two and three cubs each year. As this example demonstrates, game management when done right works. As a result, I wholeheartedly concur with the USFWS decision to delist the GYE brown bear population (Ursus arctos horribilis) from the endangered species list and allow the states to manage the population through regulated hunts.	FWS-R6-ES-2016-0042-0063
Once a quota of sow grizzlies has been reached, all grizzly hunting should be ended for the season. The goal should be to carefully manage the population while ensuring slow, steady growth in the number of bears. Relocation should also be considered as a management tool before opting for hunting.	Population parameters	I do not believe the grizzly bear recovery is a confirmed event. Yes, the bear numbers are up, but I do not believe stability has been confirmed. More time is needed to prove that normal mortality and accidental and human encounter deaths are not significant risks to the current population. Because the breeding habits of the bear make population changes slow, an error in delisting now could put the whole recovery at risk. I cost little to wait for evidence of claimed stability.	FWS-R6-ES-2016-0042-0102
A healthy manageable population needs to be maintained. Let science and common sense management provide for the best healthiest management over emotion and irrational fears.	Population parameters	I've bow hunted in grizzly country in Idaho outside of Yellowstone Park for several years. While we have found tracks, scat and, one one occasion, had a bear come between me and an elk, I've never found grizzly numbers to be so significant that they have posed a real risk. If there is to be a hunting season, it should be very carefully monitored, with limited, controlled hunt tags and mandatory reporting by all hunters who participate. Once a quota of sow grizzlies has been reached, all grizzly hunting should be ended for the season. The goal should be to carefully manage the population while ensuring slow, steady growth in the number of bears. Relocation should also be considered as a management tool before opting for hunting.	FWS-R6-ES-2016-0042-0124
History has shown us through the protection of bears, wolves, and lions in various states, that, when endangered animals, especially carnivores, exceed their carrying capacity, they will cause problems/ conflicts with domestic animals as well as humans.	Population parameters	I fully support delisting Grizzlies in the lower 48. A healthy manageable population needs to be maintained. Let science and common sense management provide for the best healthiest management over emotion and irrational fears. The more this species grows in habitat range the more conflict and issues we'll see. Also with less natural habitat as younger bears will be pushed out or killed by older bears due to lack of habitat. An ecosystem can only hold so many bears before we see a collapse of the system. We only have so much habitat that the Grizzly will never return to the number of black bears purely based on less habitat. Please delist and provide sound management so that they can thrive in the little remaining habitat left.	FWS-R6-ES-2016-0042-0157
Female bears if healthy only have litters about every 3 years and do not reproduce easily.	Population parameters	I support the delisting of grizzly bears in the GYA. Wild animals should be managed by the states in which they reside, and scientifically so. History has shown us through the protection of bears, wolves, and lions in various states, that, when endangered animals, especially carnivores, exceed their carrying capacity, they will cause problems/ conflicts with domestic animals as well as humans. The North American Model of wildlife management has been proven to work.	FWS-R6-ES-2016-0042-0158
Please consider their low birthing rates and birth to adult rates	Population parameters	To Secretary of the Interior Ms. Sally Jewell, I am writing to you about the issue of the U.S. Fish and Game Department's decision to remove the Yellowstone Grizzly Bear aka Brown Bear off the Federal Endangered Species Protection list. This is a complex issue as are the consequences of this amazing animal losing their endangered protection. The final answer as to why the Yellowstone Grizzly should not be removed is clearly because the species is not recovered. Instead of delisting, with all the time, money, and effort spent to bring back the bear from extinction, more money and time needs to be spent educating the growing human population on living in bear territory. Currently, the #1 cause of bear mortality still stems from conflicts with people. A secondary unforeseen problem that has reared its ugly head in recent years is the misinformation campaign of certain US agencies as well as one sided mainstream media stories. For example, government agencies and U.S. newspaper articles have claimed that the Yellowstone Bear population has increased and even doubled since the last time the US Fish and Game tried to remove the bear in 2006. In dissent of this opinion, a recent annual report compiled by Dr. David Mattson from the Interagency Grizzly Bear Study Team concludes that the Yellowstone Grizzly population has not only not grown since 2002, it has actually declined since 2007. This effort to misinform the public is both disturbing and problematic because the American people are not getting the truth. Let it be known that I wish to only focus on a few important points in this letter as opposed to the many reasons as to why delisting the Yellowstone Bear is the wrong move at this time. Female bears if healthy only have litters about every 3 years and do not reproduce easily. The Yellowstone Bear population has been isolated for over 100 years and some evidence suggests that the population is suffering from the effects of inbreeding. The Brown Bear currently occupies about 1% of their historic range prior to Europeans settling the United States. While there is available habitat suitable for Brown Bears that could be used to connect the few remaining populations in the lower 48 states, the current plan calls for flying or driving male brown bears to Yellowstone in order to mate and improve their genetic diversity. Again, this is a wrong-headed move unless given no other choice to sustain a healthy population. Currently, ranchers and farmers are compensated for the loss of domesticated animals by Yellowstone Bears. While some ranchers are working out their differences peacefully with grizzly bears, others are not. For that reason, federal oversight is still necessary. The issue of climate change as it relates to the loss of the bear's food sources must also be addressed. U.S. Fish and Wildlife Service has claimed that it's OK to delist the Grizzly now, even though it has lost 2 of their 4 major food sources because of climate change and invasive species. Warming temperatures are expected to remove the summer alpine haunts of one of the other remaining key foods: army cutworm moths. In the face of an unraveling ecosystem, bears have been turning to the dangerous practice of eating more meat. Unsustainable numbers of bears are being killed as result of conflicts with incautious big game hunters and ranchers. More needs to be done to reduce conflicts, not less. Lastly, another consequence of delisting the brown bear is that they will once again be hunted. States surrounding Yellowstone have already announced the bear will once again be hunted. Hunting the bear is exactly what caused the Yellowstone Bear to need FESP in the 1st place. While most people would rather take a photograph of a bear as opposed to shooting it, trophy hunting brown bears translates to state hunting license revenues. Grizzly Bear hunts will negatively impact this un-recovered species. Hopefully, the Yellowstone Grizzly can one day be delisted for the right reasons. However, removal at this time would most definitely jeopardize the Brown Bear's health and survival. Respectfully, Jack Locker	FWS-R6-ES-2016-0042-0008
	Population parameters	Please do not delist grizzlies. There is not enough already. Please consider their low birthing rates and birth to adult rates	FWS-R6-ES-2016-0042-0276

The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies.	Population parameters	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266
Yellowstones population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger.	Population parameters	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstones population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the ecosystem is full or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before discretionary (hunting, management removals etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the states current management plan) i.e. Wyoming Range, southern Winds, Salt River Range TO CONCLUDE: - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? - Bears are facing an uncertain future. Last year alone 43 bears were killed in conflicts, most of which were food related deaths. _____	FWS-R6-ES-2016-0042-0286
Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions.	Population parameters	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstones population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the ecosystem is full or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before discretionary (hunting, management removals etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the states current management plan) i.e. Wyoming Range, southern Winds, Salt River Range TO CONCLUDE: - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? - Bears are facing an uncertain future. Last year alone 43 bears were killed in conflicts, most of which were food related deaths. _____	FWS-R6-ES-2016-0042-0286
Please keep Grizzly Bears on the endangered list as long as there remains a question about the long-term prospects of these iconic Western creatures. That the grizzly population is heavy on older bears while young bears are not surviving to adulthood (Bonnie Rice, Sierra Club) is evidence of a troubling trend. Perhaps states could be given authority to deal with	Population parameters	See Attached Attachments James Darcy	FWS-R6-ES-2016-0042-0002
Population could be reduced to 600 bears (500 bears in Wyoming) before discretionary (hunting, management removals etc.) mortality would be curtailed.	Population parameters	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstones population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the ecosystem is full or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before discretionary (hunting, management removals etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the states current management plan) i.e. Wyoming Range, southern Winds, Salt River Range TO CONCLUDE: - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? - Bears are facing an uncertain future. Last year alone 43 bears were killed in conflicts, most of which were food related deaths. _____	FWS-R6-ES-2016-0042-0286

my conclusion that there is on biological evidence to support the belief that they should be delisted. Here's why:1) They need biological diversity. With hunting, they will be unable to reach other grizzly bear populations. 2) Some of their primary food sources are in decline due to global warming. This is an indisputable fact. 3) They have the lowest reproduction rate of any North American animal. If hunted, their numbers could be driven down past the point of recovery, because there is no reliable way to count them, especially by gender. Sows will be killed and cubs left to starve or be killed by predators or hunters. 4) They are an important factor in the Yellowstone ecosystem. To remove any of them would be a disservice! Additionally, grizzly bears bring thousands, if not millions, of people to Yellowstone each year. There is no reason why we can't live with the grizzly bears. People need to be responsible, so bears don't have to be killed or removed from the Greater Yellowstone Ecosystem. Over 50 were removed in 2015, mostly	Population parameters	I have read numerous opinions on the subject of delisting the grizzly bears. My conclusion that there is on biological evidence to support the belief that they should be delisted. Here's why: 1) They need biological diversity. With hunting, they will be unable to reach other grizzly bear populations. 2) Some of their primary food sources are in decline due to global warming. This is an indisputable fact. 3) They have the lowest reproduction rate of any North American animal. If hunted, their numbers could be driven down past the point of recovery, because there is no reliable way to count them, especially by gender. Sows will be killed and cubs left to starve or be killed by predators or hunters. 4) They are an important factor in the Yellowstone ecosystem. To remove any of them would be a disservice! Additionally, grizzly bears bring thousands, if not millions, of people to Yellowstone each year. There is no reason why we can't live with the grizzly bears. People need to be responsible, so bears don't have to be killed or removed from the Greater Yellowstone Ecosystem. Over 50 were removed in 2015, mostly due to human negligence, even with protection. Without protection it would be a fiasco. Greed and the desire to mount a grizzly bear head on the wall is what I believe, is driving this decision to delist them. It has nothing to do with conservation. Turning the fate of the grizzly bear over to anti-carnivore states would be a disaster that could result in the demise of the grizzly bear. Many of these bears, especially sows with cubs have grown accustomed to humans and would be easy targets for hunters. Allowing hunting in areas close to Yellowstone and Grand Teton parks would be a complete disaster and some of the states are even talking about allowing that. Some hunters are already targeting particular bears as soon as they are delisted. Please withdraw your request to delist the grizzly bears. These bears are an important part of the ecosystem and are loved by people who come to visit the area. We live in Montana and I know we can find a way to live with the grizzlies. We don't need to kill them.	FWS-R6-ES-2016-0042-0306
Grizzly bears do not reproduce quickly, so any assault on their tenuous population could very well result in total extinction.	Population parameters	I respectfully urge you to not remove grizzly bears from the Endangered Species List. Trophy hunting is not the answer to management. These magnificent icons of American wilderness have recovered to less than 10% of their original habitat - how can that be considered recovered? Grizzly bears do not reproduce quickly, so any assault on their tenuous population could very well result in total extinction. These highly intelligent, sentient beings deserve better. They are apex predators that have a huge impact on a healthy ecosystem. Viewing live grizzlies is an economic boon to areas that are lucky enough to have them. Allowing trophy hunting will take these viewing opportunities away. A trophy hunter killing a grizzly takes away from everyone the opportunity to see that grizzly ever again. A person who instead views live grizzlies, not only stimulates the local economy, but perpetuates that opportunity for others to have the same viewing experience - in my mind, it should be a no-brainer on what is the morally, ethically, and economically correct thing to do. Please don't cave to the extreme, anti-wildlife special interest groups. The majority of Americans do not want grizzly bears de-listed. In a democratic society, the majority should rule, and in this case the majority would like to see the grizzly bear protected.	FWS-R6-ES-2016-0042-0315
Population growth has stagnated since the early 2000's and has even been in decline in recent years. Most recently in fact, the Yellowstone grizzly population declined by 43 bears in 2015 alone, representing a massive 6% population decline in a single year. The USFWS has argued that the population growth has stagnated because the population has reached carrying capacity. In reality, what's happened is the bears major food sources are in a state of disaster and more bears are roaming more widely in search of different foods and getting killed by humans in the process.	Population parameters	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266
The current populations are being managed for stability, not growth. There is no significant increase in grizzly populations. Reinstating any kind of hunt prematurely on this species risks a decline in numbers that most likely will exceed reproduction rates.	Population parameters	I OPPOSE the delisting of Grizzly Bears on the following grounds: 1) The current populations are being managed for stability, not growth. There is no significant increase in grizzly populations. Reinstating any kind of hunt prematurely on this species risks a decline in numbers that most likely will exceed reproduction rates. 2) Questionable science as to "Carrying Capacity". Rather than reaching carrying capacity, the decline in primary food sources due to climate change, non native fish, and heavy pesticide use; are forcing bears to search further for their food including cutthroat trout, especially Whitebark Pine nuts and army cutworm moths. 3) Without federal protections, grizzlies would not be able to reach further vital food sources in Wyoming. 4) The Grizzly bear species are the slowest reproducing mammals in North America. Reproducing every 3 years and at best, will duplicate herself in a 10-year period 5) Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions. 6) The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray wolves) 7) Genetic Connectivity is vital to the long term survival of the species. The population/gene-pool is too isolated prohibiting genetic diversity within the species. For long term survival the grizzly needs protected corridors to reach other regions to expand the gene pool. 8) Even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. 9) It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. 10) The Yellowstone grizzly population faces enormous threats from increasing regional human populations, energy development, climate change, decline in food sources caused by climate change, habitat degradation caused by climate warming, problematic livestock husbandry practices, hostile state management, and unreliable methods for monitoring status and trends. 11) Compared to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of aggressive state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. 12) And, without doubt, colonization of new ranges will be the first casualty of state management. Populations will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range. I come to Yellowstone every year to view the wildlife. I don't understand with all the scientific evidence NOT TO DELIST, that you have to put a so called "management plan" in effect just to allow the grizzlies to be trophy hunted. Taking them off the Endangered Species Act has nothing to do with allowing the states to hunt and kill them to be made into rugs or head mounts.	FWS-R6-ES-2016-0042-0332
The Grizzly bear species are the slowest reproducing mammals in North America. Reproducing every 3 years and at best, will duplicate herself in a 10-year period	Population parameters	I OPPOSE the delisting of Grizzly Bears on the following grounds: 1) The current populations are being managed for stability, not growth. There is no significant increase in grizzly populations. Reinstating any kind of hunt prematurely on this species risks a decline in numbers that most likely will exceed reproduction rates. 2) Questionable science as to "Carrying Capacity". Rather than reaching carrying capacity, the decline in primary food sources due to climate change, non native fish, and heavy pesticide use; are forcing bears to search further for their food including cutthroat trout, especially Whitebark Pine nuts and army cutworm moths. 3) Without federal protections, grizzlies would not be able to reach further vital food sources in Wyoming. 4) The Grizzly bear species are the slowest reproducing mammals in North America. Reproducing every 3 years and at best, will duplicate herself in a 10-year period 5) Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions. 6) The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray wolves) 7) Genetic Connectivity is vital to the long term survival of the species. The population/gene-pool is too isolated prohibiting genetic diversity within the species. For long term survival the grizzly needs protected corridors to reach other regions to expand the gene pool. 8) Even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. 9) It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. 10) The Yellowstone grizzly population faces enormous threats from increasing regional human populations, energy development, climate change, decline in food sources caused by climate change, habitat degradation caused by climate warming, problematic livestock husbandry practices, hostile state management, and unreliable methods for monitoring status and trends. 11) Compared to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of aggressive state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. 12) And, without doubt, colonization of new ranges will be the first casualty of state management. Populations will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range. I come to Yellowstone every year to view the wildlife. I don't understand with all the scientific evidence NOT TO DELIST, that you have to put a so called "management plan" in effect just to allow the grizzlies to be trophy hunted. Taking them off the Endangered Species Act has nothing to do with allowing the states to hunt and kill them to be made into rugs or head mounts.	FWS-R6-ES-2016-0042-0332

Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions.	Population parameters	I OPPOSE the delisting of Grizzly Bears on the following grounds: 1) The current populations are being managed for stability, not growth. There is no significant increase in grizzly populations. Reinstating any kind of hunt prematurely on this species risks a decline in numbers that most likely will exceed reproduction rates. 2) Questionable science as to "Carrying Capacity". Rather than reaching carrying capacity, the decline in primary food sources due to climate change, non native fish, and heavy pesticide use; are forcing bears to search further for their food including cutthroat trout, especially Whitebark Pine nuts and army cutworm moths. 3) Without federal protections, grizzlies would not be able to reach further vital food sources in Wyoming. 4) The Grizzly bear species are the slowest reproducing mammals in North America. Reproducing every 3 years and at best, will duplicate herself in a 10-year period 5) Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions. 6) The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray wolves) 7) Genetic Connectivity is vital to the long term survival of the species. The population/gene-pool is too isolated prohibiting genetic diversity within the species. For long term survival the grizzly needs protected corridors to reach other regions to expand the gene pool. 8) Even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. 9) It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. 10) The Yellowstone grizzly population faces enormous threats from increasing regional human populations, energy development, climate change, decline in food sources caused by climate change, habitat degradation caused by climate warming, problematic livestock husbandry practices, hostile state management, and unreliable methods for monitoring status and trends. 11) Compared to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of aggressive state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. 12) And, without doubt, colonization of new ranges will be the first casualty of state management. Populations will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range. I come to Yellowstone every year to view the wildlife. I don't understand with all the scientific evidence NOT TO DELIST, that you have to put a so called "management plan" in effect just to allow the grizzlies to be trophy hunted. Taking them off the Endangered Species Act has nothing to do with allowing the states to hunt and kill them to be made into rugs or head mounts.	FWS-R6-ES-2016-0042-0332
Genetic Connectivity is vital to the long term survival of the species. The population/gene-pool is too isolated prohibiting genetic diversity within the species. For long term survival the grizzly needs protected corridors to reach other regions to expand the gene pool.	Population parameters	I OPPOSE the delisting of Grizzly Bears on the following grounds: 1) The current populations are being managed for stability, not growth. There is no significant increase in grizzly populations. Reinstating any kind of hunt prematurely on this species risks a decline in numbers that most likely will exceed reproduction rates. 2) Questionable science as to "Carrying Capacity". Rather than reaching carrying capacity, the decline in primary food sources due to climate change, non native fish, and heavy pesticide use; are forcing bears to search further for their food including cutthroat trout, especially Whitebark Pine nuts and army cutworm moths. 3) Without federal protections, grizzlies would not be able to reach further vital food sources in Wyoming. 4) The Grizzly bear species are the slowest reproducing mammals in North America. Reproducing every 3 years and at best, will duplicate herself in a 10-year period 5) Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions. 6) The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray wolves) 7) Genetic Connectivity is vital to the long term survival of the species. The population/gene-pool is too isolated prohibiting genetic diversity within the species. For long term survival the grizzly needs protected corridors to reach other regions to expand the gene pool. 8) Even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. 9) It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. 10) The Yellowstone grizzly population faces enormous threats from increasing regional human populations, energy development, climate change, decline in food sources caused by climate change, habitat degradation caused by climate warming, problematic livestock husbandry practices, hostile state management, and unreliable methods for monitoring status and trends. 11) Compared to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of aggressive state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. 12) And, without doubt, colonization of new ranges will be the first casualty of state management. Populations will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range. I come to Yellowstone every year to view the wildlife. I don't understand with all the scientific evidence NOT TO DELIST, that you have to put a so called "management plan" in effect just to allow the grizzlies to be trophy hunted. Taking them off the Endangered Species Act has nothing to do with allowing the states to hunt and kill them to be made into rugs or head mounts.	FWS-R6-ES-2016-0042-0332
In the last 40 years millions of dollars have been spent to bring the Grizzly population from 125 to 725. 40 years is an awful long time to just raise the population by that little of amount.	Population parameters	I am 100% against delisting Grizzly Bears. In the last 40 years millions of dollars have been spent to bring the Grizzly population from 125 to 725. 40 years is an awful long time to just raise the population by that little of amount. It would be a shame to undo that little bit of progress, just to appease trophy hunters looking for a photo-op, killing a bear for no other reason than recreation. Its the same story with wolves, being killed for photo-ops, and recreation, and it is wrong. Wolves and bears bring in millions of tourist dollars every year. It is time to end catering to trophy-recreation hunters.	FWS-R6-ES-2016-0042-0338
Grizzlies are the slowest reproducing mammal in the world	Population parameters	I am against the delisting of grizzly bears. Grizzlies are the slowest reproducing mammal in the world. 40 years and millions of dollars were spent to recover them from a little over hundred to just over 700. That took 40 YEARS!! Why so quick to delist? What is the point of recovery if you turn around and kill without letting the effects of recovery sink in for 10 years or so? And with climate change happening, you haven't given them a fair chance. Predators are essential in the circle of life...you take them away and the ecosystem crumbles downward. Hunting predators is counterproductive and foolish. I am strongly against the delisting. This decision is wrong and does not listen follow what science says. Keep Grizzly Bears Listed!! Thank you	FWS-R6-ES-2016-0042-0336
In the year of 2015, there were 64 Grizzlies known and estimated unknown/unreported mortalities in the demographic monitoring area in the Greater Yellowstone Ecosystem. This includes natural mortalities as well. This is the highest annual mortality total documented to date. How do we know more Grizzlies were not killed and just never discovered? How do we know that the practice of Shoot, shovel and shut up is not impacting Grizzly populations?	Population parameters	I support keeping the Grizzly Bear listed on the Endangered Species Act (ESA). Yellowstone is a World Heritage Park. The Grizzlies in and around Yellowstone belong not only to Americans but to all around the world. What rights do Montana Governor Bullock and Wyoming Governor Mead have in selling off our iconic Grizzlies to trophy hunters. In the year of 2015, there were 64 Grizzlies known and estimated unknown/unreported mortalities in the demographic monitoring area in the Greater Yellowstone Ecosystem. This includes natural mortalities as well. This is the highest annual mortality total documented to date. How do we know more Grizzlies were not killed and just never discovered? How do we know that the practice of Shoot, shovel and shut up is not impacting Grizzly populations? How do you know how many Grizzlies are really out there? It takes 10 years for a sow to have her first cub/cubs. Will cubs be killed too along with their mother? Young cubs will die without their mother. That would drop the Grizzly population even faster. Grizzly Bears have a large impact on the economy around the Yellowstone Ecosystem. Why would Governors Bullock and Mead want to as the old saying goes " Cut off the hand that feeds you"? These bears help bring in Millions if not Billions of dollars to their states. More money than so called "trophy hunters" ever will. Because once those bears are gone it will take another 40 years if not longer to bring them back depending on how far poachers destroy their numbers. I definitely support keeping all Grizzly Bears on the ESA.	FWS-R6-ES-2016-0042-0344
Young cubs will die without their mother. That would drop the Grizzly population even faster.	Population parameters	I support keeping the Grizzly Bear listed on the Endangered Species Act (ESA). Yellowstone is a World Heritage Park. The Grizzlies in and around Yellowstone belong not only to Americans but to all around the world. What rights do Montana Governor Bullock and Wyoming Governor Mead have in selling off our iconic Grizzlies to trophy hunters. In the year of 2015, there were 64 Grizzlies known and estimated unknown/unreported mortalities in the demographic monitoring area in the Greater Yellowstone Ecosystem. This includes natural mortalities as well. This is the highest annual mortality total documented to date. How do we know more Grizzlies were not killed and just never discovered? How do we know that the practice of Shoot, shovel and shut up is not impacting Grizzly populations? How do you know how many Grizzlies are really out there? It takes 10 years for a sow to have her first cub/cubs. Will cubs be killed too along with their mother? Young cubs will die without their mother. That would drop the Grizzly population even faster. Grizzly Bears have a large impact on the economy around the Yellowstone Ecosystem. Why would Governors Bullock and Mead want to as the old saying goes " Cut off the hand that feeds you"? These bears help bring in Millions if not Billions of dollars to their states. More money than so called "trophy hunters" ever will. Because once those bears are gone it will take another 40 years if not longer to bring them back depending on how far poachers destroy their numbers. I definitely support keeping all Grizzly Bears on the ESA.	FWS-R6-ES-2016-0042-0344

Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. Å	Population parameters	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? - Bears are facing an uncertain future. Last year alone 43 bears were killed in conflicts, most of which were food related deaths.	FWS-R6-ES-2016-0042-0320
Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. Å	Population parameters	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? - Bears are facing an uncertain future. Last year alone 43 bears were killed in conflicts, most of which were food related deaths.	FWS-R6-ES-2016-0042-0320
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They have the lowest reproduction rate of any North American mammal,	Population parameters	Do NOT delist the grizzly bears. They have the lowest reproduction rate of any North American mammal, their food sources are disappearing due to climate change and to the Lake Trout, they need to reach other bear populations for biological diversity, they're important to the Greater Yellowstone ecosystem, to our history and to our culture. I believe this is being fueled by greed and by the desire of some people to have a grizzly bear head as a trophy. Those are not reasons to delist them! Their are sound scientific reason to NOT delist them! Over a million people visit Yellowstone and Grand Teton annually, mostly to see grizzly bears. Don't let the grizzly bears become extinct. If their fate is turned over to the anti-carnivore states of Wyoming, Montana and Idaho this could happen. Wyoming's plan doesn't even allow for a no-hunting corridor around or between the parks. Many bears, mostly sow's with Cubs or older bears who need protection, hang out close to the roads. Without Federal protection these bears will be easy targets for hunters. Some hunters are already targeting specific bears that they intend to kill if they are delisted. Don't let this happen. Look at the statistics. Global warming is real, whatever the cause. It IS effecting the grizzly bear and other animals. That's reason enough not to delist them. We can live with the Bears. People can learn to keep their food inside, to be more careful when they're hiking and to carry bear spray when hiking in grizzly territory. The problems with bears have been caused by humans, not by the Bears! We should be able to deal with it. We're supposed to be the responsible ones. Let's act like it!	FWS-R6-ES-2016-0042-0417
Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed.	Population parameters	The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range This is being considered for the benefit of trophy hunters and is not based on the science above or any consideration for the safety of the grizzly population. I implore you to consider not hunting them because of the reasons listed above and many more.	FWS-R6-ES-2016-0042-0387
I am writing to OPPOSE the delisting of the grizzly bears of the Greater Yellowstone ecosystem. While I am pleased that grizzly numbers have reached a threshold that they are safer from extinction, we have learned all too well that delisting is "code" for "now we can hunt them for fun".The managed hunting of deer, elk and other prey animals is appropriate and within the context of natural ecosystems. The hunting of carnivores, especially apex carnivores like the grizzly bear is not. It is aberrant, and inappropriate and damages wild places.FWS data on Grizzlies do not show increasing populations, they have only just maintained their numbers for the past 15 years. Declining food sources (white pine bark tree nuts,	Population parameters	I am writing to OPPOSE the delisting of the grizzly bears of the Greater Yellowstone ecosystem. While I am pleased that grizzly numbers have reached a threshold that they are safer from extinction, we have learned all too well that delisting is "code" for "now we can hunt them for fun". The managed hunting of deer, elk and other prey animals is appropriate and within the context of natural ecosystems. The hunting of carnivores, especially apex carnivores like the grizzly bear is not. It is aberrant, and inappropriate and damages wild places. FWS data on Grizzlies do not show increasing populations, they have only just maintained their numbers for the past 15 years. Declining food sources (white pine bark tree nuts, cutthroat trout, army cutworm moths) result in bears travelling outside the safety of the park, where they would be hunted. These declining food sources also may threaten the recovery of the bears. We are still at a time in Grizzly recovery where every bear is important. There are still too many concerns about their future well being to delist them.	FWS-R6-ES-2016-0042-0426
Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River RangeThis is being considered for the benefit of trophy hunters and is not based on the science above or any consideration for the safety of the grizzly population.	Population parameters	The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range This is being considered for the benefit of trophy hunters and is not based on the science above or any consideration for the safety of the grizzly population. I implore you to consider not hunting them because of the reasons listed above and many more.	FWS-R6-ES-2016-0042-0387
Because grizzlies are being killed at a rate the slowly-reproducing animals cannot tolerate long-term; since 2002 the population has probably declined	Population parameters	We have lived, worked and recreated in the Greater Yellowstone Ecosystem (GYE) for almost 40 years, meeting working in Yel lowstone National Park. We have explored by foot thousands of miles of trails into some of the most breathtaking landscapes on earth, filled with the suite of native wildlife that we so love and respect. We have seen many grizzly bears over the decades and no animal is more powerful in the public's sensibility than the Great Bear. It is our state animal, picked by Montana school children. Our native tribes greatly value the grizzly bear as do all of us who value our wild places and wildlife. The grizzly bear is greater than life; it represents all that we as a people almost lost and what we have preserved. We value our large predators, our carnivores, because they remind us that we share life together in this time and place. They represent the wilderness we almost lost.We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best: Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data. Because the ecosystem is becoming stressed by climate change causing dramatic changes in food supplies needed. Because all foods are not equal. Because grizzlies are being killed at a rate the slowly-reproducing animals cannot tolerate long-term; since 2002 the population has probably declined Because connectivity with other bears depends upon GYE grizzlies roaming and hunting would preclude that. Because human caused mortality is mostly avoidable and prevention is not stressed enough. Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable. Because sport trophy hunting of grizzly bears would be abhorrent and would reverse recovery. Because tolerant bears that people see around the parks would be the first killed. Because wildlife watchers are ignored by state wildlife agencies and the USFWS. Just look at wolf and bison management. Because tribal interests are ignored by state wildlife agencies. Because wildlife watching brings in far more economically than does hunting in GYE states. Because listing the grizzly as a distinct population segment (DPS) is possibly illegal, because it precludes the bears seeking connectivity. Because the GYE grizzly bear lives on an ecological island. Because politics trumps science every time. We love our grizzly bears and want them protected from nefarious forces bent upon hunting them. USFWS should listen to the public's concerns, listen to opposing scientists and do the right thing. Do not delist the grizzly bear.	FWS-R6-ES-2016-0042-0422

The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. Å	Population parameters	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear.No one knows where the additional monies will come from to pay for implementation of the delisting plan. 8. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. This means that the estimates of current population growth rates in the delisting plan will no longer apply after delisting. 9. The US Fish and Wildlife Service and the State of Wyoming appear to condone Wyoming county laws prohibiting bears within their borders. Four counties in Wyoming have passed laws barring bears within their borders. Recovery goals cannot be achieved if these counties implement their laws as they intend.	FWS-R6-ES-2016-0042-0452
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But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear.No one knows where the additional monies will come from to pay for implementation of the delisting plan. 8. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. This means that the estimates of current population growth rates in the delisting plan will no longer apply after delisting. 9. The US Fish and Wildlife Service and the State of Wyoming appear to condone Wyoming county laws prohibiting bears within their borders. Four counties in Wyoming have passed laws barring bears within their borders. Recovery goals cannot be achieved if these counties implement their laws as they intend. 10. The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population. Research has also shown threshold population effects, which could mean that by the time the problem is detected, it is too late to fix the problem.	FWS-R6-ES-2016-0042-0456
The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural Å recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. Å	Population parameters	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear.No one knows where the additional monies will come from to pay for implementation of the delisting plan. 8. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. This means that the estimates of current population growth rates in the delisting plan will no longer apply after delisting. 9. The US Fish and Wildlife Service and the State of Wyoming appear to condone Wyoming county laws prohibiting bears within their borders. Four counties in Wyoming have passed laws barring bears within their borders. Recovery goals cannot be achieved if these counties implement their laws as they intend.	FWS-R6-ES-2016-0042-0452

The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been.	Population parameters	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are used to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife, primarily grizzlies and wolves. Allowing a "trophy" hunt, targeting the park grizzlies is not only an easy hunt, but not a hunt at all, no less an ambush of the species. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, even resistant to managing a species of high importance to the non-hunting public and/or the federal government (i.e. - Gray wolves). In addition, even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. In comparison to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of aggressive state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. It has taken 40 years of protections to get where we are today, lifting protections prematurely sets great risk and consequence for long term survival of the species; add to that a pending "trophy" hunt will insure the grizzly population to decline back towards extinction within a very short period of time. Finally, tourism to Yellowstone National Park, brings in millions of annually. Delisting the iconic grizzly bear which people come from all over the globe to see, sets a negative tone, dangerous precedence, and puts that tourism in jeopardy. As a professional, as an American citizen and tourist, for all the reasons stated above, I strongly OPPOSE delisting the Yellowstone grizzly. And ask that you stop the process for delisting and continue vital ESA protections for the long term survival of the greatest bear species that exists. Thank you for your time and consideration in this extremely important matter.	FWS-R6-ES-2016-0042-0463
Grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary.	Population parameters	I completely OPPOSE delisting Yellowstone Grizzlies. There is a irrational cultural hostility toward grizzlies in Wyoming, a state where public officials want to suppress recovery, even preventing bears from inhabiting remote federal public lands in the Yellowstone region because priority is given to non-native, taxpayer-subsidized private cattle. Grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between whitebark pine productivity and grizzly bear mortality. Now that whitebark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers is short-sighted and unnecessary.	FWS-R6-ES-2016-0042-5032
I am not for completely getting rid of them, but I feel the population has grown out of control and it has gotten to the point where they are expanding in areas they don't need to be.	Population parameters	I am in support of DE-LISTING the Grizzly Bear. Although I am not a resident of Wyoming I spend time there and I believe their is too many Grizzly Bears than their needs to be. I am not for completely getting rid of them, but I feel the population has grown out of control and it has gotten to the point where they are expanding in areas they don't need to be. I also feel their fear of humans is not where should be because they haven't been hunted in such a long time that it gets them into trouble because of lack of fear. I strongly support conservation and want to see the elk, moose and deer herds thrive in the great state of Wyoming that I love enjoying so much. Please consider de listing the Grizzly Bear. Thank you for your consideration.	FWS-R6-ES-2016-0042-5033
Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting. 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium.	Population Parameters	1. Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population. 2. Grizzly bears are not recovered across their historic range. 3. Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399, would be threatened by the delisting. The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "the reality is that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yaak region." Therefore, the grizzly bear cannot be delisted in just the Great Yellowstone Area. Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting. 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. Finally, I agree with Tom Poor Bear who concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations." Do not delist grizzly bears!	FWS-R6-ES-2016-0042-5023
This year alone there were 62 grizzly deaths with the vast majority being human related. That is close to 7% of the population that they claim lives in the greater Yellowstone area. Out of those deaths where information is provided 15 were listed as females. Bears reproduce at extremely slow rates with female bears reaching sexual maturity around 7 years old. This means the loss of female bears and often times their cubs can dramatically impact the future of the population moving forward.	Population parameters	I strongly oppose the de-listing of the grizzly bear from Federal protections. While the recovery of the grizzly is a great success story there are several factors that make this recovery potentially unstable. This year alone there were 62 grizzly deaths with the vast majority being human related. That is close to 7% of the population that they claim lives in the greater Yellowstone area. Out of those deaths where information is provided 15 were listed as females. Bears reproduce at extremely slow rates with female bears reaching sexual maturity around 7 years old. This means the loss of female bears and often times their cubs can dramatically impact the future of the population moving forward. Several environmental changes are also having harsh impacts on the bears food supplies which will undoubtedly add extra pressures on the population. Grizzlies are the last of the great apex predators living in the lower 48 and we all should do what we can to preserve their legacy.	FWS-R6-ES-2016-0042-0485
Grizzlies are key predators who aid in the critical 'trophic cascades' that encourage indigenous plant life and river health in the National Parks. These iconic mammals are still in danger with their numbers not being substantial; and the health of cubs who are not thriving and surviving, making their future uncertain.	Population Parameters	Grizzlies are key predators who aid in the critical 'trophic cascades' that encourage indigenous plant life and river health in the National Parks. These iconic mammals are still in danger with their numbers not being substantial; and the health of cubs who are not thriving and surviving, making their future uncertain. Disturbing images such as a viral video of cruel truck drivers chasing a Grizzly bear indicate that animal abusers are waiting to trap and bear bait these poor creatures. In no time their numbers will dwindle to nothing again. Bringing a species back from the verge of extinction takes time and delisting the Grizzly at this time, is too soon to give them a real chance to recover. DO NOT DELIST the Yellowstone Grizzly bears and doom them to the mercy of unscrupulous trophy hunters. Just like Cecil the Lino, these gorgeous and iconic bears deserve a chance to co-exist and find balance for their population in the future. Thank you!	FWS-R6-ES-2016-0042-0499

The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management.	Population parameters	As a wildlife biologist and a very frequent visitor to the National Park System, especially of Yellowstone, Grand Teton and Glacier National Parks, I am absolutely appalled at the great risks taken in the proposal to delist Yellowstone Grizzly Bears. The current populations of grizzlies are currently managed for stability, not for growth. By the USFWS own data, the species shows no significant increase in numbers since 2000. Embedded in the "stable" population level, an increase in mortality due to deterioration of habitat due largely to climate change, as well as human caused death is balancing any reproductive effects there have been. Currently, grizzlies already face enormous threats from several directions including increased human interference regionally, from climate change and effects on food source and habitat, from nearby energy development, local practices of problematic livestock husbandry, there is hostile state management in the applicable three states and there is no reliable method for monitoring status of the species. The Yellowstone Grizzly population is isolated without ESA protections. The species requires safe corridors to reach other regions to expand the gene pool, this fact is absolutely vital for the long term survival of the bears. Without a sufficient gene-pool, genetic diversity is limited resulting in decline in health of the isolated populations, thereby reducing long term survival. While the Grizzly is one of the slowest reproducing mammals in North America, reproducing every three years at best, with the existing threats and challenges to the species already, losing protections will immediately effect the population, even more so the addition of an unnecessary "trophy" hunt would harvest more animals than can be reproduced, setting an immediate and stark decline in numbers. Further, if delisted, grizzlies will not be able to colonize other regions, especially under state management. Yellowstone park grizzlies are traveling further for their primary and vital food sources. This is not exceeding "carrying capacity" as has been claimed. Due to climate change, heavy pesticide use near the park, and the presence of invasive, non native fish species; these have caused catastrophic declines in the availability of White Bark pine tree nuts, they travel outside of the park to attain this food source. Non native species of trout is consuming the cutthroat trout, another primary source of food for the grizzly within the park borders. The army cutworm moths found at higher elevations within the park are in drastic decline due to heavy pesticide use outside the park. Grizzlies are going outside of the park find these sources, without protections, they will not be able to reach their food sources. Further, the grizzlies of Yellowstone, are accustomed to human presence. The grave concern with this is; the proposed "trophy" hunt can take place just barely outside the park borders. The bears have no fear of humans as they are used to their presence in the park as millions of tourists from around the globe come to Yellowstone just to see the wildlife, primarily grizzlies and wolves. Allowing a "trophy" hunt, targeting the park grizzlies is not only an easy hunt, but not a hunt at all, no less an ambush of the species. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, even resistant to managing a species of high importance to the non-hunting public and/or the federal government (i.e. - Gray wolves). In addition, even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. In comparison to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of aggressive state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. It has taken 40 years of protections to get where we are today, lifting protections prematurely sets great risk and consequence for long term survival of the species; add to that a pending "trophy" hunt will insure the grizzly population to decline back towards extinction within a very short period of time. Finally, tourism to Yellowstone National Park, brings in millions of annually. Delisting the iconic grizzly bear which people come from all over the globe to see, sets a negative tone, dangerous precedence, and puts that tourism in jeopardy. As a professional, as an American citizen and tourist, for all the reasons stated above, I strongly OPPOSE delisting the Yellowstone grizzly. And ask that you stop the process for delisting and continue vital ESA protections for the long term survival of the greatest bear species that exists. Thank you for your time and consideration in this extremely important matter.	FWS-R6-ES-2016-0042-0463
FWS claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claim: The shortage of cutthroat trout and white bark pine nutwos of the grizzly's primary foodis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yaak region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. FWS claim: Their agency will stay involved with protecting the grizzly population after delisting. The reality: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. FWS claim: The agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. The reality: When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting.	Population parameters		FWS-R6-ES-2016-0042-5043
THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc.	Population parameters	I do not support the delisting of Grizzly Bears in GYE. THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected.	FWS-R6-ES-2016-0042-5651
EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes.	Population parameters	I do not support the delisting of Grizzly Bears in GYE. THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected.	FWS-R6-ES-2016-0042-5651
GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected.	Population parameters	I do not support the delisting of Grizzly Bears in GYE. THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected.	FWS-R6-ES-2016-0042-5651

FWS claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Å Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. Å But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. Å The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally.	Population parameters	The U.S. Fish and Wildlife Service (FWS) wants to strip Endangered Species Act protection from the Greater Yellowstone Ecosystem grizzly bear. We have only until May 10 to comment on the FWS proposal. FWS claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claim: The shortage of cutthroat trout and white bark pine nuttwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. 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The reality: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. FWS claim: The agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. The reality: When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting.	FWS-R6-ES-2016-0042-5043
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The reality: When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting.	FWS-R6-ES-2016-0042-5043
Currently GYE Grizzly bears are at or near the carrying capacity for the area, leaving them on the Endangered Species List will only cause the use/waste of more tax dollars to relocate and protect these Grizzlies, not to mention the harm that will come to other large and small fauna.	Population parameters	"For the long-term viability of the Endangered Species Act, which is a powerful conservation tool, it needs to function as it was intended. It should not be used as a weapon to save some peoples' favorite animals from any possibility of human exploitation". Steven Rinella Currently GYE Grizzly bears are at or near the carrying capacity for the area, leaving them on the Endangered Species List will only cause the use/waste of more tax dollars to relocate and protect these Grizzlies, not to mention the harm that will come to other large and small fauna. This plan only includes the GYE Grizzlies therefore allowing continued protection of land and resources to protect and growth of Grizzlies in other lower 48 regions. Freeing up the tax dollars to be better spent on these efforts as opposed to 'wasting' those dollars protecting a population that has already recovered beyond what the Endangered Species Act requires. The Federal Government will have to first approve each state's management plan and thereby still maintains control or the GYE Grizzlies. Looking at the success with which the wolf recovery program has had should be a shining beacon as to how well the State's and Federal Government can work together to both provide protection to as well as control of any species looking to become delisted.	FWS-R6-ES-2016-0042-5058
It's misleading to give the doubling of this population as an indicator if its stability. That doubling was the growth from 2% of the number in existence for tens of thousands of years and then reduced by 98% in less than one hundred years by sport hunting, nearly decimated twice, to 4%. And that growth was a result if FWS efforts. Why would the FWS put the results of that work in jeopardy by allowing same practice that nearly brought the grizzly to extinction in the last century? "Fool me once..." It's like a contractor offering a long dormant group of arsonists the opportunity to keep burning a house that they once nearly destroyed and he hasn't quite repaired. Sport hunters aren't criminals, but it is a destructive practice that depletes a population much faster than government efforts can rebuild them. FWS' works shouldn't be squandered like this. Only 20-26% of people surveyed have supported delisting or hunting seasons and the rates are lower in the local area. 50 Native governments have sent formal documents announcing their opposition to the delisting. There is no popular support for delisting. The tourism benefit of bringing into GYE sport hunters is so small compared to the loss of non-hunting tourists, as all of them now are, for whom the chance of seeing wildlife is such an important part of the park's appeal. For every one person who could shoot a given grizzly, fifty could have the experience if crossing its path, or seeing it through a telescope, finding its scat on a trail, or seeing the unbelievably high scratchings on a tree. Those are all memorable, maybe beautiful, maybe exhilarating or even terrifying experiences that make lifelong impressions and are taken away from a tourist, park ranger, local resident, and the whole ecosystem when a bear is killed. The potential tourism growth is outweighed by the potential loss, people don't support this, at all, and it doesn't make sense to hand the small recovery the GYE ecosystem has made straight back to the interests that recklessly inflicted the injury it's currently nursing, no matter how slow or carefully.	Population parameters		FWS-R6-ES-2016-0042-5067

Grizzly bear food sources (including the whitebark pine) are collapsing and mortality rates are already increasing.	Population parameters	Please do not delist Grizzly Bears. Now is not the time to take away protections for this at-risk native species. In a time when climate change and habitat loss are challenging all wildlife to adapt and survive, the only reasonable and responsible action will be to rule that Grizzly Bears should not be delisted at this time. Grizzly bear food sources (including the whitebark pine) are collapsing and mortality rates are already increasing. Yellowstone Grizzly bears are experiencing a high level of conflict with humans and delisting would mean that any hungry bear who steps outside Yellowstone National Park will be killed by waiting hunters. Bears do not recognize park boundaries and bears just need to eat. The Greater Yellowstone Ecosystem is their home, and that includes the park and areas outside its boundaries. It is a fact that a prime motivation for the states of Idaho, Montana and Wyoming in pushing for delisting of Grizzly bears is trophy hunting and the perceived economic gain this 'sport' will bring. While the USFWS estimates there are more than 700 grizzlies in the Greater Yellowstone Ecosystem, no one really knows how many bears there are and this number could well be an over-estimation of true populations. Until it is known exactly how many grizzly bears exist in the Greater Yellowstone Ecosystem, it would be irresponsible to delist them and allow the states to open up their trophy hunt programs. Sport hunting is unnecessary for managing a stable bear population. At minimum, there should be a delay in the onset of hunting until Idaho, Montana and Wyoming have demonstrated their commitment to a responsible management plan and maintaining a stable population, particularly given the record high number (59) of bears killed in 2015. The leading cause of bear mortality is conflicts with humans. In remembrance of Scarface, the 25-year old Grizzly bear who was a park visitor favorite, and the first Grizzly bear I ever saw. Yet he was recently killed by a hunter outside park boundaries when he wandered, likely in search of food. A park icon gone, because he didn't read the park boundary signs and someone was waiting to kill him. This is what will happen to many more Grizzly bears if they are delisted now. Please do not delist Grizzly bears at this time. They must remain protected until Idaho, Montana and Wyoming have reasonable and science-based management plans in place, plans that do not consist of trophy hunting. Thank you for your consideration.	FWS-R6-ES-2016-0042-5074
While the USFWS estimates there are more than 700 grizzlies in the Greater Yellowstone Ecosystem, no one really knows how many bears there are and this number could well be an over-estimation of true populations. Until it is known exactly how many grizzly bears exist in the Greater Yellowstone Ecosystem, it would be irresponsible to delist them and allow the states to open up their trophy hunt programs.	Population parameters	Please do not delist Grizzly Bears. Now is not the time to take away protections for this at-risk native species. In a time when climate change and habitat loss are challenging all wildlife to adapt and survive, the only reasonable and responsible action will be to rule that Grizzly Bears should not be delisted at this time. Grizzly bear food sources (including the whitebark pine) are collapsing and mortality rates are already increasing. Yellowstone Grizzly bears are experiencing a high level of conflict with humans and delisting would mean that any hungry bear who steps outside Yellowstone National Park will be killed by waiting hunters. Bears do not recognize park boundaries and bears just need to eat. The Greater Yellowstone Ecosystem is their home, and that includes the park and areas outside its boundaries. It is a fact that a prime motivation for the states of Idaho, Montana and Wyoming in pushing for delisting of Grizzly bears is trophy hunting and the perceived economic gain this 'sport' will bring. While the USFWS estimates there are more than 700 grizzlies in the Greater Yellowstone Ecosystem, no one really knows how many bears there are and this number could well be an over-estimation of true populations. Until it is known exactly how many grizzly bears exist in the Greater Yellowstone Ecosystem, it would be irresponsible to delist them and allow the states to open up their trophy hunt programs. Sport hunting is unnecessary for managing a stable bear population. At minimum, there should be a delay in the onset of hunting until Idaho, Montana and Wyoming have demonstrated their commitment to a responsible management plan and maintaining a stable population, particularly given the record high number (59) of bears killed in 2015. The leading cause of bear mortality is conflicts with humans. In remembrance of Scarface, the 25-year old Grizzly bear who was a park visitor favorite, and the first Grizzly bear I ever saw. Yet he was recently killed by a hunter outside park boundaries when he wandered, likely in search of food. A park icon gone, because he didn't read the park boundary signs and someone was waiting to kill him. This is what will happen to many more Grizzly bears if they are delisted now. Please do not delist Grizzly bears at this time. They must remain protected until Idaho, Montana and Wyoming have reasonable and science-based management plans in place, plans that do not consist of trophy hunting. Thank you for your consideration.	FWS-R6-ES-2016-0042-5074
These bears are still a relatively isolated and small population. To de-list them now opens the population to trophy hunters, which can easily decimate this slowly recovering group.	Population parameters	I urge the Fish and Wildlife Service to please reconsider de-listing the Grizzly Bear from the list of Endangered and Threatened Wildlife. These bears are still a relatively isolated and small population. To de-list them now opens the population to trophy hunters, which can easily decimate this slowly recovering group. Do we really want to see the bears decline such that they would need to be listed again in just two or three years? There is already abundant evidence that not all trophy hunters abide by regulations; there is poaching. These bears symbolize part of our national and natural heritage that should NOT be destroyed merely so a few more hunters can have a bear-skin rug and a tale to tell. Please protect the bears.	FWS-R6-ES-2016-0042-5086
Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population.	Population parameters	The USFWS is pushing to delist the Yellowstone grizzly bears. It's obvious why they're doing this. Trophy hunters are itching for a grizzly bear hunt to satisfy their blood lust and ego's and the USFWS is perfectly happy to make their dreams come true. Please don't allow this to happen. They're not just after grizzlies in the Yellowstone ecosystem but Montana is already pushing for the delisting of all grizzly bears, specifically the great bear population in Northwest Montana. Please take a moment and speak out for this iconic species. They are voiceless, we must speak for them! Follow the link to the USFWS comment page and stand up for the grizzly bear. Points to make: 1. Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population. 2. Grizzly bears are not recovered across their historic range. 3. Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399, would be threatened by the delisting. == The Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife	FWS-R6-ES-2016-0042-5087
The growth of the grizzly population has leveled off; the current population estimate is down six percent from 2014. Mortality from all causes, as reported by the government, was 59 grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the bears that will be shot in the trophy hunt and you could easily approach 200 dead grizzlies in a single year. Even a population of 700 grizzly bears would be doomed to extinction by such heavy mortality. (Peacock, 2016)	Population parameters	We are adamantly against delisting the Greater Yellowstone Grizzly Bears from the Endangered and an Threatened Wildlife Species Act. An example as to why delisting of protected wildlife can be detrimental to a species has occurred with State management of the wolf population in Wyoming, Montana, and Idaho. Contest killings in both Montana and Idaho have occurred, which reflect the hatred that people have for "predator" species, and have been ignored by the States' FWS. The only certain outcome of delisting the Yellowstone grizzly bears is that it will result in trophy hunting. With delisting, the federal government will turn over grizzly management decisions outside of the park's boundaries to three states that will show no restraint in killing grizzlies. (Peacock, 2016) The Service has fiercely maintained that even if problems arise [under state management], it will not relist the population. Despite some laudatory language about co-existence with grizzly bears, the state grizzly bear management plans lack any binding commitments to do anything other than hunt bears. (Willcox, 2016) The growth of the grizzly population has leveled off; the current population estimate is down six percent from 2014. Mortality from all causes, as reported by the government, was 59 grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the bears that will be shot in the trophy hunt and you could easily approach 200 dead grizzlies in a single year. Even a population of 700 grizzly bears would be doomed to extinction by such heavy mortality. (Peacock, 2016) Even though the states may be somewhat cautious during the first five years of federal oversight that follows delisting, there is every reason to believe that, over time, state management will reverse the gains made over the last 40 years of endangered species protections. This is especially likely given the crisis that Yellowstone grizzly bears are facing now. During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably are dead. This totals over 90 bears, or more than 12% of the population. The primary factor affecting grizzly bears at both the individual and population level is excessive human-caused mortality. Regulating human-caused mortality through habitat management is an effective approach, as evidenced by increasing grizzly bear populations in the lower 48 States where motorized access standards exist (e.g., GYE and Northern Continental Divide Ecosystem). This requires ongoing monitoring of the grizzly bear population to understand if it is sufficiently resilient to allow for a conservative level of human-caused mortality without causing population decline. We must allow adequate protections for these magnificent animals, so they are not another species destroyed by humans and management policies that are centered around a financial gain and political pressure.	FWS-R6-ES-2016-0042-5103
Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population. Grizzly bears are not recovered across their historic range.	Population Parameters	STOP the plans to remove the the greater Yellowstone Ecosystem Population of grizzly bears from the endangered and threatened wildlife listing. Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population. Grizzly bears are not recovered across their historic range. Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399, would be threatened by the delisting. In addition, I require an investigation into conflict of interest governing discussions and decisions for the proposed delisting of the grizzly bear. It appears that the Fish and Wildlife Service is in direct conflict with their requirement to protect wildlife and have now become a "captured agency" also known as "regulatory capture" in favor of big game trophy hunters. Regulatory capture is a form of political corruption that occurs when a regulatory agency, created to act in the public interest, instead advances the commercial or special concerns of interest groups that dominate the industry or sector it is charged with regulating. Regulatory capture is a form of government failure; it creates an opening for firms to behave in ways injurious to the public (e.g., producing negative externalities). The agencies are called "captured agencies".	FWS-R6-ES-2016-0042-5121

Actual numbers of grizzly bears are merely estimates as are the numbers required to support a sustainable populations for one of the slowest-reproducing mammals in North America with female grizzlies giving birth only every three years, if conditions are right.	Population parameters	I am a veterinarian, a biologist and a concerned citizen and for the reasons stated below, it is my firm contention that grizzly bears should not be delisted in the Greater Yellowstone Ecosystem. Actual numbers of grizzly bears are merely estimates as are the numbers required to support a sustainable populations for one of the slowest-reproducing mammals in North America with female grizzlies giving birth only every three years, if conditions are right. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399 would be threatened by the delisting. FWS could well see more than 40 years of recovery efforts squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. By the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range and grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yaak region." Therefore, the grizzly bear cannot be delisted in just the GYE. The management of isolated populations of free-ranging carnivores like grizzly bears and wolves is flawed. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. A leaked memo states that if the GYE grizzly bears are delisted, that they will open up trophy hunting seasons for grizzlies in Wyoming, Idaho and Montana which suggests that opening such seasons is a prime motivation for the states in pushing for de-listing. The FWS needs to strongly consider the majority interests of the American people including hunters. A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: -55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. -More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. -Only 20% support trophy hunting. -50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS needs to make a concerted effort to work with the Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting.	FWS-R6-ES-2016-0042-5116
While the Grizzly Bear is an icon of the Yellowstone Eco System I suggest these observations: 1. Yellowstone Park is overpopulated with people.2. The concentration of people on the limited road access has driven these icons further away from mass crowds gawking at wildlife.3. The number of bears outside of the park has reached a potential crisis point. 4. Every predator (defined as an animal that will kill anything to be fed) needs a predator. The sad truth is the human is the only predator of the Grizzly. It is our responsibility that these bears are controlled. This does not mean that they should never kill a domesticated animal but they should be regulated.	Population parameters	While the Grizzly Bear is an icon of the Yellowstone Eco System I suggest these observations: 1. Yellowstone Park is overpopulated with people.2. The concentration of people on the limited road access has driven these icons further away from mass crowds gawking at wildlife. 3. The number of bears outside of the park has reached a potential crisis point. 4. Every predator (defined as an animal that will kill anything to be fed) needs a predator. The sad truth is the human is the only predator of the Grizzly. It is our responsibility that these bears are controlled. This does not mean that they should never kill a domesticated animal but they should be regulated. 5. It would seem that Yellowstone Park must have wildlife to support the financial aspect of how this park is maintained. If the Bear population were to continue to grow unchecked it will become inevitable that bears will kill other Grizzly Bears, black bears, and anything else that is a food resource. Does it serve the bear to allow bears to fight each other for sustenance? My suggestion is to evaluate how the Park manages the tourists. They are the top of the food chain. Then create new zones for tourists within the Park. After all it was created "for the people" and today it is managed not for the people. Millions come in the summers and it is highly unlikely they will see a Grizzly Bear, let alone any wildlife other than Buffalo which are about the same as Angus cows grazing Paradise Valley. It is really disappointing to see how poorly Yellowstone Park is managed. It is embarrassing to see how the visitors who come to interact with wildlife are directed to a highway and accommodated with shabby campgrounds, and poor housing. It has become a theme park without a theme.	FWS-R6-ES-2016-0042-5131
The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America.. By the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range and grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally.	Population parameters	I am a veterinarian, a biologist and a concerned citizen and for the reasons stated below, it is my firm contention that grizzly bears should not be delisted in the Greater Yellowstone Ecosystem. Actual numbers of grizzly bears are merely estimates as are the numbers required to support a sustainable populations for one of the slowest-reproducing mammals in North America with female grizzlies giving birth only every three years, if conditions are right. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399 would be threatened by the delisting. FWS could well see more than 40 years of recovery efforts squandered in a couple of years of sport hunting. 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The species is far from recovered nationally. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yaak region." Therefore, the grizzly bear cannot be delisted in just the GYE. The management of isolated populations of free-ranging carnivores like grizzly bears and wolves is flawed. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. A leaked memo states that if the GYE grizzly bears are delisted, that they will open up trophy hunting seasons for grizzlies in Wyoming, Idaho and Montana which suggests that opening such seasons is a prime motivation for the states in pushing for de-listing. The FWS needs to strongly consider the majority interests of the American people including hunters. A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: -55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. -More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. -Only 20% support trophy hunting. -50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS needs to make a concerted effort to work with the Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting.	FWS-R6-ES-2016-0042-5116
EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources.	Population parameters	THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain listed. Thank you	FWS-R6-ES-2016-0042-5148
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Grizzly bear recovery has been a slowly successful, long-term process for the Interagency Grizzly Bear Study Team; they should be proud of their efforts. But I don't believe there is scientific consensus that the species is beyond the need for protection. And I don't believe there is agreement among all interests that the grizzly population is stable enough to withstand hunting.	Population parameters	I am writing to say I do not support the USFWS plan to delist the grizzly bear. Grizzly bear recovery has been a slowly successful, long-term process for the Interagency Grizzly Bear Study Team; they should be proud of their efforts. But I don't believe there is scientific consensus that the species is beyond the need for protection. And I don't believe there is agreement among all interests that the grizzly population is stable enough to withstand hunting. The USFWS states in a their press release from March 3, 2016 that delisting does not solely rely on numbers but also includes "the quantity and quality of habitat, adequate regulatory mechanisms to maintain a healthy and viable population, and a good balance of male and female bears that are well-distributed throughout the ecosystem." I believe all of these factors are unresolved and continue to place the grizzly bear at risk. 1) Quantity/quality of habitat. Climate change and development pressure continue to impact grizzly bear food sources and habitat. Traditional food sources (whitebark pine, cutworm moths, cutthroat trout) are threatened by climate change and invasive species. Development continues to fragment the edges and connectivity of core grizzly bear range. Management needs to aggressively protect habitat including limiting development and road densities in core areas. USFWS needs to work with states and other land management agencies to ensure long-term habitat protection. 2) Regulatory mechanisms. There are not adequate regulatory mechanisms in place to guarantee grizzly populations are maintained, especially if hunting is allowed. USFWS and states need to set strict caps on grizzly mortality and ensure mechanisms and funding are in place to reduce human-bear conflict. 3) Bear distribution. Scientists and concerned citizens have always maintained that in order to ensure a strong and stable population there must be a genetic connectivity to other grizzly populations in the Northern Rockies. I am concerned that pressure from hunting and other human-bear conflict will continue to isolate the Greater Yellowstone population. On an emotional and intellectual level I just don't believe an iconic animal such as the grizzly bear should be hunted. If they were restored to their historic range and allowed to roam the Rocky Mountains, the Great Plains and the Central Valley I might feel differently, but that is never going to happen. I think there is too much risk of increased mortality to bears if a spring and fall hunting season is opened. Finally, I don't think delisting is an appropriate tool of adaptive management when applied to conservation biology. I'm not sure it works well within the regulatory framework of the Endangered Species Act. It is too coarse, too slow, and does not allow for versatile adaptability. I think it will be much more challenging to relist the grizzly than it is to delist (which is proving challenging enough). The numbers might look good at this moment in time but I'm worried about the long-term trend, with unresolved pressure from climate change and habitat fragmentation, on the stability of the grizzly bear.	FWS-R6-ES-2016-0042-5158
The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada.	Population parameters	De-listing the Grizzly is a grievous error that threatens species diversity in the West: The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public. The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population. Research has also shown threshold population effects, which could mean that by the time the problem is detected, it is too late to fix the problem.	FWS-R6-ES-2016-0042-5203
The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population. Research has also shown threshold population effects, which could mean that by the time the problem is detected, it is too late to fix the problem.	Population parameters	De-listing the Grizzly is a grievous error that threatens species diversity in the West: The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public. The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population. Research has also shown threshold population effects, which could mean that by the time the problem is detected, it is too late to fix the problem.	FWS-R6-ES-2016-0042-5203
US FWS must submit their population data for proper peer review (the Interagency Grizzly Bear Study Team doesn't count.) There may well be 700 bears, but it is suspect that the number nearly doubled in 2007 when delisting was on the table. It is suspect that for many yrs the population was 260-600, then all of a sudden it was a solid 700. The methods involve a lot of extrapolation from very few verifiable sightings and that should make us nervous. An independent, unbiased, qualified source can be trusted with the geographic data the IGBST is reticent to release.	Population parameters	I have spend a significant amount of time in Yellowstone from 1995 to present. I have a deep love for the Greater Yellowstone Ecosystem and want my children to be able to grow up and see this land as I have come to know it -- a large are a of relatively undisturbed habitat. Removing Grizzly Bears will drastically change the dynamics of the ecosystem. We are going to see a decrease in bears WITHOUT hunting, due to development and an increase in the human population in the Greater Yellowstone Ecosystem (GYE), especially after delisting when so much of their habitat will be opened to fracking, natural gas development, mining and trophy homes. By the time we need to re-list, which will most certainly happen due to a variety of reasons below, we will have lost critical habitat and many other species under the grizzly umbrella. Having lived in the GYE for the past 20 years, learning and teaching about this ecosystem, I promise you, this will have major effects. The number one threat to the GYE is climate change. We are currently experiencing an extinction rate 100x greater than anything on the paleontological record, and it is our fault. Water availability affecting flora and fauna, foods for grizzlies, will be affected. Plants will be migrating up, or north and bears may not be able to follow them. A precarious population with an extremely low growth rate will not fare well under any circumstances, let alone one without utmost protection. Their threatened critical food sources (trout, whitebark pines) that are supposedly being replaced with other sources do not take into account the difference in caloric value, quality of food, seasonal needs, and availability without human interference. There are temporal, spatial, caloric and risk factors that aren't being addressed in the proposal. The "adaptable bear" argument is moot. US FWS must submit their population data for proper peer review (the Interagency Grizzly Bear Study Team doesn't count.) There may well be 700 bears, but it is suspect that the number nearly doubled in 2007 when delisting was on the table. It is suspect that for many yrs the population was 260-600, then all of a sudden it was a solid 700. The methods involve a lot of extrapolation from very few verifiable sightings and that should make us nervous. An independent, unbiased, qualified source can be trusted with the geographic data the IGBST is reticent to release. The fact that the Northern Continental Divide Ecosystem bears are not on the chopping block is odd. There are more bears in that population, yet ours are threatened with less protection. The incredible pressure on this land for development of second (and third) homes, fracking, mining and general development is astonishing, and powerful enough to convince public officials we should throw caution to the wind and see how it goes. There was a 6% decrease in the past 2 years and at least 59 known dead last year (likely higher). This is a trend for the past few years. Actual numbers will rise and fall, but there is not an overall growth trend. Grizzly protection also shelters my sanity. To live and hike in griz country moves me to an equilibrium that's hard to find in an ever more deafening society, and it is irreplaceable. Being face to face with a grizzly leaves with my cells on fire, and a passion for life you cannot buy. Having a daughter later in life is directly tied to me raising her in a place where wilderness reigns.	FWS-R6-ES-2016-0042-5209
One of the facts that our clients always find interesting is that the grizzly bear is the slowest reproducing mammal in North America. When there are conflicts between humans and bears and a female bear is removed from the ecosystem, her future reproductive potential is an exponential loss.	Population Parameters	I am writing to express my opposition to the delisting of the grizzly bear from protection under the the Endangered Species Act. I oppose this because based on the scientific data I have reviewed. Specifically, in Yellowstone Ecosystem, there are several critical issues that adversely affect the availability of food sources upon which the grizzly bear relies. These uncertainties are primarily the result of ongoing climate change in the ecosystem. I am currently associated with Montana State University where I study ecosystem responses to climate. There is no certainty that the food sources currently available to the grizzly will continue to be available in the near future. In fact, it is highly likely that the food sources currently available to the grizzly will decline over the very near future. Further, there is an ever-increasing threat to the bear's habitat where development is encroaching into wild places causing conflict between bears and humans. For example, when bears are unable to access the food sources that have become scarce, specifically white bark pine nuts in fall, during the hunting season, we have seen a notable increase in bear/human conflicts. Should bears be removed from the ESA, they will be vulnerable as they feed on the army cutworm moth in late summer making large numbers of them. I find the proposal to designate the bears of the GYE as a distinct population segment to be arbitrary and capricious. The GYE population will most certainly decline as their genetic diversity stagnates. It is irresponsible not to encourage continuity between the bears of the GYE and those of the Northern Continental Divide population and Cabinet Yak populations. The problem remains that there is not a population of grizzlies in the Central Idaho Wilderness. In addition to my academic career, I own a small tour business in Gardiner, Montana, Wild Bear Adventures. One of the facts that our clients always find interesting is that the grizzly bear is the slowest reproducing mammal in North America. When there are conflicts between humans and bears and a female bear is removed from the ecosystem, her future reproductive potential is an exponential loss. Further, the success of my business relies on a healthy bear population, one that has not been impacted by hunting which, as the data show is the case with wolves, they are comfortable occupying all of their habitat, increasing the chances of being viewed by visitors and increasing our opportunity to share information with the public. Therefore, for these and many other reasons too numerous for me to mention here, do not remove the grizzly bear from protection under the Endangered Species Act.	FWS-R6-ES-2016-0042-5217
#NAME?	Population parameters	#NAME?	FWS-R6-ES-2016-0042-5249
In the 40 years grizzlies were protected under the Endangered Species Act, the population rose from 136 to an estimated 720 individuals in the GYE. While this should be celebrated, it should not mean that safeguards for grizzly bears are removed and sport hunts are commen"ed. This past year, the Interagency Grizzly Bear Committee study te"m .reported 59 known and probable grizzly bear mortalities, 55 of which were human caused. How can our GYE grizzly bear population sustain this in addition to added	Population parameters	See Attached Attachments Sheehy Pike Lisa	FWS-R6-ES-2016-0042-0522

Maintain only 500 grizzlies in the Greater Yellowstone Ecosystem (GYE). With estimates over 700, there is no motivation for the states to maintain grizzly numbers.	Population parameters	1) The Primary Conservation Area... (PCA) does not include all of Grand Teton National Park and areas of the Northern Wind Rivers and Upper Green River where grizzlies have long been established. The PCA should be expanded and updated to include these and all areas where grizzlies are currently found. 2) Areas outside the PCA are referred to the Demographic Management Area (DMA). The DMA will be mostly managed by state agencies. Fortunately a good chunk of grizzly habitat falls within tribal lands (in WY) not subject to heavy handed state mismanagement of predators. 3) The entirety of the Wyoming Range, Caribou Range (Idaho), and the Targhee National Forest west of Jackson, WY should be included in the DMA. Grizzly populations currently in the Wyoming Range and other areas that fall outside of the DMA, are subject to extreme management actions and killing by hunters. No incentive to protect bears in suitable habitat outside the DMA. 4) Grizzlies located outside the PCA will be "allowed to expand into biologically suitable and socially acceptable areas". How does a state, hostile to predators, identify what is socially acceptable. A blank check for heavy handed management. Again, areas in the Upper Green, around Teton Park, and the northern Wind River Range with established grizzly populations most likely will see dramatic decreases in numbers. 5) Maintain only 500 grizzlies in the Greater Yellowstone Ecosystem (GYE). With estimates over 700, there is no motivation for the states to maintain grizzly numbers. 6) There is already a lot of human caused mortality outside the PCA, especially in the Upper Green River and Wind River areas. This probably will become worse since the State will have primary management control in these areas. 7) There are still healthy stands of Whitebark Pine outside the PCA in the Northern and Southern Wind Rivers, vital food for grizzlies. These areas will be primarily managed by the states. 8) The Wyoming management of grizzlies in the DMA as stated in their management plan, "significant consideration will be given to humans". We can only assume grizzlies will pay with their lives more often at the hands of state employees. Socially Accepted = Intolerance. 9) Wyoming Plan and handling of nuisance bears; "Grizzlies displaying natural aggression may be removed from the population." Natural aggression is defined as a grizzly defending itself, cubs, or food source. In the DMA, seems like grizzlies will be killed when they simply defend themselves by our intrusions. 10) A grizzly getting into chicken coups (without electric fences or other means to try and deter grizzlies) most likely will be killed by game managers, especially in the DMA. This is an alarming trend in grizzly country with the rise of people wanting to raise their own chickens. Outside of cattle and sheep, chickens are resulting in dead grizzlies. 11) The concern over sport hunting is real. There should be a moratorium on any sport hunting for 10 years to ensure the State is doing all it can to preserve grizzlies. 12) I DO NOT support delisting grizzlies in the Greater Yellowstone Area. It ensures the population will remain an isolated population. Historically hostile views of western states towards predators is proof enough that grizzlies should not be delisted. Wyoming has yet to turn in an acceptable wolf plan. How can it be expected to manage the vast majority of grizzlies within the GYE.	FWS-R6-ES-2016-0042-0533
Their recent proposal to delist Greater Yellowstone Ecosystem (GYE) grizzly bears from the Endangered Species Act is far too premature and threatens the very existence of this population. There numbers are way too low, only around 700, and do not represent a healthy, recovered population that is large enough to be stable and able to withstand trophy hunting.	Population parameters	Yet again, the U.S. Fish & Wildlife Service is making decisions for wildlife management that do not bode well for the actual recovery of the species they are supposed to be protecting. Their recent proposal to delist Greater Yellowstone Ecosystem (GYE) grizzly bears from the Endangered Species Act is far too premature and threatens the very existence of this population. There numbers are way too low, only around 700, and do not represent a healthy, recovered population that is large enough to be stable and able to withstand trophy hunting. If we lose grizzly bears in the Yellowstone area, we risk losing part of what makes the region so incredible. GYE grizzlies are the most famous in the world and draw in millions of tourists looking to spot the large, rare species. Not to mention the significant impact those tourist dollars have on the local communities and businesses. I'm asking you to support what the majority of Wyoming citizens want which is continued Federal protection of the Grizzlies!!	FWS-R6-ES-2016-0042-0541
The United States Fish and Wildlife Service proposes to remove the Greater Yellowstone Ecosystem (GYE) Grizzly Bears from the Endangered and Threatened Wildlife list. Also, the affected states promise to continue to ensure the grizzly bear population remains. I think that delisting the Grizzly Bears would only work if there were policies that were strictly enforced to ensure the continuation of the grizzly bear population. The major worry is that human caused mortality will quickly exceed the grizzly bear reproduction. The grizzly bear reproduction is a slow process and about half the cubs do not survive. Based on the fact that they are slow reproducers I believe the bears should stay on the endangered list for at least 5-10 more years and then maybe slowly introduce different policies that may allow regulated hunting again.	Population parameters	The United States Fish and Wildlife Service proposes to remove the Greater Yellowstone Ecosystem (GYE) Grizzly Bears from the Endangered and Threatened Wildlife list. Also, the affected states promise to continue to ensure the grizzly bear population remains. I think that delisting the Grizzly Bears would only work if there were policies that were strictly enforced to ensure the continuation of the grizzly bear population. The major worry is that human caused mortality will quickly exceed the grizzly bear reproduction. Grizzly bear reproduction is a slow process and about half the cubs do not survive. Based on the fact that they are slow reproducers I believe the bears should stay on the endangered list for at least 5-10 more years and then maybe slowly introduce different policies that may allow regulated hunting again. According to an article in the national geographic that addresses this issue, it is believed that if the very states that failed to ensure the populations of grizzly bears gain control again, the population will quickly dwindle. Also, it is believed that this means the laws implanted will not be enforced well by these states. According to the article, the bears are worth a billion annually alive than dead, so it is better to keep the hunting levels down. Another problem endangering the grizzly bears is habitat and food. According to Yellowstone, there has been a 15-20 percent loss of their genetic variability. This could cause "inbreeding and worsen problems stemming from food loss, habitat loss and conflicts with people. A lot of these problems have to do with increased interaction between bears and humans. Dr. Michael Gibeau has done a lot of research on the correlation between increased number of roads and bear mortality. Based on this information, bears are greatly affected by the amount of human interaction and can definitely stress them out. I believe that the best way to conserve the bears is to conserve their habitat and try to decrease the human interaction (for example by building fewer roads through their homes). In conclusion I think that the bears should not be delisted, at least not right now. When thinking about laws as a nation we must remember there will always be people who break the law. Therefore delisting them can cause people to break the rules more and more, as the laws become increasingly lenient.	FWS-R6-ES-2016-0042-0569
grizzly bears still occupy less than 2% of their original historic range. How is that considered a success? It is known that the growth rate of the population has been stagnant since the early 2000s. And the reason for that is because more bears are dying as a result of conflicts with hunters and livestock and fewer cubs are growing to adulthood. How is that considered a success? It is known through science that bears reproduce very slowly. How many bears die of natural causes? Most are killed by hunting or by traffic all of which in and of itself affect the genetic makeup of bears. Bears are not allowed even today to reach maturity let alone old age because of adults killing cubs or pressures from hunting or mortality from accidents along with poaching. Bears are still in jeopardy because of less habitat and less food. Although the GYE Grizzlies' numbers are up now, delisting them could completely undo the progress of the past 40 years. The habitat encroachment and increased human activities around the Grizzlies' territory is also a cause for not delisting the animal. Counties surrounding National Parks are shown to have high rates of growth and Yellowstone is no exception. According to Yellowstone Park, "20 counties surrounding the	Population Parameters	See attached file(s). In the attached file, I have comments on the following docket number: Number FWS-R6-ES-2016-0042. Attachments Comments on Delisting Grizzly Bears.20160331	FWS-R6-ES-2016-0042-0540
It is known through science that bears reproduce very slowly. How many bears die of natural causes? Most are killed by hunting or by traffic all of which in and of itself affect the genetic makeup of bears. Bears are not allowed even today to reach maturity let alone old age because of adults killing cubs or pressures from hunting or mortality from accidents along with poaching. Bears are still in jeopardy because of less habitat and less food. Although the GYE Grizzlies' numbers are up now, delisting them could completely undo the progress of the past 40 years. The habitat encroachment and increased human activities around the Grizzlies' territory is also a cause for not delisting the animal. Counties surrounding National Parks are shown to have high rates of growth and Yellowstone is no exception. According to Yellowstone Park, "20 counties surrounding the	Population parameters	See attached file(s). In the attached file, I have comments on the following docket number: Number FWS-R6-ES-2016-0042. Attachments Comments on Delisting Grizzly Bears.20160331	FWS-R6-ES-2016-0042-0540
Currently, the grizzly population in the lower 48 states is less than two percent of their pre-settlement population and they occupy such a small region in the Yellowstone Ecosystem. Their numbers are still small even though they were placed on the Endangered Species List and by delisting the grizzly population, they will be subject to trophy hunts, which will invariably give rise to their extinction.	Population parameters	It has come to my attention the U.S. Fish and Wildlife Service is proposing to remove grizzly bears in the Yellowstone Ecosystem from the Endangered Species List. Currently, the grizzly population in the lower 48 states is less than two percent of their pre-settlement population and they occupy such a small region in the Yellowstone Ecosystem. Their numbers are still small even though they were placed on the Endangered Species List and by delisting the grizzly population, they will be subject to trophy hunts, which will invariably give rise to their extinction. The Grizzlies' are taking measures to compensate for this reduction in food, but it proves to be difficult with less livable area. Food shortage leads for Grizzlies to become hungrier and more desperate for food. Bear advocate Louisa Wilcox said, "when bears traverse the landscape looking for food, they bump into people at high rates, and when they bump into people, they tend to die at high rates." The bears' long-term could be in jeopardy because of less habitat and less food. Although the GYE Grizzlies' numbers are up now, delisting them could completely undo the progress of the past 40 years. The habitat encroachment and increased human activities around the Grizzlies' territory is also a cause for not delisting the animal. Counties surrounding National Parks are shown to have high rates of growth and Yellowstone is no exception. According to Yellowstone Park, "20 counties surrounding the	FWS-R6-ES-2016-0042-0604
Housing, retailing, and energy development in Yellowstone's surrounding counties have been accelerating in the past decade. Additionally, the bears' major food sources - such as white bark pine nuts, cutthroat trout, and ungulate meat - are becoming threatened. The Grizzlies' are taking measures to compensate for this reduction in food, but it proves to be difficult with less livable area. Food shortage leads for Grizzlies to become hungrier and more desperate for food. Bear advocate Louisa Wilcox said, "when bears traverse the landscape looking for food, they bump into people at high rates, and when they bump into people, they tend to die at high rates." The bears' long-term could be in jeopardy because of less habitat and less food. Although the GYE Grizzlies' numbers are up now, delisting them could completely undo the progress of the past 40 years. The habitat encroachment and increased human activities around the Grizzlies' territory is also a cause for not delisting the animal. Counties surrounding National Parks are shown to have high rates of growth and Yellowstone is no exception. According to Yellowstone Park, "20 counties surrounding the	Population Parameters	The Greater Yellowstone Ecosystem (GYE) Grizzly Bear is an intelligent and emotional creature that is crucial to Yellowstone's and its surrounding areas' ecosystems. The population numbers alone show that the bear has more than tripled its numbers from the time the GYE Grizzly Bear was added to the Endangered Species List in 1975, growing from less than 200 to close to 800. This population increase is a huge improvement and cause for acknowledgement; however, the numbers alone do not tell the full story. Housing, retailing, and energy development in Yellowstone's surrounding counties have been accelerating in the past decade. Additionally, the bears' major food sources - such as white bark pine nuts, cutthroat trout, and ungulate meat - are becoming threatened. The Grizzlies' are taking measures to compensate for this reduction in food, but it proves to be difficult with less livable area. Food shortage leads for Grizzlies to become hungrier and more desperate for food. Bear advocate Louisa Wilcox said, "when bears traverse the landscape looking for food, they bump into people at high rates, and when they bump into people, they tend to die at high rates." The bears' long-term could be in jeopardy because of less habitat and less food. Although the GYE Grizzlies' numbers are up now, delisting them could completely undo the progress of the past 40 years. The habitat encroachment and increased human activities around the Grizzlies' territory is also a cause for not delisting the animal. Counties surrounding National Parks are shown to have high rates of growth and Yellowstone is no exception. According to Yellowstone Park, "20 counties surrounding the Greater Yellowstone Ecosystem jumped a whopping 14 percent in population in the last decade." An increase in the human population will call for more roads, more houses, more materials gathered. All of these factors will leave less habitat space for bears, while increasing the likelihood of human and bear interactions, which, unfortunately, more often than not leads to a dead bear. Bears are also very opportunistic and will eat whatever food it can get its paws on. The problem with this is that once bears get into contact with food from humans, whether it is waste, bird feed or gardens, they will often return for more. Again, increasing the contact between humans and bears. I oppose the proposed rule to delist the Greater Yellowstone Ecosystem Grizzly Bear because it will inevitably lead to the re-addition of the bear to the Endangered Species List. http://news.nationalgeographic.com/2015/10/151001-grizzly-bears-animals-science-conservation-nation/ http://www.counterpunch.org/2016/01/01/delisting-the-grizzly-a-recipe-for-more-bear-deaths/ http://www.yellowstonepark.com/grizzly-bears-endangered/	FWS-R6-ES-2016-0042-0571
Additionally, the science is clear that delisting is premature and that grizzly bears have not fully recovered in the Greater Yellowstone Ecosystem. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupies an insignificant proportion of their pre-settlement range.	Population parameters	Besides their inherent value as sentient beings, grizzly bears fulfill a vital role in their ecosystem and they provide tremendous value in the form of ecotourism. The vast majority of the U.S. only wants to see grizzly bears in the wild, not as wall hangings or floor rugs. It's your responsibility to protect these amazing animals, not to sell them for trophy hunting. Additionally, the science is clear that delisting is premature and that grizzly bears have not fully recovered in the Greater Yellowstone Ecosystem. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupies an insignificant proportion of their pre-settlement range. If anything, grizzly bears need additional protections, not less. Please keep Greater Yellowstone grizzly bears on the Endangered Species List.	FWS-R6-ES-2016-0042-0644

Delisting the Greater Yellowstone grizzlies now would be premature. Key issues are: One of the slowest reproductive rates among land mammals, small average litter size, and long interval between littersChanges in the food supply: The whitebark pine forest is already 70-80% gone in the GYA due to non-native fungal disease and climate-driven bark beetle attacks; cutthroats have been all but wiped out by exotic lake trout (a deep-water fish unavailable to bears). Moths, which grizzlies eat by the pound, are subject to climate change and pesticides at lower elevations. This leaves meat-primarily elk-which bears shift to as other food sources disappear. More bears are dying as they increasingly use meat (livestock and	Population Parameters	I am writing in OPPOSITION to the removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from ESA listing. Delisting the Greater Yellowstone grizzlies now would be premature. Key issues are: One of the slowest reproductive rates among land mammals, small average litter size, and long interval between litters Changes in the food supply: The whitebark pine forest is already 70-80% gone in the GYA due to non-native fungal disease and climate-driven bark beetle attacks; cutthroats have been all but wiped out by exotic lake trout (a deep-water fish unavailable to bears). Moths, which grizzlies eat by the pound, are subject to climate change and pesticides at lower elevations. This leaves meat-primarily elk-which bears shift to as other food sources disappear. More bears are dying as they increasingly use meat (livestock and hunter-killed carcasses) to replace traditional food sources, and come into more conflict with ranchers and hunters as a result. Habitat expansion and connectivity obstacles Immediate trophy hunting in all three states (Montana, Idaho, and Wyoming). With an estimated 717 bears-down from some 750 in 2014- conservationists advise a precautionary approach, particularly in light of the 55 conflict-related bear mortalities in the past year (and four orphaned cubs sent to zoos, bringing the loss of bears to 59), and the frighteningly low minimum population number of 600 proposed by the U.S. Fish & Wildlife Service.	FWS-R6-ES-2016-0042-0661
Only the smallest core habitat is in a protected area, the park. The increasing pressure on the remaining wild ecosystem by development on the periphery of the park and elsewhere in the region is not conducive to complacency about the ability of the population to continue to do well, even under the existing protections.	Population parameters	I strongly oppose the delisting of the Yellowstone ecosystem grizzly population, for the following reasons: 1. Only the smallest core habitat is in a protected area, the park. The increasing pressure on the remaining wild ecosystem by development on the periphery of the park and elsewhere in the region is not conducive to complacency about the ability of the population to continue to do well, even under the existing protections. 2. The habitat is still marginal for food sources, and the climate crisis is only going to make the situation worse. 3. Idaho and Wyoming are insane as far as wildlife protection, especially predator protection, is concerned. I wouldn't trust them for a minute with the management of an animal as irrationally hated in those states as the grizzly. Please withdraw this proposed regulation and continue to manage grizzly populations as they are managed today.	FWS-R6-ES-2016-0042-0743
The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the, current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality.	Population parameters	In an isolated, island ecosystem like Yellowstone, once the number of dead bears greatly exceeds the number of cubs born, you're headed toward extinction. Here are the current stats: The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the, current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bearsan accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality. Delisting the Yellowstone grizzlies will make them very easy for anyone to kill; without federal protection, their bearish lives will be made expendable. Another imperiled category of grizzlies are those who wander far from Yellowstone, attempting to link up with bear populations south of Glacier National Park. This connectivity is absolutely necessary for the longtime survival of Yellowstone's biologically-isolated grizzly bear population. Young male bears are often the first to begin this journey (which is essential for genetic viability), followed by female grizzlies whose presence constitutes true colonization of new habitats. Yet these bold, indispensable animals will be shot on sight. Global warming, which the FWS denies has any effect at all on the lives or futures of grizzlies, is in itself sufficient reason to never delist the Yellowstone grizzly. For one thing, the region can likely expect a terrifying drought. But climate change has already proven a disaster for grizzlies. For millennia, the park's grizzlies have fed on nuts from the whitebark pine. The nut is highly nutritious and mother grizzlies who eat pine nuts have more cubs and better survival rates. Whitebark pine forests grow at high elevations in remote places, and so serve to separate vulnerable young and mother bears from armed hunters at lower altitudes outside the park during hunting season.	FWS-R6-ES-2016-0042-0747
Excessive, unsustainable mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection. x Removing T&E protection and placing it in the hands of the three states of Idaho, Montana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered.	Population Parameters	Do not delist the Grizzly Bear. It requires if anything expanded, not minimized protection. There are five main reasons for this I would like to highlight but if I could write more, I could list several more reasons why this is not just a bad, but immoral action. 1. Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high-elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Rule cavalierly dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. 2. Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase numbers in the ecosystem (ref. Fig. 1 p 13180, of the Rule). An alternative hypothesis is that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. The alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population. This alternative hypothesis must be fully explored to satisfy the requirement for "best science" as required by law. 3. Excessive, unsustainable mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection. Removing T&E protection and placing it in the hands of the three states of Idaho, Montana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. 4. Genetic viability The Greater Yellowstone grizzly population is isolated from all other grizzly populations. This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly population is seriously flawed and violates the requisite principle of "Best Science." 5. Population Estimates Accurately estimating the number of bears in a large, rugged area like the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review.	FWS-R6-ES-2016-0042-0742
The reproduction rate of the grizzly is slow and without the necessary food sources to make it through hibernation there will be fewer births. If you consider this in conjunction with the amount of bears each state is going to be allowed to be hunted, the number of bears that will inevitably be killed because due to ranchers seeing them as a threat to their livestock, the current population of bears will not stand the reduction without grave consequences.	Population parameters	I strongly OPPOSE the delisting of the GYE grizzlies. The grizzly is facing losses of some of their key food sources such as the white bark pine. This has been studied and the concerns of loss of these foods has been supported by the Ninth Circuit Court of Appeals, Federal District Judge Molloy. The cutthroat trout are also diminishing due to the introduction of non native species causing 2 of the grizzlies main food sources to scarce. With these food supplies short they must look elsewhere for new foods to replace these. With no protections outside the park they will not have the habitat needed to establish new food sources. The lack of food sources is what cause the very few and far between encounters with ranchers livestock. The adjoining states have already said and have it in their plans to allow killing of any grizzlies who pose a threat to their livestock. The reproduction rate of the grizzly is slow and without the necessary food sources to make it through hibernation there will be fewer births. If you consider this in conjunction with the amount of bears each state is going to be allowed to be hunted, the number of bears that will inevitably be killed because due to ranchers seeing them as a threat to their livestock, the current population of bears will not stand the reduction without grave consequences. The citizens of the united states have paid for the protection of these bears. Your office has been charged with the duty of safe guarding these bears and delisting them without more thought and planning for the delisting will certainly put them back in an endangered state. The areas which border the GYE is becoming more heavily populated. With the encroachment of development the bears have very little space in which to travel from one population to another for breeding. If there are no safe guards for the bears to migrate to other areas the population will be trapped, this again brings them to the point of being endangered. There is no reason for hunting a bear other than sport and the money the states have proposed to charge for the hunting of this prized animal will in no way cover the cost the tax payers have already paid to protect that bear. It just doesn't make sense. The ranches are compensated by the numerous willing organizations for the loss of any animal killed by a bear. So it is not like the grizzlies are out there destroying herds of cattle. In fact as per your own studies the losses of ranchers has been minimal, and the ranchers do not lose money. At the very least the Primary Conservation area should be increased to include bear corridors, and am ample area around the entire GYE for the bears. Encounters with bears for people are rare, and most of those have proven it was not the bears fault, but the people's; regardless those bears have been killed. If people are going to go into bear country and not be prepared it is their fault and the entire population of bears should not have to pay the price for human stupidity. If you allow the states to openly place and advertise these great bears can be shot for a trophy what are you saying about your plan and your entrusted duty to safe guard the animals of our great parks and country. The states of Wyoming and Idaho allow for baiting of bears. They are saying it will not be allowed for the grizzly but it is not in their plan and when someone baits a black bear and a grizzly shows up that someone will shoot it and claim they thought it was a black bear. The current grizzly population cannot withstand these additional killings. The grizzly was placed on the endangered species list and should remain so. There is no unified plan that has been submitted and approved by the people of each state to manage these bears. The states each have their own management plans but do not take into consideration the number of bears that will be allowed to be killed by the other states. There are no controls, there is no cohesion in the states management plan. There is no rush to delist, there are to many threats out there for the bears food sources, impacts of climate change. I oppose the delist.	FWS-R6-ES-2016-0042-0739
The population is minimal at present, particularly when considering genetics and females.	Population parameters	I oppose delisting of the grizzly bear in the GYA, as I anticipate the bear would suffer immediate setbacks. As the human population is only increasing and will continue to increase into the future, the loss of habitat coupled with increased human conflicts and associated mortalities will only increase. The population is minimal at present, particularly when considering genetics and females. The likelihood for corridors to link the GYA bears with bears in other ecosystems is remote and will continue to decline. Increased mortalities will normally result in a greater number of lost females that would no longer contribute offspring. Any of the scientists involved with the IGBST know there is uncertainty in the outcome of delisting the grizzly bear. Why take the chance of screwing something up that has taken so long to establish? I urge USFWS to withdraw from their continued efforts to delist the grizzly bear.	FWS-R6-ES-2016-0042-0744

6) There is no nearby grizzly population in the Selway Bitterroot area in Idaho.	Population parameters	I am against the removal of the Greater Yellowstone Grizzly Bear Population from the Federal List of Endangered and Threatened Species for the following reasons: 1) Climate Change is impacting the ecosystem - reducing white-bark pine nuts available to grizzlies. 2) Climate Change is impacting and altering the ecosystem in ways that we do not foresee. 3) Human population growth and urban development infringes on habitat and connectivity between populations. 4) Disease can spread through a small population and reduce the population significantly and/or cause extinction - such as has occurred with Tasmanian Devil (Devil facial tumor disease). 5) There is no protected natural connectivity to the Selway Bitterroot area in Idaho. 6) There is no nearby grizzly population in the Selway Bitterroot area in Idaho. 6) Delisting will allow trophy hunting of the grizzly bear - which is a thoroughly disgusting and self centered pastime.	FWS-R6-ES-2016-0042-0727
These animals, the second-slowest reproducing land mammals on the North American continent,	Population parameters	I strongly oppose delisting the Grizzlies who live in Yellowstone from the endangered/threatened wildlife list. These animals, the second-slowest reproducing land mammals on the North American continent, are deeply threatened already by the human activity that has led to climate change and drastically affected availability of the whitebark pine's nuts, which grizzlies have relied on for millennia. As human habitation threatens grizzlies' ability to successfully move between protected habitats (e.g., Yellowstone to grizzly-habitats south of Glacier National Park) it would be deeply wrong and tragic for FWS to make it easier for trophy-hunters to slaughter these apex predators for sport. Humans have encroached upon more than enough grizzly habitat. Do not permit those who want to hang grizzly heads on their walls or tramp on grizzly skin rugs to encroach further.	FWS-R6-ES-2016-0042-0762
Delisting the grizzly bears of the Greater Yellowstone Ecosystem can cause harm to the species. It has taken decades for the species to increase from a population of just over a hundred, to around 700. The increase in the number of grizzly bears may seem substantial, but it does not compare to the amount of grizzlies that roamed before they began to be hunted in the 1800s. The grizzly bears should remain on the Endangered Species List until their numbers increase to an amount that can be considered self-sustaining.	Population parameters	Delisting the grizzly bears of the Greater Yellowstone Ecosystem can cause harm to the species. It has taken decades for the species to increase from a population of just over a hundred, to around 700. The increase in the number of grizzly bears may seem substantial, but it does not compare to the amount of grizzlies that roamed before they began to be hunted in the 1800s. The grizzly bears should remain on the Endangered Species List until their numbers increase to an amount that can be considered self-sustaining. Removing them from the list at this point would require significant monitoring and regulations that are already being implemented by the Endangered Species Act. The risks for the survival of the species increase when we consider that grizzlies are one of the slowest reproducing mammals. They typically do not reproduce until they are at least 4 or 5 years old. Grizzlies do not mate until the months between May and July. The female has to ensure that she gains enough weight during the summer so that the implantation of their eggs in the uterus occur between October and November. If she does not gain enough weight, the implantation may not occur. If the female is able to implant her eggs, then she will carry the cubs and give birth to an average of about 2-3 cubs. If hunting is made possible again there might be fewer grizzlies being born than the amount of number of grizzlies that are being killed. By removing the grizzly bears from the list, we would be removing a dominant species in the ecosystem. Other parts of their ecosystem will be harmed. Grizzlies are known to be omnivore, which signifies that a major removal of the grizzly population may alter many different types of plants, which could then harm other wildlife that are part of this ecosystem. If the grizzlies can be hunted outside of the national parks, we are placing the grizzlies that live outside of the parks in danger. States like Montana, Idaho, and Wyoming would have to manage their hunting regulations. The individuals in the states might ignore rules and regulations, and this might cause the population of grizzlies to decline rapidly. We would then be left where we initially were, adding the grizzly bear species to the Endangered Species List. Instead, the communities that surround the living areas of the grizzlies should be educated about the importance of keeping this species alive. They should be educated about techniques that they can use when they come across grizzly bears. Once an animal is placed on the endangered species list, even if the animal population recovers to a certain degree, hunting it should not be allowed again.	FWS-R6-ES-2016-0042-0784
The risks for the survival of the species increase when we consider that grizzlies are one of the slowest reproducing mammals. They typically do not reproduce until they are at least 4 or 5 years old. Grizzlies do not mate until the months between May and July. The female has to ensure that she gains enough weight during the summer so that the implantation of their eggs in the uterus occur between October and November. If she does not gain enough weight, the implantation may not occur. If the female is able to implant her eggs, then she will carry the cubs and give birth to an average of about 2-3 cubs. If hunting is made possible again there might be fewer grizzlies being born than the amount of number of grizzlies that are being killed.	Population parameters	Delisting the grizzly bears of the Greater Yellowstone Ecosystem can cause harm to the species. It has taken decades for the species to increase from a population of just over a hundred, to around 700. The increase in the number of grizzly bears may seem substantial, but it does not compare to the amount of grizzlies that roamed before they began to be hunted in the 1800s. The grizzly bears should remain on the Endangered Species List until their numbers increase to an amount that can be considered self-sustaining. Removing them from the list at this point would require significant monitoring and regulations that are already being implemented by the Endangered Species Act. The risks for the survival of the species increase when we consider that grizzlies are one of the slowest reproducing mammals. They typically do not reproduce until they are at least 4 or 5 years old. Grizzlies do not mate until the months between May and July. The female has to ensure that she gains enough weight during the summer so that the implantation of their eggs in the uterus occur between October and November. If she does not gain enough weight, the implantation may not occur. If the female is able to implant her eggs, then she will carry the cubs and give birth to an average of about 2-3 cubs. If hunting is made possible again there might be fewer grizzlies being born than the amount of number of grizzlies that are being killed. By removing the grizzly bears from the list, we would be removing a dominant species in the ecosystem. Other parts of their ecosystem will be harmed. Grizzlies are known to be omnivore, which signifies that a major removal of the grizzly population may alter many different types of plants, which could then harm other wildlife that are part of this ecosystem. If the grizzlies can be hunted outside of the national parks, we are placing the grizzlies that live outside of the parks in danger. States like Montana, Idaho, and Wyoming would have to manage their hunting regulations. The individuals in the states might ignore rules and regulations, and this might cause the population of grizzlies to decline rapidly. We would then be left where we initially were, adding the grizzly bear species to the Endangered Species List. Instead, the communities that surround the living areas of the grizzlies should be educated about the importance of keeping this species alive. They should be educated about techniques that they can use when they come across grizzly bears. Once an animal is placed on the endangered species list, even if the animal population recovers to a certain degree, hunting it should not be allowed again.	FWS-R6-ES-2016-0042-0784
As you know, grizzlies were delisted back in 2007 but a lawsuit filed by environmentalists influenced a federal judge to overturn that ruling. Many who oppose delisting grizzly bears now are more opposed to state-based management control than they are opposed to the actual delisting. There is an obvious movement afoot to do away with states managing wildlife by the moreradical voices of environmentalists. The Yellowstone grizzly population has reached all three criteria for delisting: at least 500 bears (reached in 2001), required distribution in 16 of 18 Recovery Bears	Population Parameters	As you know, grizzlies were delisted back in 2007 but a lawsuit filed by environmentalists influenced a federal judge to overturn that ruling. Many who oppose delisting grizzly bears now are more opposed to state-based management control than they are opposed to the actual delisting. There is an obvious movement afoot to do away with states managing wildlife by the more radical voices of environmentalists. The Yellowstone grizzly population has reached all three criteria for delisting: at least 500 bears (reached in 2001), required distribution in 16 of 18 Recovery Bear Management Units (reached in 1999), and maintaining a population of 600-747 bears while maintaining mortality limits for independent females, males and dependent young. Hunters and anglers who purchase licenses so far contributed millions to grizzly bear recovery efforts in the Greater Yellowstone Ecosystem. This is a testament to how sportsmen and women pursuing their passions help fund other important wildlife programs. As per above, I fully support the delisting of grizzlies in the Yellowstone population.	FWS-R6-ES-2016-0042-0798
There really aren't that many Grizzlies in the Yellowstone area. Certainly many think that there are way too many and that hunting will help keep their populations in check. The resurgence of the Grizzly Bear over the past decades has been significant and credit must be given to the federal government for this. But Grizzly Bear population is currently declining. Maybe this is part of a natural cycle and if left alone, their numbers will recover. But with all of the current environmental pressures, making the decision to de-list the Grizzly Bear will rapidly hasten the declining numbers.	Population parameters	Removing the Grizzly Bear from the endangered species list is a mistake that will ensure the need to relist this magnificent predator. I believe that the decision is not based on sound scientific information, but rather on the pressure of political entities. Because it is not defensible to make such important decisions based on political pressure, science is manipulated and misinterpreted to develop convenient findings to support the political decision. Predators play an overwhelmingly important role in the health of our ecosystems. However, throughout the history of the United States, our government and the general public have fostered a deep seated fear and demonization of predators, especially the large predators. This is evidenced by the near eradication of the Grizzly Bear and wolves and the widespread hatred of an essential species. Fear of predators has been institutionalized and the elimination of predators sold as a necessary program to protect protect livestock, and the western way of life. However, it doesn't take much effort to see the damage that such programs have on our ecosystems and the other problems that arise when predators are reduced to unsustainable population levels. Wildlife management decisions are too often based on the need to generate revenue and a perceived notion that large predators diminish our enjoyment of hunting big game species such as mule deer, elk. Certainly predators kill these species, but if we would allow the natural cycles of predators and game species to occur, we would find that our hunting would improve over time. We have created a hunger for revenue generated by the marketing of permits to kill large predators such as Grizzlies. What could stoke the prestige and ego more than shooting an evil killing machine as notorious as the Grizzly. Unfortunately, wildlife management decisions regarding the hunting of predators are often made with incomplete knowledge about the numbers of animals, the limiting effects of diminished habitat and the isolation of specie populations. Certainly climate change is having a negative impact on our wildlife but the political nature of this type of environmental deterioration is not taken into account. It is no secret that changing winter conditions in the northern Rockies is having a devastating impact on our forests. I have seen a significant change in the overall health of forests in the Sawtooth Mountains in Idaho. Most people might be surprised that a vital source of nourishment for the carnivorous beast, the Grizzly Bear, are pine nuts. Climate change has led to the rapid decline of the white bark pine and its production of nuts which are essential to the Grizzly. Wildlife managers have not given this fact enough weight in their decision making. After all, Grizzlies are carnivores, living by eating our precious game animals. Well, it is not so easy to replace an essential food source as important as the white bark pine nut is to the Grizzly. Imagine the impact on our food options if corn or wheat production was drastically reduced by some disease. Other important sources of nourishment for the Grizzlies are also experiencing declines putting further pressure on Grizzly survival. There really aren't that many Grizzlies in the Yellowstone area. Certainly many think that there are way too many and that hunting will help keep their populations in check. The resurgence of the Grizzly Bear over the past decades has been significant and credit must be given to the federal government for this. But Grizzly Bear population is currently declining. Maybe this is part of a natural cycle and if left alone, their numbers will recover. But with all of the current environmental pressures, making the decision to de-list the Grizzly Bear will rapidly hasten the declining numbers. The Yellowstone ecosystem is in many ways a geographical island. Genetic diversity is essential for the sustainability of healthy species. Because of the relative isolation of large predators such as Grizzlies in Yellowstone, it is difficult to maintain a diverse gene pool. Hunting outside of the Park will make it even more difficult, adding another significant constraint on the sustainability of a healthy Grizzly Bear population. Although the Grizzly Bear population has grown over time and can be trumpeted as a successful conservation effort, de-listing the Grizzly Bear at this time will rapidly destroy that legacy and put one of our largest predators in unnecessary peril and fighting for survival. Thank you for your consideration.	FWS-R6-ES-2016-0042-0750

Trophy hunters would also kill female grizzlies, the reproductive engines of the ecosystem. Even if state game departments say, don't shoot bears with cubs at their side, a hunter need only claim he didn't see the little bears. Additionally, even experts can't unfailingly tell an adult female grizzly bear from a solitary male of equivalent size.	Population parameters	The only certain outcome of delisting the Yellowstone grizzly bear is that it will result in trophy hunting of bears by the states of Wyoming, Montana, and Idaho. After spending a federal fortune each year since 1975 to bring the grizzly back from near extinction, we're now poised to abruptly begin killing them off for the bargain price of a hunting license. Why this fierce madness to kill our largest carnivore? I am a hunter who doesn't buy into the fatuous claims about the need to kill carnivores. Apex predators serve a complex and necessary role in ecological communities and in their own wild social communities. America's great bears today threaten our minds more than they do our bodies; by reminding us upon occasions still possible today, we mighty humans were once just another flavor of meat. They challenge our notion of how we fit into the world and our dominion over it. And that's why we need them alive and roaming the land. A trophy hunt for grizzlies could begin, if we don't stop it, as early as next year. The danger is simple: In an isolated, island ecosystem like Yellowstone, once the number of dead bears greatly exceeds the number of cubs born, you're headed toward extinction. Here are the current stats: The feds say about 700 grizzlies live in and around the park. But the growth of that grizzly population has leveled off; the current population estimate is down 6 percent from 2014. Mortality from all causes (natural deaths, management, road-kills, poaching, defending livestock), as reported by the government, was 59 dead grizzlies in 2015. Reported mortality is about half of actual dead bears accepted rule of thumb. Start adding in the number (one estimate is 72) of bears who will be shot in the trophy or sport hunt and you could end up with 200 dead grizzlies in a single year. Even a current population of 700 grizzly bears would be doomed to extinction by that much mortality. There is a very dark side to this lust for killing top carnivores. The first and easiest grizzlies to be killed will be the roadside bears of Yellowstone and Grand Teton national parks. These loved and most photographed bears have little fear of humans since wildlife is protected in national parks. Thousands of park visitors have thrilled over viewing grizzly bear families (mother bears with young are more frequent along roads). One famous mother grizzly, known as number 399, is now in hibernation but frequents roadways in Grand Teton. A Jackson Hole, Wyoming, outfitter has reportedly pledged that this is the first bear he would target: "because he hates federal government, bear-loving environmentalists and the Endangered Species Act," according to journalist Todd Wilkinson. Last year, during the furor over the killing of Cecil the African lion, Yellowstone park officials decided to kill another famous mother bear who had fatally mauled a photographer, and send her cubs to live in a zoo. The American public unloaded a ton of fury on the park's superintendent. There is more: Delisting the Yellowstone grizzlies will make them very easy for anyone to kill; without federal protection, their bearish lives will be made expendable. Witness how the only agreement by the three states is how they divide the spoils of Yellowstone into three piles of dead bears. The unmistakable message is that the only measure of value of these magnificent animals is as a head on the wall or a rug on the floor. Of the reported 59 grizzlies killed in 2015, more than half were killed in interactions with hunters who mistook grizzlies for black bears or shot them just because they imagined themselves threatened. There has been virtually no penalty or fine for illegally killing a grizzly, even though serious penalties exist on the books. Even blatant poaching is dismissed with barely a swat on the wrist. Trophy hunters would also kill female grizzlies, the reproductive engines of the ecosystem. Even if state game departments say, don't shoot bears with cubs at their side, a hunter need only claim he didn't see the little bears. Additionally, even experts can't unfailingly tell an adult female grizzly bear from a solitary male of equivalent size. Global warming, which the FWS denies has any effect at all on the lives or futures of grizzlies, is in itself sufficient reason to never delist the Yellowstone grizzly. The federal government is not impressed by climate change and clearly states global warming is not a threat to grizzlies today or in the future. The FWS remains adamantly chained to this delusional stance despite a legal requirement to use "the best available science." In a recent lawsuit over wolverines, Climate change is a black hole of uncertainty for all species. Aside from the fact that it's coming to get us, nothing is sure.	FWS-R6-ES-2016-0042-0779
These decisions should NOT be left to animal rights activists as evidenced by how they have caused game and wildlife management problems with the introduction of grey wolves and thrown lawsuit after lawsuit in the way of state wildlife management agencies long after the previously agreed upon sustainable numbers had been reached. As a result of their overzealous actions to allow wolf populations to grow unchecked, these predators have since spread to many more states and areas that were not intended to have them, such as Oregon, Washington, Idaho and now even Colorado. The problems these unmanaged predators have caused to elk, deer, moose and other game animals, as well as the destruction of livestock by the wanton "sport hunting" wolves are known to perpetuate are too numerous to list here. That said, delisting Grizzly Bear and NOT allowing animal rights activists to prevent them from being properly managed should not be considered.	Population parameters	As an avid hunter and outdoor activity proponent I very strongly support the delisting of Yellowstone Grizzly Bear so they can be managed like all wild game animals should be. Just like elk, deer, moose, mountain lion and other wild game, Grizzly Bear (and wolves too for that matter) should be managed by the respective state game management entity so a balanced predator/prey environment can be more effectively achieved for the benefit of all species and the habitat they live in and live off of. This will also benefit the hunting community by allowing all game animals to have a better chance to thrive with balanced and sustainable numbers for all. These decisions should NOT be left to animal rights activists as evidenced by how they have caused game and wildlife management problems with the introduction of grey wolves and thrown lawsuit after lawsuit in the way of state wildlife management agencies long after the previously agreed upon sustainable numbers had been reached. As a result of their overzealous actions to allow wolf populations to grow unchecked, these predators have since spread to many more states and areas that were not intended to have them, such as Oregon, Washington, Idaho and now even Colorado. The problems these unmanaged predators have caused to elk, deer, moose and other game animals, as well as the destruction of livestock by the wanton "sport hunting" wolves are known to perpetuate are too numerous to list here. That said, delisting Grizzly Bear and NOT allowing animal rights activists to prevent them from being properly managed should not be allowed or tolerated. If man is going to be involved in managing wildlife then excluding certain species, regardless of their being predator or prey, is just wrong. Man should either manage all or manage none. Managing none is not a wise choice based on history and the near wipe-out of species in our nation's early history. Hunters in general have become the conservationists with the most vested interest in preserving wildlife and raising money to do so. In contrast animal rights activists don't even come close.	FWS-R6-ES-2016-0042-1162
My family has grazed in the Upper Green River, on the Bridger-Teton National Forest, for well over 100 years. We have persisted in spite of the long trail, bureaucrats, and grizzly bears. At no time in the history of the Upper Green River Cattle Association, of which my family was a founding member 100 years ago this year, has depredation from large carnivores, especially grizzlies, been so pervasive. In 1993, our association saw its first grizzly kill in a generation, and in 2015 members of the association saw 80 head of livestock confirmed by Wyoming Game and Fish personnel as killed by grizzly bears. In 2015, this association lost more nearly 14% of its calf crop, or 290 calves, to natural causes and predation. This level of predation is unprecedented.	Population parameters	I submitted comments earlier in the process, but wish to do so again, as I have other issues to present. My family has grazed in the Upper Green River, on the Bridger-Teton National Forest, for well over 100 years. We have persisted in spite of the long trail, bureaucrats, and grizzly bears. At no time in the history of the Upper Green River Cattle Association, of which my family was a founding member 100 years ago this year, has depredation from large carnivores, especially grizzlies, been so pervasive. In 1993, our association saw its first grizzly kill in a generation, and in 2015 members of the association saw 80 head of livestock confirmed by Wyoming Game and Fish personnel as killed by grizzly bears. In 2015, this association lost more nearly 14% of its calf crop, or 290 calves, to natural causes and predation. This level of predation is unprecedented. We are excited to see that the grizzly bear may, once again, be delisted from the Endangered Species Act, and that management authority could return to the state of Wyoming. The Wyoming Game and Fish Department (WGFD) have been instrumental in supporting the recovery of this iconic species, and they have been great partners with our association through the thick and the thin of grizzly recovery. Without the compensation program initiated by the WGFD, most of us grazing cattle in the Upper Green would no longer be there, ending a 100 year tradition. Individual members of the WGFD have worked tirelessly, even 24/7, to resolve conflict issues when grizzlies kill livestock. In the past four years on the Upper Green River Cattle Allotment, confirmed depredations caused by grizzly bears have increased from 20 in 2010 to 80 in 2015. Since 1995, there have been over 500 head of cattle confirmed to have been killed by grizzly bears on this allotment. I fully support delisting of this species, as they have met every recovery goal ever established, and there have been several. Further, I support sport hunting of this species in areas like the Upper Green, where substantial conflict exists. I support management flexibility to address individual bears, not just numbers in a matrix. The Upper Green is in the Designated Monitoring Area (DMA), and the DMA was created to be an area both biologically suitable and socially acceptable for grizzly expansion. I have fought against the inclusion of the Upper Green in this grizzly management area, because the level of conflict that exists there is not socially acceptable to those of us making a living there. I ask that the Upper Green be removed from inclusion in the DMA. If the DMA is actually an area that is biologically important to grizzly bear recovery, then designate it such, but this area does not qualify as being socially acceptable for grizzly bears. The PCA was designated early on to be that area essential for grizzly bear recovery, and it has served that purpose well, as grizzlies have expanded great distances beyond the PCA. I am concerned that land use restrictions that have been put in place in the PCA, will be pushed throughout the DMA. I do not believe that is appropriate. How will the DMA boundary be amended in the future, as there is no process in place? If the states live up to their part of the bargain, and grizzlies continue to meet delisting requirements for the five year period that a conservation strategy is designed to exist for, can the DMA boundary be changed? USFWS should only retain management control for the five year period after the grizzly is delisted, then the states should have full management authority, unless the population demographics are not maintained. Why is there no physical description of the DMA in this proposed federal rule? Albert Sommers	FWS-R6-ES-2016-0042-1222
I agree with the Federal Register announcement of March 11; 2016, Grizzly bears in the GYE have reached great enough population numbers to no longer meet the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). Per the announcement, occupied range has more than tripled in size.	Population parameters	The Fremont County (Idaho) Farm Bureau (FCFB) strongly supports Grizzly bear delisting under Docket No. FWS-R6-ES-2016-0042. The FCFB is one of 37 county Farm Bureaus comprising the Idaho Farm Bureau Federation, whose combined membership is over 73,400 member families throughout the state. FCFB members live on the eastern edge of the Greater Yellowstone Ecosystem (GYE) and are directly impacted by Grizzly bears and the regulations surrounding them. I agree with the Federal Register announcement of March 11; 2016, Grizzly bears in the GYE have reached great enough population numbers to no longer meet the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). Per the announcement, occupied range has more than tripled in size. Local officials say the range is fully occupied and young or transient bears encounter difficulty in establishing their own home ranges. The states of Wyoming, Idaho and Montana requested delisting the GYE Grizzly bear population and are working on post-delisting management plans. FCFB supports these efforts as well as the delisting of the GYE Grizzly bear population. Thank you for the opportunity to express my support for Docket No. FWS-R6-ES-2016-0042.	FWS-R6-ES-2016-0042-1199

In 2015, approximately 70 bears died. This represents about 10% of the total population for the slowest reproducing mammal in North America. This mortality rate is not sustainable. The 10% rate occurred even with federal protection of the Threatened and Endangered Species act. Removing such protection and placing it with Idaho, Montana, and Wyoming is incompatible with a sustainable population. These three states have clearly demonstrated hostility to co-existence with large carnivores and seem to view them only as unwanted pests or a commodity for revenue through hunting licenses, etc. Demonstrated, real-world sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. A	Population Parameters	I oppose delisting of the Yellowstone population of grizzly bears. The species should not be removed from the Federal List of Endangered and Threatened Wildlife. In 2015, approximately 70 bears died. This represents about 10% of the total population for the slowest reproducing mammal in North America. This mortality rate is not sustainable. The 10% rate occurred even with federal protection of the Threatened and Endangered Species act. Removing such protection and placing it with Idaho, Montana, and Wyoming is incompatible with a sustainable population. These three states have clearly demonstrated hostility to co-existence with large carnivores and seem to view them only as unwanted pests or a commodity for revenue through hunting licenses, etc. Demonstrated, real-world sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Climate change effects on Yellowstone's grizzlies are dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. Four critical foods make up the diet of grizzlies in the Yellowstone ecosystem: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. The expanding range of Yellowstone's grizzlies is depicted in The Rule as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). A more reasonable hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement for "best science" as required by law. The grizzly population of the Yellowstone ecosystem is isolated from all other grizzly populations (pp. 13190-13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Accurately estimating the number of bears in the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review. There has been a lack of transparency about making taxpayer funded data (for which the IGBST have maintained an exclusive monopoly) available for scrutiny by the larger scientific community. All raw data on grizzly bears collected by government agencies should be made available to independent scientists. In view of the wide disagreement about delisting decisions, the USFWS should establish a review panel of independent, academically qualified scientists who are not involved in current grizzly bear research in the GYE.	FWS-R6-ES-2016-0042-5355
As anyone who works in science and law enforcement can tell you, the amount of "Shoot, shovel, and shut up," has an already significant impact in every aspect of wildlife.	Population parameters	It is with great sadness and frustration to hear about the possible de-listing of grizzly bears in the greater Yellowstone eco-system. First I would like to address the issue from the perspective of a native of Wyoming. My life began on a large ranch nestled along the Beartooth Mountains reaching into Sunlight Basin north of Cody. WY close to the Montana border. During my childhood, I encountered an extraordinary plethora of wildlife including the grizzly. My parents taught me the value and necessity of living with, not against nature. In order for humanity to have a connection to the earth, there must be respect and love for all things wild and free. Predation was a part of doing business as a rancher and if you were not smart enough or creative enough to deal with predators, then you had no business being a rancher. And true to their wisdom, we experienced very little predation. More livestock was lost to injury and illness than wildlife predation. Throughout all my childhood years, I learned to understand wildlife and respect their ways. Ultimately learning how to alter my own behavior in order to interact safely. Not a hardship, sometimes a short delay or detour, but nothing that would ever cause my parents a willingness to take the life of a bear, coyote, cougar, bobcat, fox, etc. for convenience's sake. Fast forward to my life as a wildlife biologist and it is with a grateful heart that they taught me the value of all nature and it's ways. It is from their lifelong commitment to harmony, balance, and respect for all life that I long to protect the last vestiges of the wild. It is poor science that calls for the slaughter of these magnificent creatures. And slaughter it will be. Montana's plan is to charge only \$50 for in state licenses and a \$1,000 for out-of-state. These low costs will ensure their decimation, not to mention the fact that they are not used to being hunted making them an easy target. The time it takes for them to mature sexually and only reproduce every two to three years will greatly increase their reduction should de-listing occur. Their value is far greater alive than on someone's wall or under their feet. I recall a funny comment made to Yellowstone rangers about training the bears better so that visitors will be able to see them. Not so funny when you think about how much money wildlife engenders for the park and the surrounding businesses. And bears are iconic, everyone who enters a park where they remain wish to see one and to feel their wildness. There is no good reason to de-list these bears and especially not for political maneuvering. It is our responsibility, collectively to keep these icons safe. As anyone who works in science and law enforcement can tell you, the amount of "Shoot, shovel, and shut up," has an already significant impact in every aspect of wildlife. We must not allow the wanton destruction of grizzlies a further opportunity to take hold. Stand firm in choosing to retain the grizzly on the endangered species list where they at least have some protections. Thank you for your time and consideration.	FWS-R6-ES-2016-0042-5376
I feel the good increase in both the number of bears and the expansion of their locations show they have reached the level where they can be managed and a population maintained by the WY Game and Fish.	Population parameters	It is time to delist the grizzly bear in Wyoming. As a member of the Wyoming legislature serving of the committee that oversees the WY Game and Fish I have been involved with the grizzly bear management. We have witnessed the growth in the population over the past ten years. I feel the good increase in both the number of bears and the expansion of their locations show they have reached the level where they can be managed and a population maintained by the WY Game and Fish. The Wyoming Game and Fish have shown they have the manpower and resources to monitor the grizzly bear population and manage them for the benefit of all concerned. I have also hunted elk and big horn sheep in the Yellowstone drainage for many years and seen the numbers of grizzly bears increase from maybe seeing a grizzly to how many do we see during the hunt. The number of human and grizzly encounters have constantly risen. Also the domestic animal grizzly bear conflicts have continually risen which is big concern to our livestock producers. Your following through with your plan to delist, for the many reasons people are bringing up and also your own finding do demonstrate it is time to delist this great animal. thanks for your consideration. Allen Jaggi Wyoming outdoorsman Wyoming Legislature House District # 19	FWS-R6-ES-2016-0042-1235
Grizzlies have low reproductive rates, and are already feeling pressures from habitat fragmentation, human pressures, and a decline in their food sources such as wild ungulates, fish and other prey species.	Population Parameters	Please keep protections for all 650 Grizzly Bears that remain in the Yellowstone area. If protections are lifted, they will surely be exterminated by people who will flock from all over the world for trophy hunting. Grizzlies have low reproductive rates, and are already feeling pressures from habitat fragmentation, human pressures, and a decline in their food sources such as wild ungulates, fish and other prey species. If protections are lifted, they will inevitably be pushed to the brink of extinction. They have already been exterminated from 95% of their historic range, and instead of de-listing, more studies should be done to allow them to occupy their historic range. Due to human pressures, Grizzlies are already confined to the "recovery ecosystems" if protections are removed, Yellowstone bears could be confined to extinction within our lifetimes. A Grizzly gallbladder can sell for up to \$10,000 on the black market, and the larger the gallbladder, the higher the price and in Korea, as much as \$15,000. The demand for people to kill them is extremely high and with only a few isolated populations these bears need to be protected and allowed to roam free without fear of being killed. In the Salmon River Watershed in California, one large family decimated a bear population by killing more than 200 bears (likely for the gall bladders) in one season. "It's hard for any enforcement agency to get a handle on wildlife crime. Unlike crimes against people [who report them], you usually have to catch a poacher or trafficker in the act," said Sandy Cleve, spokesperson for the U.S. Fish and Wildlife Service's Office of Law Enforcement. Please extend the comment period so that we can adequately study and offer better solutions for increasing biodiversity during this time of one of the largest extinctions on the face of the planet.	FWS-R6-ES-2016-0042-1247
I oppose allowing trophy hunting of bears. This type of hunting has far more to do with economic opportunism than bear management. The states of MT, WY and ID have shown a strong predilection for hunting, almost as a philosophical goal, rather than necessarily the best management option. I do not support managing the GYE bear population for a target population of 674 bears, and encouraging the discretionary harvest (hunting) of	Population parameters	See Attached Attachments Weiner Gary	FWS-R6-ES-2016-0042-1229
As a long time resident of the west, I want to see the bear continue to be on the ESL in the GYE. That is until their numbers there are around 1000 in that ecosystem.	Population parameters	The grizzly bear is a key and unique species of north america. I have lived in Cook City, Silvergate, Gardiner and West Yellowstone (all in MT) over many years. I learned to love and respect the bear. I lived in WY for 30 years and now in ID for 7. I think the numbers are still low (700 out 300,000) and the intentions of many in WY, MT and ID in the Greater Yellowstone Ecosystem are to kill as many bears as possible as soon as they are off the Endangered Species List. I worked in YNP doing hiking and camping safely events teaching people how to be careful in bear country. Teaching about bear spray and helping communities get bear proof trash containers. I see this delisting the grizzly bear as a sad event. I remember when Frank and John Craighead warned the F&WS and the Park Service that changing to much bear all at once would cause great harm to the bear. Which is why they ended up on the ESL. I think the agencies are being pressured by politics and short sighted politicians. As a long time resident of the west, I want to see the bear continue to be on the ESL in the GYE. That is until their numbers there are around 1000 in that ecosystem. They need to have some DNA diversity. Also with global warming killing white bark pine, problems with yellowstone cutthroat trout numbers being devastated and moths not being as prolific (being killed off by pesticides) . I think it is reasonable and important to ensure the existence of this key species in the lower 48. I thank you for your time and attention.	FWS-R6-ES-2016-0042-1268
Their numbers are still low, their diet is disrupted by climate change. Living in a park makes them unwary of people and therefore easy marksfor hunters.	Population parameters	Please DO NOT delist grizzly bears at Yellowstone as an endangered species! Maintain Federal Protection and do not allow them to be exposed to trophy hunting! Their numbers are still low, their diet is disrupted by climate change. Living in a park makes them unwary of people and therefore easy marks for hunters. LET BEARS PERSIST! DO NOT DELIST!	FWS-R6-ES-2016-0042-1286

maintaining a stable population, without arbitrary reductions in the number of bears and a strong commitment from Montana, Idaho, and Wyoming to reduce conflicts between people and bears.	Population parameters	I am very wary of the proposal to delist the GYE population of grizzly bears from the federal list of endangered wildlife. If the delisting does indeed proceed forward, it should be done with great caution in favor of the grizzlies' continued chance of survival and thriving. I strongly support the following provisions in the delisting rule: -- protecting the bear's core habitat, with meaningful and enforceable habitat protections, including limits on development and roads. -- maintaining a stable population, without arbitrary reductions in the number of bears and a strong commitment from Montana, Idaho, and Wyoming to reduce conflicts between people and bears. -- a commitment to habitat connectivity for bear migrations and genetic diversity -- managing the GYE population as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. Grizzly bears are a magnificent creature and any ecosystem that has healthy populations of them is very fortunate on multiple levels. Where I live, in the North Cascades, the grizzlies are missing and we are working hard to get them back. Thank you for careful consideration of the above recommendations when moving forward in the GYE.	FWS-R6-ES-2016-0042-1250
Last year more than 60 bears were killed for various acceptable reasons. That number was nearly 10 percent of the total "stable" population. Grizzly reproduction is slow and it will take a few years to recover that 60 bears. Another year of 60 bears lost would put the bear right back on the list.	Population parameters	I believe that delisting the grizzly bear from endangered species will be a regrettable mistake, and allowing the hunting of bears will do damage to hunting in general. Therefore, I oppose delisting. Grizzlies are an emotional issue and killing bears for trophy rugs or mounts and leaving the meat in the field will reach an audience and raise an outcry against hunting. Note the recent MN dentist who shot the lion and paid dearly for it. The number of hunters in America is declining, but interest in wildlife is rising. The bear is a draw to visitors in Yellowstone and Glacier Parks. What hiker (or hunter) does not tell with excitement his recent encounter with a grizzly. The bear is worth more alive than the small gain for a few outfitter trips and licensing fees. And tech social communications allow a campaign against unpopular actions to grow instantly. The science states that the bears have recovered and the population is "stable". Last year more than 60 bears were killed for various acceptable reasons. That number was nearly 10 percent of the total "stable" population. Grizzly reproduction is slow and it will take a few years to recover that 60 bears. Another year of 60 bears lost would put the bear right back on the list. I attended the recent hearing in Bozeman MT on delisting and listened to all the comments. The speakers against seemed to have science based reasons and questions for opposing the delisting. The speakers for delisting all just said "the bear population has recovered, is stable and the bear should be delisted. No one supporting delisting said what would be gained by delisting. I went away from the hearing believing the issue for the delisting people is really about who has the power to make the decision about the bears future. The bear is just caught in the middle. In summary, I see very little to gain by delisting and a lot of risk. If the bear populations is stable, it shouldn't grow appreciably over the next 10-20 years and time will tell if any of the science based arguments hold water. We should just leave the Grizzly Bear alone. I have seen them hiking and hunting and it raised the quality of my time in the woods. I hope they will always be there.	FWS-R6-ES-2016-0042-1288
It is abundantly clear that the grizzly bear population has recovered to the point that delisting is appropriate.	Population parameters	I think that the grizzly bear should be delisted in the Greater Yellowstone Ecosystem and management of the grizzly bear population should be turned over to the States. It is abundantly clear that the grizzly bear population has recovered to the point that delisting is appropriate. i) The States (Wyoming Montana, Idaho, and any other relevant state) in the Greater Yellowstone Ecosystem are very well equipped to manage the grizzly bear population. Each State has been successfully managing the population of wildlife within its boundaries for over 20 years. The States' natural resources departments with the professional staff members including wildlife biologists who have the training and experience to manage the grizzly bear population within their respect boundaries. Therefore I think that the management of the grizzly bear population should be turned over to the States. ii) The failure to begin State management of the grizzly bear population at this time poses substantial public risk. Allowing the grizzly bear population to continue to grow out of control places the public visiting Yellowstone National Park at substantial risk of injury and death. The grizzly bear is a very dangerous bear that can viciously attack Yellowstone visitors with little or no provocation. I am sorry to say that most Yellowstone visitors are bear-stupid thinking that they can safely get a close up of a grizzly bear with their smartphone. Furthermore, I expect that almost all Yellowstone visitors don't have a can of bear spray with them when visiting the Park. I think that failure to delist the grizzly bear now will mean that several Yellowstone visitors will be mauled or killed by grizzly bears each year as the grizzly bear population continues to increase geometrically. iii) Grizzly bears don't have any natural predators that control their population growth. Therefore, the grizzly bear population within the Greater Yellowstone Ecosystem will increase geometrically if they are not delisted now. Almost every grizzly bear sow has 2 cubs each year, and since almost all of the cubs will survive each year, the grizzly bear population will increase essentially geometrically in the coming years. iv) Allowing the grizzly bear population to grow out of control will detrimentally impact the number of elk, deer, bison and other animals in the food chain in the Greater Yellowstone Ecosystem. Just as the wolf population has a detrimental impact on these other animals, too many grizzly bears in the Greater Yellowstone Ecosystem will exacerbate this depredation even further. Recently wolves killed over a dozen elk just for the fun of it as they could not possibly consume all of the elk they killed. I expect that will repeat with an overpopulation of grizzly bears who we know kill far to man elk calves. v) Allowing the grizzly bear population to grow out of control will detrimentally impact the cattle, sheep and other livestock in the Greater Yellowstone Ecosystem. Grizzly bears will go after the easy kills of livestock and their new babies. Not delisting the grizzly bear in the Greater Yellowstone Ecosystem will be a death sentence to an excessive livestock grazing there. Paying ranchers for livestock depredation by grizzly bears will become a substantial expense. Fools run from one extreme to another. Let's not be fools and take action now to delist the grizzly bear in the Greater Yellowstone Ecosystem. Please carefully consider my comments. Regards, Rollie Hackbart	FWS-R6-ES-2016-0042-1258
We just spent millions of dollars and it has taken 40 years to increase the bear population from 125 to 725 (demonstrating the length of time for reproduction)	Population parameters	I oppose the delisting of Grizzly Bears on the following grounds: - There are too many unknowns in climate/food source/habitat right now. - We just spent millions of dollars and it has taken 40 years to increase the bear population from 125 to 725 (demonstrating the length of time for reproduction) With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting?	FWS-R6-ES-2016-0042-1361
The main predator and reason for listing the Grizzly bear on the ESA is the human. Unfortunately, even with the â€œrecoveredâ€ population, or rising numbers of bears, researchers in the Montana state Grizzly bear proposal agree that the grizzlies still have â€œbelow reproductive rates and that grizzly population are very susceptible to human impactsâ€(5)They continue to say	Population parameters	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306
GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population.	Population parameters	Do NOT delist the Yellowstone Grizzlies! - THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - DECLINING FOOD SOURCES: Historically bears dependent on 4 food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. These states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. - GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. Sow's will be killed and Cubs left to starve or be killed by predators. Don't delist the Grizzlies. Too many of them are being killed even with protection. There is no reason to delist them. Do you really want the states to lose millions of tourist dollars? That's what will happen because millions of people come to the Tetons and Yellowstone to see the Grizzlies. If they are hunted they won't be seen in the parks like they are now. To delist them is totally wrong on so many levels.	FWS-R6-ES-2016-0042-1366
GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. Sow's will be killed and Cubs left to starve or be killed by predators.	Population parameters	Do NOT delist the Yellowstone Grizzlies! - THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - DECLINING FOOD SOURCES: Historically bears dependent on 4 food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. These states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. - GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. Sow's will be killed and Cubs left to starve or be killed by predators. Don't delist the Grizzlies. Too many of them are being killed even with protection. There is no reason to delist them. Do you really want the states to lose millions of tourist dollars? That's what will happen because millions of people come to the Tetons and Yellowstone to see the Grizzlies. If they are hunted they won't be seen in the parks like they are now. To delist them is totally wrong on so many levels.	FWS-R6-ES-2016-0042-1366
The grizzlies should be allowed to "naturally expand." This especially includes expansion of their range into the Big Horn Mountains.	Population parameters	The grizzly is the slowest reproducing mammal in North America. To our knowledge there is no population number that has ever been proclaimed "safe" by any reputable study. The businesses and residents in grizzly territory have learned to peacefully co-exist. Bear-on-human incidents are extremely rare within fifty miles of Yellowstone Park. There is simply no reason to delist other than cattle operations which have been leasing government land for cents on the fair market value dollar do not want to give up their "cushy deal". There are national lands. While we have many friends in Wyoming and Montana, there are times when local interests must yield to national interests. This is one of those times. The grizzlies should be allowed to "naturally expand." This especially includes expansion of their range into the Big Horn Mountains. I have elected to submit these comments anonymously. I am apprehensive about retaliation. A Native American website has suggested that Mr. Serveen is integrally involved with a renowned trophy hunting organization.	FWS-R6-ES-2016-0042-1432

Further, It makes no sense to delist Yellowstone grizzly bears under the Endangered Species Act inasmuch as wildlife biologists now recognize that biologically, grizzly populations have a very slow reproductive rate...statists show that fewer than 2,000 grizzlies exist in the continental states (down from 50,000 in the 19th century)	Population parameters	I am opposed to the plan of US Fish and Wildlife Service to delist Yellowstone bears from federal protection and further to allow trophy hunts on Yellowstone area grizzly bears. These magnificent animals are a keystone species in Yellowstone Park, and represent the kind of wild beauty that is quickly disappearing from the earth. Millions of Americans treasure the experience of seeing these amazing animals in their natural world, and millions of visitors from countries around the world also value these animals. Further, it makes no sense to delist Yellowstone grizzly bears under the Endangered Species Act inasmuch as wildlife biologists now recognize that biologically, grizzly populations have a very slow reproductive rate...statists show that fewer than 2,000 grizzlies exist in the continental states (down from 50,000 in the 19th century), also climate change, invasive species, and pesticide use make it harder for these animals to reproduce. It seems odd that the US Fish and Wildlife wants to reintroduce bears in the North Cascades of Washington State to ensure a genetically viable population, and at the same time, allow the remaining small population of grizzlies in Yellowstone Park to be hunted and killed by trophy hunters. This is not a logical decision. I urge the US Fish and Wildlife Service not to yield to pressure from special interest groups to desire to hunt, kill, and maim grizzly bears in Yellowstone Park for their own personal pleasure by issuing permits for trophy hunting. As you must be aware, the world was repulsed by the killing of the lion called Cecil in Africa last year. This incident created international negative response against trophy hunting and demonstrated that people who love wild populations of endangered animals will speak up and will not tolerate this kind of disrespect of endangered animals.	FWS-R6-ES-2016-0042-1467
Further, grizzly bears are one of the slowest reproducing mammals in North America. What would happen if a number of bears died due to unforeseen events in a single year? The population would be in jeopardy.	Population parameters	I oppose the delisting of Greater Yellowstone Ecosystem grizzly bears. Their population is at risk as it isolated from other grizzly bear populations. There are no plans for connecting the two populations, which is key to long term survival of the species. Further, grizzly bears are one of the slowest reproducing mammals in North America. What would happen if a number of bears died due to unforeseen events in a single year? The population would be in jeopardy. Finally, state management of the bears is a risk in and of itself. We have seen what happened when these predator-unfriendly states "managed" the wolves. The populations were decimated. Wyoming's so much so that a federal judge had to re-list Wyoming wolves. There are no assurances that things would be any different with management of grizzlies. Indeed, the discussion between the states so far has indicated that they plan a trophy hunting season and that bears dispersing to connect with other populations would be among those first to be killed. As if that weren't enough, a majority of Americans oppose the delisting of Yellowstone area grizzly bears. These bears are icons of the American wilderness as well as a huge tourism draw to the region. They should be protected, not delisted.	FWS-R6-ES-2016-0042-1455
GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population	Population parameters	My position on the proposed rule concerning the Removal of Grizzly Bears from the Greater Yellowstone Ecosystem from the Endangered and Threatened Wildlife list is as follows: - The proposed rule does nothing to address the lack of an adequate grizzly gene pool in the Yellowstone area. The existing grizzly population is to small and lacks access to other populations north of this ecosystem. There currently are no plans between Montana, Idaho or Wyoming to provide the means for grizzlies to reach other bear populations which would give them the opportunity to improve the biological diversity. - DECLINING FOOD SOURCES: It has been documented by Wildlife Management teams that grizzlies main food sources have been wiped out due to climate change (whitebark pine), invasive species (cutthroat trout) and use of pesticides in/and near the Yellowstone Ecosystem (moths). While some waterways are being restocked with cutthroat trout, this is only a part of the necessary diet for grizzly bears. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. Montana, Wyoming and Idaho have shown themselves to be incredibly hostile toward predators. Bears trying to disperse have become victims of trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. Such is likely to be the norm after delisting. Any bear that has it's den outside the Grand Teton Park, Yellowstone Park, or on national forest lands, there is a good chance that these bears will be killed by hunters. This happened in November 2015 in Montana at the northern edge of the Yellowstone Ecosystem when a hunter, claiming self defense without proof of any aggression shown by the bear, shot and killed with one bullet, Grizzly #211, also known as Scarface, an aged grizzly (26 plus years) who happened to be in poor health. To add insult to the poaching of #211, the State of Montana withheld media release of this incident until after the comment period for the Delisting Grizzlies proposal was passed. This is exactly the kind of thing that removing Grizzlies from the Endangered list will become the norm for Montana, Wyoming and Idaho, under the guise of protecting the bears. The only protections these states want is to line their state coffers by the trophy hunters. - MOST AMERICANS OPPOSE DELISTING. Fifty-five percent of Americans are opposed to ending federal protections for the region's grizzly bears, and by a 3-to-1 margin people oppose grizzly hunting, a new poll conducted by Remington Research Group commissioned by the Humane Society of the United States and Wyoming Wildlife Advocates. - BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. As stated above, grizzlies are already being slaughtered by hunters. The claim of self-defense has yet to be verified, even after 5 months of investigation. If the Grizzly bear is delisted, further conflict with humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population.	FWS-R6-ES-2016-0042-1550
So why not let the numbers grow to a few thousand 3-4 then put a no hunting zone around every park that has GB in it of at least 30-50 miles. THERE IS NO REASON TO BE HUNTING GRIZZLY BEARS IN THE LOWER 48 AT THIS TIME!!!!!!!!!! AND FOR SURE NOT IN ARE CLOSE TO A PARK!!!!!!!!!!!!!!	Population parameters	I've been a hunter and guide for over 35 years. my whole family hunts and passed have hunted our whole life's. But i don't see any reason to be hunting grizzly bears with such a low number in the lower 48. We spend 4-6 weeks in and around yellowstone every year for the past 10 years and i can tell you there is not a GB around every corner. There are trips that we never see a GB and we spend a lot of time looking. With the number being so low and being they reproduce at such a slow rate if there was as disease to hit them the number could fall to super low!!!!!! So why not let the numbers grow to a few thousand 3-4 then put a no hunting zone around every park that has GB in it of at least 30-50 miles. THERE IS NO REASON TO BE HUNTING GRIZZLY BEARS IN THE LOWER 48 AT THIS TIME!!!!!!!!!! AND FOR SURE NOT IN ARE CLOSE TO A PARK!!!!!!!!!!!!!!	FWS-R6-ES-2016-0042-1563
Forty years of work and millions of dollars were invested to save Grizzly Bears from extinction. Despite these efforts, the Grizzly bear population is still dangerously low. Removing the protections afforded by the Endangered Species Act will bring the demise of the Grizzlies. Please do not bend to the desires of hunters, the dictates of ranchers or the demands of developers at the expense of Yellowstone's Grizzly bears.	Population parameters	The recent announcement of the illegal killing (in November 2015) of beloved Yellowstone Patriarch, Scarface, sent shock waves through the millions of visitors to Yellowstone who knew and loved him. He was a legend-Yellowstone's dignified Ambassador. A 25+ year veteran of Yellowstone he was followed by professional photographers and nature lovers alike. Visitors came to the Park each year to catch a glimpse of this famous bear. Scarface was a model bear who was habituated to humans as are many of Yellowstone's "roadside bears". He was good natured and non aggressive which makes his death all the more tragic. He should have never been killed. One person's irresponsible act, robbed Scarface of his final years and denied me and millions of others who loved him of the privilege and opportunity to observe him in the wild. What happened to Scarface is a cautionary tale of the fate that awaits all of Yellowstone's Grizzly bears. If delisted each bear will have a bounty on its head. These magnificent icons of our heritage will be decimated by Trophy Hunters who have already readied their high powered rifles to take out the most famous roadside bear of them all-Bear 399. We must not allow this tragedy to repeat itself. Forty years of work and millions of dollars were invested to save Grizzly Bears from extinction. Despite these efforts, the Grizzly bear population is still dangerously low. Removing the protections afforded by the Endangered Species Act will bring the demise of the Grizzlies. Please do not bend to the desires of hunters, the dictates of ranchers or the demands of developers at the expense of Yellowstone's Grizzly bears. We owe it to future generations to ensure that Grizzlies will forever roam wild and free in Yellowstone. Please do not delist Yellowstone's Grizzly bears.	FWS-R6-ES-2016-0042-1554
The complete lack of genetic flow into the GYE will only result in the loss of allelic diversity in the future. Allele diversity is the key to adaptation, adaptation that will be required in the face of a changing climate, and therefore changing diet regime. Lack of genetic diversity is also the road to which we arrive at genetic bottle necks which will invariably result in lower reproductive rates, lower survival rates, and ultimately driving down population numbers. We ought to strive for genetic connectivity with other populations of grizzly bears so as to not negate the past several decades worth of conservation efforts.	Population Parameters	As a resident of the Greater Yellowstone Ecosystem and naturalist instructor for Yellowstone National Park, I am concerned about the potential of removing the grizzly bear from the Threatened List under the ESA. My concerns are three fold: 1. The complete lack of genetic flow into the GYE will only result in the loss of allelic diversity in the future. Allele diversity is the key to adaptation, adaptation that will be required in the face of a changing climate, and therefore changing diet regime. Lack of genetic diversity is also the road to which we arrive at genetic bottle necks which will invariably result in lower reproductive rates, lower survival rates, and ultimately driving down population numbers. We ought to strive for genetic connectivity with other populations of grizzly bears so as to not negate the past several decades worth of conservation efforts. 2. Delisting would also send a message to the public that pathetically low population numbers and range occupation is 'good enough' for the grizzly bear and potentially other organisms. What I mean exactly is that the ESA gives us legal scaffolding to compare current habitat occupation and population numbers with historic levels in order to determine candidacy for protection. While great work has been done for grizzlies, they still only reflect a fraction of historic levels. I am not endorsing we have grizzlies occupy 100% of historic range, but there is space and tolerance for grizzlies that is not filled. Let us make sure if we are delisting these animals we have set them up for success, not damned them to a zoo-like fate restricted only to our parks and surrounding areas. 3. The final concern I have is that a delisted bear will be managed by the state, which will almost certainly involve trophy hunting. Trophy hunting, by definition, is not intended to supply an individual with meat nor is it intended to benefit the animal in anyway; it is only meant to stroke the ego of the hunter (the state claims economic benefits of this practice)-further reinforcing the mentality of dominance over nature that has driven too many management decisions in the past. Let wildlife watching and seeking the 'wilderness' experience drive the economic benefits derived from grizzly, not their further demise. Trophy hunting an animal like the grizzly bear will also create bad repertoire with the animal, instead of respect and reverence. These are the three factors driving my opinion that we are not ready to delist the Yellowstone grizzly bear population.	FWS-R6-ES-2016-0042-1576
This is incredible. The grizzly bear population in the Greater Yellowstone Ecosystem (GYE) has not only doubled, but instead it has tripled. Compared to July 28, 1975, when the GYE grizzly bears were put on the List of Endangered and Threatened Wildlife. By all means I think that they should defiantly be taken off of the endangered list.	Population parameters	See attached file(s) Attachments (GYE) Grizzly	FWS-R6-ES-2016-0042-1581

2. Delisting would also send a message to the public that pathetically low population numbers and range occupation is 'good enough' for the grizzly bear and potentially other organisms. What I mean exactly is that the ESA gives us legal scaffolding to compare current habitat occupation and population numbers with historic levels in order to determine candidacy for protection. While great work has been done for grizzlies, they still only reflect a fraction of historic levels. I am not endorsing we have grizzlies occupy 100% of historic range, but there is space and tolerance for grizzlies that is not filled.	Population Parameters	As a resident of the Greater Yellowstone Ecosystem and naturalist instructor for Yellowstone National Park, I am concerned about the potential of removing the grizzly bear from the Threatened List under the ESA. My concerns are three fold: 1. The complete lack of genetic flow into the GYE will only result in the loss of allelic diversity in the future. Allele diversity is the key to adaptation, adaptation that will be required in the face of a changing climate, and therefore changing diet regime. Lack of genetic diversity is also the road to which we arrive at genetic bottle necks which will invariably result in lower reproductive rates, lower survival rates, and ultimately driving down population numbers. We ought to strive for genetic connectivity with other populations of grizzly bears so as to not negate the past several decades worth of conservation efforts. 2. Delisting would also send a message to the public that pathetically low population numbers and range occupation is 'good enough' for the grizzly bear and potentially other organisms. What I mean exactly is that the ESA gives us legal scaffolding to compare current habitat occupation and population numbers with historic levels in order to determine candidacy for protection. While great work has been done for grizzlies, they still only reflect a fraction of historic levels. I am not endorsing we have grizzlies occupy 100% of historic range, but there is space and tolerance for grizzlies that is not filled. Let us make sure if we are delisting these animals we have set them up for success, not damned them to a zoo-like fate restricted only to our parks and surrounding areas. 3. The final concern I have is that a delisted bear will be managed by the state, which will almost certainly involve trophy hunting. Trophy hunting, by definition, is not intended to supply an individual with meat nor is it intended to benefit the animal in anyway; it is only meant to stroke the ego of the hunter (the state claims economic benefits of this practice)-further reinforcing the mentality of dominance over nature that has driven too many management decisions in the past. Let wildlife watching and seeking the 'wilderness' experience drive the economic benefits derived from grizzly, not their further demise. Trophy hunting an animal like the grizzly bear will also create bad repertoire with the animal, instead of respect and reverence. These are the three factors driving my opinion that we are not ready to delist the Yellowstone grizzly bear population.	FWS-R6-ES-2016-0042-1576
David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration."	Population parameters	FWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. But no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. But this is not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. But under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. FWS claims that the agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. But when David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS claims that Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. But this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS claims that the agency looks forward to hearing from the public about delisting. Yet a recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. FWS claims that the agency looks forward to consulting with Native American tribes about the delisting. But fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting.	FWS-R6-ES-2016-0042-1611
1. The Yellowstone area grizzly population may have increased and stabilized but it is a tiny remnant of the original grizzly population. This remnant should be highly protected to preserve the minute fraction of the original population. Before Europeans arrived, the American West supported a population of about 50,000 grizzly bears. Today, there are only 1,400-1,700 grizzlies left. At BEST, 3.4% of the grizzlies that existed in 1800 remain	Population Parameters	See attached file Attachments Comment on Grizzly Bear Delisting	FWS-R6-ES-2016-0042-1618
However, what must, and should, be emphasized is the fact that the grizzly bear population increases at a slower rate when the whitebark seed is scarce. It is well documented that good whitebark cone crops decrease grizzly mortality and increase the number of bear cubs per litter. For Grizzlies, one of the world's slowest-reproducing mammals, this issue cannot be ignored when considering delisting this iconic species.	Population parameters	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530

I know we can't nor do we probably want 50,000 bears roaming around the US, but a few thousand is nowhere near what it could or should be for them to prosper, especially in a place that is frequented by humans as often as Yellowstone is.	Population parameters	While they have used research and scientific information to base this decision, I think the Grizzly Bears should remain on the Endangered Species List. A couple thousand bears are a far cry from the over 50 thousand they once were. Another reason is because a main staple for the bears is the whitebark pine nut, but these trees are routinely being attacked by the pine beetle and will continue to be attacked more often because of changes in climate. The Grizzly Bears have already been removed from the List once but it was overturned because the US Fish and Wildlife Service had not taken the whitebark pine nut problems into account. I also don't completely believe the human-caused factors, such as over-hunting, has been or can every be completely resolved. In conclusion, it is my opinion that the Grizzly Bear be kept on the Endangered Species List and to remain there for as long as possible. I know we can't nor do we probably want 50,000 bears roaming around the US, but a few thousand is nowhere near what it could or should be for them to prosper, especially in a place that is frequented by humans as often as Yellowstone is.	FWS-R6-ES-2016-0042-1636
Grizzlyls are very slow in reproducing their young. IN fact I believe one of the longest for a mammal in the US. It takes a long time to rebound a sustainable population when it takes so long for them to rear their young and produce.	Population parameters	I am writing this in hopes that you will take my statements to heart. I am against delisting the grizzly bear in the greater Yellowstone ecosystem for many reasons. One of which is I traveled to Yellowstone this past August just to see grizzly bears and wolves. My friend and I spent thousands of dollars on this trip. Something I have saved a lifetime for and could finally do it. I am 54 years old and to see a grizzly in the wild as well as a wolf was a life long dream, and I saw both on my trip. I would spend it again, and I will as it changed my life. Delisting the bears will only do more harm and put them at so much risk, they need a buffer zone!!! Grizzlyls are very slow in reproducing their young. IN fact I believe one of the longest for a mammal in the US. It takes a long time to rebound a sustainable population when it takes so long for them to rear their young and produce. FI many females are shot and killed by the trophy hunters we loose the main source of this breeding. It could devastate the population! Grizzlyls as well as other animals in and around the park are loosing their habitat drastically. They have no choice but to leave the park to find food. And yes, this does cause conflict with ranchers. But you shoot those bears anyways, even under the protection of the ESA. Do we really need to kill more? From my understanding there are only about 700-800 grizzlies in the lower 48 states, that is nothing! And you want to kill more? WHY? to sell tags?? What about the people who spend thousands of dollars just to view one, not shoot one? 400 million people visited Yellowstone this year and most of them to see the wildlife! They spend tons and tons of money in the Wyoming state as well as Montana and surrounding states. Does it really make sense to sell a few tags to satisfy the 400 hundred trophy hunters you get or to continue to let the bears LIVE and have 400 million people paying and spending money in their states? Personally I am sick to death of this country catering to those who would rather trophy hunt an animal for no good reason but to satisfy as sadistic dream. These bears are part of your ecosystems, they are needed, they have a purpose, they matter!!! If you want to crunch numbers I am sure you will find that more people enjoy having the bears on our planet than Don't! the only reason a hunter wants them is to shoot them, to kill them to break up their family to have a RUG! Learning to co-exist with them may be a little harder and take a bit more energy that a quick gun shot would, but at least they get to live and be wild and free. It is time our government looked at the people who want the bears to be here! We should have a say in this matter too, and sometimes that is not the case, most times that is not the case. We cater to those who only know how to use a gun for their thrills. I however would rather shoot them with a camera for a lifetime memory and pay whatever it takes to be able to do so. Please, I beg you to keep these bears protected. There already are many poached, taken out by our own agencies because of depredation, and other non natural causes.....please stand up and fight for those of us who want to save the bears, it is time to do what is right by our wildlife and do what we have to do to ensure a future for these bears. Do not let it go to the states to manage as it is pretty clear how that will go. Most of these states are very hostile towards predators and do not take in the fact that it is all based on hate and not science. I want my grandchildren to see a majestic grizzly before the hunters shoot them all, before the states eradicate them from the planet to save the precious COWS. When does it stop? When does it end? It has to start here and not delist these bears. It is time now to take a stand against all the killing of all this wildlife, find ways to co-exist better with them in our lives. I am not against hunting, I own a hunting camp in Michigan. But what we shoot, we put on our table. We do not display it on our wall or floor. Trophy killing is horrible and senseless. That is all this delisting will be about...trophy killing. And while your at it, maybe think about banning trapping as that is pretty much about the most sickening form of hunting ever, that went out in the 1800's. Only those sadistic enough to watch an animal suffer do this kind of thing. Not a person I want living in my neighborhood, I can tell you that! It is time to end all this madness and really look at the big picture...our ecosystems are at risk. Our wildlife has been at great risk for too long now and it is time now to make it right. Please, please do not delist the grizzly (as well as the wolf). They mean too much to me, this planet, the US. Their lives matter!	FWS-R6-ES-2016-0042-1637
Finally, grizzlies have one of the slowest reproductive rates in North America. A dramatic population decline could happen quite quickly if a few mother bears are killed.	Population parameters	Please do not remove Endangered Species Act protections from the grizzly bears of the Greater Yellowstone Ecosystem. These bears are at great risk from climate change, human conflict and a slow reproductive rate. First, temperatures in Yellowstone already 1.4F higher they were last century. Because of those rising temperatures, we have seen a massive decline (up to 95%) in whitebark pine seeds. This is one of four important food sources for the bears and particularly impacts mother bears. If this is what 1.4 degrees has done, what will happen as temperatures continue to rise. We simply don't know and therefore should proceed carefully. Second, a record number of bears died last year even while protected. Many of these occurred due to some human conflict - hunters, livestock operations etc. Indeed, just this week, the wildlife loving community was shocked to learn that an elk hunter killed famous Bear 299 (Scarface) last November. Why this information was withheld for so long makes one wonder. The more important point, though, is that these bears are being killed in record numbers EVEN WITH PROTECTIONS IN PLACE. Why on earth, with this escalated decline, would we remove protections at this time. Finally, grizzlies have one of the slowest reproductive rates in North America. A dramatic population decline could happen quite quickly if a few mother bears are killed. I agree with the majority of scientific experts on the grizzly delisting. "An Ohio State University master's student, Harmony Szarek, found in her thesis that nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act." Most experts do not think these bears should be delisted. Most Americans (55% according to United States Humane Society) agree. Listen to the scientific experts. Listen to the people. Don't Delist Grizzly Bears!	FWS-R6-ES-2016-0042-1644

A recent Harvard study on stress and population has highlighted that the scientific community has greatly underestimated the needed population numbers and dispersal for large mammal survival, critically important in light of the speed with which climate change is assaulting habitat.	Population parameters	See Attached Attachments Trygstad Ellen	FWS-R6-ES-2016-0042-1607
I write this letter in concern to the revision of 50 CFR 17.11 which would remove the Greater Yellowstone Ecosystem (GYE) grizzly bear to a distant population segment (DPS) from the Federal List of Endangered and Threatened Wildlife. I think this is a great mistake. For example, it has been proven that grizzly bears are an umbrella species, meaning that because they require a large habitat, this protects other organisms living in the same habitat as the grizzly bears. I understand that long-term conservation monitoring will be taken place, however, this would only monitor the grizzly bear population and not the different organisms that live in the habitat of the grizzly bears. According to this proposal, the Interagency Grizzly Bear study Team (IGBST) will continue to monitor habitat standards and adherence to the 1998 baseline. Although, a continuation to monitor the abundance, and distribution of grizzly bear foods will still just focus on one species. Like I mention earlier, the grizzly bear being on the list of endangered species has allowed many organisms to continue to stay in their habitat.	Population Parameters	My name is Guadalupe Cordoba. I am currently a senior at St. Mary's University. I write this letter in concern to the revision of 50 CFR 17.11 which would remove the Greater Yellowstone Ecosystem (GYE) grizzly bear to a distant population segment (DPS) from the Federal List of Endangered and Threatened Wildlife. I think this is a great mistake. For example, it has been proven that grizzly bears are an umbrella species, meaning that because they require a large habitat, this protects other organisms living in the same habitat as the grizzly bears. I understand that long-term conservation monitoring will be taken place, however, this would only monitor the grizzly bear population and not the different organisms that live in the habitat of the grizzly bears. According to this proposal, the Interagency Grizzly Bear study Team (IGBST) will continue to monitor habitat standards and adherence to the 1998 baseline. Although, a continuation to monitor the abundance, and distribution of grizzly bear foods will still just focus on one species. Like I mention earlier, the grizzly bear being on the list of endangered species has allowed many organisms to continue to stay in their habitat. In the book "Spine of the Continent: The Race to Save America's Last, Best Wilderness" by Mary Ellen Hannibal emphasize the importance of having connectivity. Animals need corridors to do their natural migrations and potential connect different populations of grizzly bears. Grizzly Bears need a large habitat to gather food, sleep, and mate. If grizzly bears are limited their habitat, we might see habitat destruction because the connectivity of grizzly bears to their natural habitat could have a major effect on other organisms. For example, when grizzly bears dig for food they aerate the soil, and while eating salmon they make food available for scavengers and transfer rich nutrients from the river to forest. I think this proposal does not take into account the full connections that the grizzly bears have with other species and the ecosystem. When a land is divided into different small patches of land, fragmented, large animals like the grizzly bears would not be able to survive. In a study by William Newmark in 1987 he said that even though a species is protected, it will not survive if they are not able to move freely. Having boundaries just limits the connectivity of the animals and affects their population and others species who depend on the habitat of the larger species like the grizzly bears. The grizzly bears being part of the Endangered and Threatened list allows the grizzly bear to have the large habitat they need. Also, as humans, we need to think about the ethics regarding the ability we have to control and alter the habitat of so many species. Aldo Leopold in his book, "A Sand County Almanac" suggested that we should appreciate and protect wildlife because of its intrinsic value. That we should think of how great nature is because its nature. Also, we should think of the cultural diversity of the natural systems aside from what resources nature has to offer for people. He says that instead of trying to be the owners of nature we should be the stewards of nature. We should enjoy being part of nature, the home to all living organisms including humans. If we look at it this way, we should try to protect the grizzly bears because of their importance to the ecosystem.	FWS-R6-ES-2016-0042-1667

Decisions on Grizzly bear populations cannot be based on the present, because a changing habitat pictures is rapidly evolving and more, not less, bears are needed and bears not stressed by hunting.	Population parameters	See Attached Attachments Trygstad Ellen	FWS-R6-ES-2016-0042-1607
No one really knows how many grizzlies are in the GYE. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council stated: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source."	Population Parameters	No one really knows how many grizzlies are in the GYE. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council stated: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally.	FWS-R6-ES-2016-0042-1666
In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally.	Population parameters	No one really knows how many grizzlies are in the GYE. Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council stated: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally.	FWS-R6-ES-2016-0042-1666

Grizzlies are slow reproducing mammals and this could be devastating for the population when hunters claim innocence when they accidentally shoot sows and sows with cubs.	Population Parameters	DELISTING THE GRIZZLY NOW IS NOT RESPONSIBLE! Strike #1: Grizzlies depend on four food sources of which three are unreliable do to climate change. More studies need to be done. Strike #2: The proposed rule does not address the genetic isolation of the population in the GYE and there are no plans for more wildlife corridors making connectivity impossible. Strike #3: If grizzly management goes to the states, bears will be relentlessly hunted, reversing any population gains that have been made while on the ESL. Strike #4: Grizzlies are slow reproducing mammals and this could be devastating for the population when hunters claim innocence when they accidentally shoot sows and sows with cubs. And there are many more obstacles hindering healthy bear populations. They only occupy 1% of their historic range. Why can't we give them that? Do we have to destroy all wild grizzly populations? It is a small few who to see these iconic, majestic bears destroyed, hunted as trophies, but a much greater percentage of US citizens who are signing petitions, writing editorials, posting their displeasure about delisting on social media. PAY ATTENTION TO THE PEOPLE! THEY ARE ANGRY WITH THE DECISION TO DELIST. JUST READ THE COMMENTS! Do you not see the economics of wildlife watching? I visit the GYE at least five times a year to see wildlife and on the top of my list is the grizzly bear. If I was to stop visiting the communities (AND BRINGING MY CLIENTS, FAMILY AND FRIENDS) around Yellowstone NP/Grand Teton NP the economic loss would be thousands of dollars. And that is just me! I return over and over again, something a hunter's money does not do. Once an animal is killed, THAT IS THAT. I can watch the same bear in every season! You guys are just going to cave to the cattle industry, waning hunting clubs, gas and oil conglomerates and hateful, uneducated trophy hunters who just want to fight the system and kill everything for a head to hang on their wall and a rug to walk all over on their floor. Like they are king of the hill. They don't know how to share the miracle of nature, they have to dominate it. I am disgusted, disheartened, upset, angry and ready for the fight. WE NEED GRIZZLIES IN THE WILD. I was cheated when past generations of egotistical, uneducated men decimated wild buffalo herds. I did not get to experience seeing this spectacular phenomenon. I DON'T WANT TO CHEAT MY GRANDKIDS OF THE EXPERIENCE OF SEEING GRIZZLIES IN THE WILD. DO NOT DELIST! DO NOT DELIST! DO NOT DELIST! DO NATURE A FAVOR AND DO NOT DELIST. Thank you for taking to heart my comments. I COUNT ON YOU TO SAVE OUR NATIONS GRIZZLIES!	FWS-R6-ES-2016-0042-1710
Keep Grizzly Bears on the Endangered and Threatened Species List As well as the Grizzly Bear population has recuperated within the past few years, these numbers alone cannot guarantee aggregate protection of the species.	Population parameters	Keep Grizzly Bears on the Endangered and Threatened Species List As well as the Grizzly Bear population has recuperated within the past few years, these numbers alone cannot guarantee aggregate protection of the species. Although many factors were taken into consideration in the proposal, two main aspects of conservation biology were forgotten: 1) the ecosystem is a synchronized whole; protecting bears would protect other species as well, especially because bears are an umbrella species to their habitats and 2) all conservation methods, though pragmatic, have no definite outcome. Grizzly Bear conservation has been dynamic and many goals were reached including raising population numbers. However, just because the population has reached a certain set number does not mean they lack vulnerabilities. One such vulnerability is climate change. The issue of climate change is addressed in the proposal with the conclusion of having little impact on the bears. Grizzly Bears used to range from Northern Canada to Northern Mexico, a vast expanse of land known to many as the â€œSpine of the Continent.â€œ However, Grizzly bears are also creatures of the cold and with the rise in global temperature, their comfortable habitat range will continually be expurgated Northward. Climate change has also decline snowfall in certain areas; snowfall is important to Grizzlies as they inhabit dens where snow is unlikely to melt in warmer temperatures. As noted in the proposal, many Grizzly Bear biologists within this region do not believe climate change will affect the species. Though resilient and hardy creatures, by taking them off the Endangered and Threatened Species list, we are asking them to adapt to climate change as a whole species. As noted before, Grizzly Bears are known as a keystone and umbrella species of their systematic habitats. (Berger et al 2001) Just like the Grey Wolves in Yellowstone, even their presence affects many more species including both animal and plant life forms. Using the wolves as an example in Yellowstone, when the wolves were eliminated the whole ecosystem seemed to be dying alongside. Without wolves to control the Elk populations, the Elk overpopulated and ate or trampled many plant species. Without plant species, all the other mini-ecosystems such as the riverbanks were affected negatively as well. Though bear numbers are stable at the moment, they are faced with habitual vulnerabilities such as fragmentation and poaching. As the country develops, more and more land is urbanized and deforestation is rampant. Since the founding of our country, 90% of virgin forest has been cleared away due to human activities. (UMich) More and more roadways are built to convenience the lives of humans at the cost of roaming species. Habitat fragmentation is a somber issue often overlooked; fragmentation often leads to reduction of species richness, inbreeding, and loss of sustainability of the habitat for the animal itself. (Fahrig 2003) The concept of limited poaching is introduced especially if for self defense. However, bears are not harmful creatures and many methods can be implemented to prevent these creatures from attacking the population or the properties. The Habitat Based Recovery Criteria listed within the recovery planning are not backed with much scientific evidence; instead the bears are described as â€œopportunistic creaturesâ€œ (USF&W) As well as the bears are doing, they are not at the same level as historic numbers. Though I understand the change within the country over time due to large scale development such as the building of more roads, it must be understood the bears have too many factors affecting their recovery and a simple population number cannot be enough to gauge their elasticity. Removing Grizzly Bears from the Endangered and Threatened Species list only creates more vulnerability to the species. Berger, J. Stacey, PB. Bellis, L. and Johnson, MP. (2001), A MAMMALIAN PREDATOR&#x2013;PREY IMBALANCE: GRIZZLY BEAR AND WOLF EXTINCTION AFFECT AVIAN N EOTROPICAL MIGRANTS. Eco App (11): 947&#x2013;960. doi:10.1890/1051-0761(2001)011[0947:AMPPIG]2.0.CO;2 Available at: http://onlinelibrary.wiley.com/doi/10.1890/1051-0761(2001)0111580947:AMPPIG%5D2.0.CO;2/abstract Global Deforestation. Glob Change Uni Mich. [Internet] Available at: http://www.globalchange.umich.edu/globalchange2/current/lectures/deforest/deforest.html Fahrig, L. & Effects of Habitat Fragmentation on Biodiversity&#x2013;Annual Rev of Eco, Evol, and Syst. (2003) 34: 487&#x2013;515. [Internet] Available at: http://www.jstor.org/stable/30033784?seq=19#page_scan_tab_contents Proposal: https://www.regulations.gov/#searchResults;pp=25;po=0;s=bison;fp=true;ns=true	FWS-R6-ES-2016-0042-1670
Grizzly bears are already facing these hardships and coupled with being one of the slowest reproducing mammals we have in the United States it is a certainty that the killing of females would decimate the population within a very short period of time.	Population parameters	As a tax payer I would like to make my concerns known about any management plan to delist the Yellowstone Grizzlies. I am opposed for the following key reasons. 1. I have not seen any climate change impact study completed showing the impact on the current grizzly population. It has taken over 40 years to rebuild the grizzly population and they could be greatly impacted by climate change and their ability to survive if changes continue to negatively impact their food source such as it has with the Whitebark Pine. 2. Other food sources are declining as well due to other environmental reasons such as the Cutthroat Trout being lost due to invasive species taking over and moths are increasingly unreliable due to man's use of pesticides. These three primary food sources for grizzlies in decline mean that the current grizzly population will already be under stress to continue to survive without hunters being allowed to kill them as well. 3. Grizzly bears are already facing these hardships and coupled with being one of the slowest reproducing mammals we have in the United States it is a certainty that the killing of females would decimate the population within a very short period of time. Grizzlies have already lost 99% of their range. Yellowstone is one of the last of their territories in the continental United States and we must be cognizant of that fact if hunting is allowed and they cannot sustain reproduction. 4. While the vast majority Americans, 90% by a national poll, support the Endangered Species act hunters have historically had the "ear" of state management and have been allowed to hunt species to near extinction, we must reverse this hostile management style in Yellowstone as many more people visiting this beautiful National Park want to see LIVE bears. Case in point bear 399 a female that thousands upon thousands of visitors from the US and around the world come back to see year after year with her cubs. The hunting clubs already have a target on her back and this does not bode well for Yellowstone tourism as well as the grizzly bear population as a whole. As well as wanting to preserve the endangered species act most Americans also oppose delisting the Yellowstone grizzlies. Only 26% of Americans actually want to delist the grizzly. The vast majority again want and expect the USFWS to do their job and continue to protect the wildlife under their care. 5. A record number of Yellowstone area grizzly bears were already killed in 2015 despite Endangered Species Act protections. The grizzly population is already being removed for increased conflicts with ranchers and illegal hunting as they roam further out to look for food sources to compensate for their primary food sources being affected by climate change and other environmental impacts. As a result of these increased numbers of grizzly bear killings it is far too early to delist them without further study and discussion of other management plans.	FWS-R6-ES-2016-0042-1750

The fact is that one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services numbers. But what we do know is that at least 60 grizzlies died last year, mostly at the hand of man, and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest, if not the lowest reproductive rate of any mammal in the GYE. The continuation of such mortality rates will likely very soon result in a critically low GYE grizzly population.	Population parameters	I am apposed to delisting grizzly bears in the Greater Yellowstone Ecosystem (GYE) for the following reasons: 1. The fact is that one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services numbers. But what we do know is that at least 60 grizzlies died last year, mostly at the hand of man, and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest, if not the lowest reproductive rate of any mammal in the GYE. The continuation of such mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work needs to be done in the GYE to prevent many of these grizzly deaths before this population can be safely delisted. Such actions as mandating that ranchers remove their garbage and carcass dumps to county facilities, the use of bear-proof garbage cans in communities, camping areas, etc. within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for hunters and other public land users in grizzly habitat need to be implemented within the GYE before grizzlies are delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations, endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate bears from other populations into the GYE to improve genetic diversity but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat in the GYE and prevent them from colonizing other lands in which they were originally found. This will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of this land is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead should be "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout and possibly even army cutworm moths populations have recently been significantly reduced due to a variety of human caused issues. More research is needed to determine how the loss of these food sources will impact the future grizzly population in the GYE. 4. GYE Grizzlies should be managed as an ecosystem population rather than separately by three different states, all of which have stated their desire to significantly reduce the population and limit their occupied habitat. 5. Recent studies have shown that GYE Grizzly Bears are a currently important, and significantly rising economic resource to GYE communities. Yellowstone National Park visitors have listed grizzlies and wolves as the two most important species they want to be able to observe due to their scarcity. Many national park visitors come specifically to see these apex predators. Live bears are much more valuable to the GYE economy than dead bears. Live grizzlies are likely the most economically valuable animal in the GYE. 6. Hunting organizations and state wildlife management agencies have advanced the myth that grizzlies need to be hunted for them to fear man and that hunting will therefore reduce conflicts and increase the safety of people. Recent studies by respected grizzly researcher David Mattson and others have debunked this myth showing the exact opposite to be true. Bears used to being around people who exhibit them no harm show an overall decreased aggressive response to humans. A dead bear obviously cannot learn anything. Thank you for this opportunity to express my views on this important issue. My hope is that the U.S. Fish & Wildlife Service will not cave into the political pressure being exhibited by a few powerful groups that want to eliminate or greatly reduce the GYE grizzly population and instead listen to the majority of the public who now realizes that grizzlies play an important role in the ecology of the GYE and allow for their continued existence under the protection of the Endangered Species Act.	FWS-R6-ES-2016-0042-1765
If they aren't delisted your agency will have to kill them off in greater numbers than regulated hunting will, due to problems with too many Bear for the region to hold.	Population parameters	Please stick with the scientifically sustainable plan and delisting criteria reached in 2004. The recovery goal was met and we can't manage the Wildlife with emotion and tears, it won't work. Once again the 3 states involved have jumped through ALL the hoops and the frivolous lawsuits keep coming. Reset the goal post is the way of the environmentalist, who don't understand basic Wildlife conservation/management. We are loaded with Grizzlies and they weren't meant to stay on the endangered species list for an eternity. Same thing with wolves....both need delisted so they don't continue to overpopulate and destroy the rest of the Wildlife. As usual we reached the goals and it will never be enough for the emotionally charged that would rather see them die of disease or starvation before they approve of hunting any animal. Anti hunting rhetoric only hurts the species, whether they think so or not. Can't manage Wildlife with hugs. If they aren't delisted your agency will have to kill them off in greater numbers than regulated hunting will, due to problems with too many Bear for the region to hold. Stay with your agreements, for once, and delist.	FWS-R6-ES-2016-0042-1771
Grizzly bear mortality appears to be increasing, even though bear population is stagnant or diminishing over the past several years. It is hard for the lay person to tease out exact mortality statistics, but I find it significant that 2008 mortality when the bear was first delisted was 58, a record at that time, and that 2015 mortality is now 61. Intervening years are around 50. For an animal of slow reproductive rate and marginal population this is a pessimistic trend. If delisting is accomplished as in 2008, we can expect greater mortality from hunter-related incidents as bears are drawn to elk carcasses or disturbed, and hunters can and will, shoot bears with far fewer, or no state enforced penalties.	Population Parameters	See attached file(s) Attachments Grizzly Bear Delisting Proposal Attn	FWS-R6-ES-2016-0042-1757
In 2015--59 grizzlies killed- this number tops all other years - the population is down 14% from 2014. These are troubling numbers.	Population parameters	See Attached Attachments Bullinger Broke	FWS-R6-ES-2016-0042-1787

As well as the bears are doing, they are not at the same level as historic numbers. Though I understand the change within the country over time due to large scale development such as the building of more roads, it must be understood the bears have too many factors affecting their recovery and a simple population number cannot be enough to gauge their elasticity.	Population parameters	Keep Grizzly Bears on the Endangered and Threatened Species List As well as the Grizzly Bear population has recuperated within the past few years, these numbers alone cannot guarantee aggregate protection of the species. Although many factors were taken into consideration in the proposal, two main aspects of conservation biology were forgotten: 1) the ecosystem is a synchronized whole; protecting bears would protect other species as well, especially because bears are an umbrella species to their habitats and 2) all conservation methods, though pragmatic, have no definite outcome. Grizzly Bear conservation has been dynamic and many goals were reached including raising population numbers. However, just because the population has reached a certain set number does not mean they lack vulnerabilities. One such vulnerability is climate change. The issue of climate change is addressed in the proposal with the conclusion of having little impact on the bears. Grizzly Bears used to range from Northern Canada to Northern Mexico, a vast expanse of land known to many as the â€œSpine of the Continent.â€œ However, Grizzly bears are also creatures of the cold and with the rise in global temperature, their comfortable habitat range will continually be expurgated Northward. Climate change has also decline snowfall in certain areas; snowfall is important to Grizzlies as they inhabit dens where snow is unlikely to melt in warmer temperatures. As noted in the proposal, many Grizzly Bear biologists within this region do not believe climate change will affect the species. Though resilient and hardy creatures, by taking them off the Endangered and Threatened Species list, we are asking them to adapt to climate change as a whole species. As noted before, Grizzly Bears are known as a keystone and umbrella species of their systematic habitats. (Berger et al 2001) Just like the Grey Wolves in Yellowstone, even their presence affects many more species including both animal and plant life forms. Using the wolves as an example in Yellowstone, when the wolves were eliminated the whole ecosystem seemed to be dying alongside. Without wolves to control the Elk populations, the Elk overpopulated and ate or trampled many plant species. Without plant species, all the other mini-ecosystems such as the riverbanks were affected negatively as well. Though bear numbers are stable at the moment, they are faced with habitual vulnerabilities such as fragmentation and poaching. As the country develops, more and more land is urbanized and deforestation is rampant. Since the founding of our country, 90% of virgin forest has been cleared away due to human activities. (UMich) More and more roadways are built to convenience the lives of humans at the cost of roaming species. Habitat fragmentation is a somber issue often overlooked; fragmentation often leads to reduction of species richness, inbreeding, and loss of sustainability of the habitat for the animal itself. (Fahrig 2003) The concept of limited poaching is introduced especially if for self defense. However, bears are not harmful creatures and many methods can be implemented to prevent these creatures from attacking the population or the properties. The Habitat Based Recovery Criteria listed within the recovery planning are not backed with much scientific evidence; instead the bears are described as â€œopportunistic creaturesâ€œ (USF&W) As well as the bears are doing, they are not at the same level as historic numbers. Though I understand the change within the country over time due to large scale development such as the building of more roads, it must be understood the bears have too many factors affecting their recovery and a simple population number cannot be enough to gauge their elasticity. Removing Grizzly Bears from the Endangered and Threatened Species list only creates more vulnerability to the species. Berger, J. Stacey, PB. Bellis, L. and Johnson, MP. (2001). A MAMMALIAN PREDATORâ€™S PREY IMBALANCE: GRIZZLY BEAR AND WOLF EXTINCTION AFFECT AVIAN N EOTROPICAL MIGRANTS. Eco App (11): 947â€™960. doi:10.1890/1051-0761(2001)011[0947:AMPPIG]2.0.CO;2 Available at: http://onlinelibrary.wiley.com/doi/10.1890/1051-0761(2001)011%5B0947:AMPPIG%5D2.0.CO;2/abstract Global Deforestation. Glob Change Uni Mich. [Internet] Available at: http://www.globalchange.umich.edu/globalchange2/current/lectures/deforest/deforest.html Fahrig, L. â€œEffects of Habitat Fragmentation on Biodiversityâ€œ Annual Rev of Eco, Evol, and Syst. (2003) 34: 487â€™515. [Internet] Available at: http://www.jstor.org/stable/30033784?seq=19#page_scan_tab_contents Proposal: https://www.regulations.gov/#/searchResults;pp=25;po=0;s=bison;fp=true;ns=true	FWS-R6-ES-2016-0042-1670
We can't take a chance on the population crashing--all it would take is one or two years of higher than normal mortalities. We should error on the side of caution and refuse to delist.	Population parameters	See Attached Attachments Bullinger Broke	FWS-R6-ES-2016-0042-1787
Grizzly numbers are still at a level of uncertainty and are susceptible to many variables from year to year. The fact that nearly 60 bears were killed alone in 2015 while still protected exemplifies this instability. (known deaths)	Population parameters	To Fish and Wildlife Services and others concerned with this issue, I am writing to oppose Grizzly delisting and hope that the bigger picture of scientific evidence will be considered. This consideration is premature on many scientific levels. We have not fully gained the knowledge and evidence that the declining amount of white bark pine, cutthroat trout and other food sources for grizzly bears will not affect their long-term survival and numbers. Additionally, it can not be underestimated that the effects of climate change will continue to poorly affect the numbers and longevity of grizzly bears in the lower 48. Grizzly numbers are still at a level of uncertainty and are susceptible to many variables from year to year. The fact that nearly 60 bears were killed alone in 2015 while still protected exemplifies this instability. (known deaths) I am greatly disturbed by the recent decision of the FWS to very belatedly notify the public of the killing of a grizzly bear that occurred in November 2015. This is atrocious. The public deserves answers, facts and timely information rather than politics. Decisions like this do not provide for public trust and faith in the various agencies or states to protect grizzlies if delisted. Additionally, it is worrisome and inappropriate that the loss of habitat for grizzlies due to human encroachment is not being considered part of the factor in maintaining quality numbers of grizzlies over the long term. Human-bear conflict most often results in the dispatching of the bear...to delist the grizzly ignores the fact that grizzly bears need large amounts of habitat to exist and thrive. Their protection under the ESA allows for better management and public restraint and education when human-bear ranges overlap. These are just a few of the reasons against de-listing. Scientifically, ethically, and environmentally it is premature and unsound to delist the grizzly bear.	FWS-R6-ES-2016-0042-1827
population genetics and evolutionary biology and natural selection were not adequately considered.	Population parameters	See Attached Attachments Gutkoski Joe	FWS-R6-ES-2016-0042-1797
Throughout the FWS's report and specifically on page 111 it is stated that the GYE grizzly population has stabilized in growth since 2002, signaling a reach of carrying capacity. In this scenario density-dependent factors influence population growth the most. This indicates the population is recovered and at sustainable levels, a testament to the success of the ESA. The ultimate test for success is removal of a species from the ESA, and it seems that the GYE DPS is ready for this action.	Population parameters	As an avid user of the Greater Yellowstone area and professional land manager of the Forest Service, I fully support delisting the Grizzly Bears of the Greater Yellowstone Ecosystem's distinct population segment. Nothing is so unique as traveling in remote, primeval backcountry inhabited by grizzly bears, and I do not feel that delisting will threaten this experience. Throughout the FWS's report and specifically on page 111 it is stated that the GYE grizzly population has stabilized in growth since 2002, signaling a reach of carrying capacity. In this scenario density-dependent factors influence population growth the most. This indicates the population is recovered and at sustainable levels, a testament to the success of the ESA. The ultimate test for success is removal of a species from the ESA, and it seems that the GYE DPS is ready for this action. I have traveled much in the Thorofare region of the GYE and have had many encounters with grizzlies. I revel in these experiences, and while frightening, it makes one realize his own insignificance in the face of raw wilderness. One is forced to be better prepared, more aware, and more observant. It is a true wilderness experience that is only found in a few special places. However, it also has seemed to me that these encounters are unnaturally high, and the bears have seemed desperate. I have found carcasses where one bear has killed another, and been in situations where many bears flocked to one elk carcass. It seems that the bears are a detriment to each other, and its time for them to be professionally regulated to some degree. The debate of delisting seems to center on the proposal of Wyoming, Montana, and Idaho to implement carefully regulated hunting seasons of grizzly bears. Many critics warn of dramatic declines of numbers caused by "anti-carnivore" state agencies allowing trophy hunting. However, upon reading of the report and Conservation Strategy one will see hunting will be highly regulated based upon population wide numbers and mortality. Females with young will not be hunted, and very specific percentages of population will be available for discretionary mortality. In short, the guidelines for regulated hunting are specific under the report, starting on page 111. Moreover, it is likely that removing some males from the population will result in less inter-killings and therefore higher rates of sub-adult survival. In reality state based management has resulted in robust populations of all game species throughout the country. Revenue generated will help with continued study and management of the grizzlies. There are no indications that hunting will cause grizzly populations to dramatically decline to pre-ESA numbers as some critics claim. Rather it seems to be more of a social argument of some people not supporting hunting at all, and the grizzly has become the focus of this disapproval. In short I believe in trusting the experts we as a country have appointed to study and recover grizzly populations. Through years of hard work, study, debate, and implementation this collaborative team has recovered GYE grizzlies to a sustainable population. This is a testament to the success of the collaborative process and the ability of the ESA to result in recovered species. I fully support the FWS's recommendation to delist the grizzly bear of the GYE DPS.	FWS-R6-ES-2016-0042-1802
Although the population has grown since 1975, "...the bears have gradually expanded their occupied habitat by more than 50%." (https://www.nps.gov/yell/learn/nature/gbearinfo.htm), I researched and found that they are not yet prolific and critical mass is pending.	Population parameters	Please consider the alternative when you stop protecting Grizzlies in Greater Yellowstone Ecosystem. Grizzlies remain at risk. They are still an endangered species and require our outspoken protestations against removal from the current Endangered/Threatened list. When they have significantly repopulated the area, you may revisit this unwarranted legislation. Although the population has grown since 1975, "...the bears have gradually expanded their occupied habitat by more than 50%." (https://www.nps.gov/yell/learn/nature/gbearinfo.htm), I researched and found that they are not yet prolific and critical mass is pending. I lobby to keep Grizzly Bears on the Federal List of Endangered and Threatened Wildlife in the Greater Yellowstone Ecosystem until further investigation circa 2020.	FWS-R6-ES-2016-0042-1856
Seven Hundred.....not a large number by any means. Couple that with the facts that they are very slow to reproduce, have at best a 50% chance of making it to breeding age and their primary food sources are being devastated by climate change make this rebound in numbers tenuous at best.	Population parameters	I am writing today to express my concern over the proposed plan to delist the Grizzly Bear from the Endangered Species Act. Many have stated on social media and in articles concerning the subject that appealing to your office and the state governments of Idaho, Montana and Wyoming is a waste of time. As far as I am concerned, you are still part of the US Government and, as such, for the people. Therefore, I am confident that you will treat the concerns of all constituents with thoughtful consideration in this and all matters related to your work. Please vote to keep the Grizzly Bear under the protection of the Endangered Species Act. Yes, grizzly numbers in the Greater Yellowstone Ecosystem have grown from a low near 150 before listing, to over 700. Seven Hundred.....not a large number by any means. Couple that with the facts that they are very slow to reproduce, have at best a 50% chance of making it to breeding age and their primary food sources are being devastated by climate change make this rebound in numbers tenuous at best. At this time, there is no economic or safety value to delisting. "Problem" bears are still handled on a case by case basis and economically, their value as a draw to the National Parks (Yellowstone and Teton) where they reside is estimated to be greater than \$10,000,000 per year. Any income gained by delisting and issuing hunting permits would be short lived and modest to nonexistent in comparison. The argument that trophy hunting will be economically important to saving the grizzly is arcane and outdated. One should also factor in the sentiments not only of our nation, but that of people from around the globe, many whom travel to the US annually for the chance of glimpsing one of these iconic bears. How can we ask other nations to conserve and protect their wildlife when we stop protecting ours? And, yes, they are a keystone species. Their recovery, along with that of the two other major predators in Greater Yellowstone, the wolf and the mountain lion, have been shown to have improved the health of the entire ecosystem. I hope that you will consider this argument and that, in the final vote, our federal government will stand behind continuing to protect this iconic species.	FWS-R6-ES-2016-0042-1864

The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time.	Population parameters	The proposal to delist Yellowstone Grizzly Bears is irresponsible and will result in the decimation of our Country's iconic symbol of the West. For the following reasons below the proposal to delist must be abandoned: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. 2. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien lake trout. 3. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. The population will decline after delisting, and cannot be sustained without life-support measures. 4. The delisting plan fails to address issues associated with high, ongoing human caused grizzly bear mortality. Most of the grizzly bears that die in the Greater Yellowstone Ecosystem die of human causes, and most are avoidable. While Yellowstone Park and some communities outside the park have gone to enormous measures to remove grizzly bear attractants, others have not. The problem of mortality of food-habituated bears will only get worse after delisting, when allowable mortality levels are raised, and resources for conflict resolution are reduced. Because problem grizzly bears are a human safety problem, it only makes sense to resolve the ongoing sanitation issues in the ecosystem before delisting. 5. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public. 6. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources. Please keep the Yellowstone Grizzlies protected! Do not delist them!	FWS-R6-ES-2016-0042-1912
Yes, the bear's numbers have increased, but it took 40 years. The animal has a slow rate of population increase due to a higher mortality rate prior to reaching reproductive age which takes longer than most large carnivores. The bears population can be drastically affected if numbers were reduced due to hunting as the FWS of the various states have demonstrated a lack of responsiveness to turns in populations, or an utter lack of concern for sustaining large carnivores.	Population Parameters	I oppose the delisting of the Greater Yellowstone Grizzlies. This move has been initiated by a small group of individuals that have a financial stake in delisting. The larger body of the American citizenry that have a limited ability to see these great bears and equate to millions of dollars in revenue for the area are being ignored. Yes, the bear's numbers have increased, but it took 40 years. The animal has a slow rate of population increase due to a higher mortality rate prior to reaching reproductive age which takes longer than most large carnivores. The bears population can be drastically affected if numbers were reduced due to hunting as the FWS of the various states have demonstrated a lack of responsiveness to turns in populations, or an utter lack of concern for sustaining large carnivores. This animal should be preserved for its vital role in the health of the biomes in which it is present, and for the economics of recreation that vastly outpace the growth in the extractive industries that wish to hunt, or remove the bear. The Greater Yellowstone Ecosystem expands well beyond the park, but its animals are hunted and killed in accidents when they leave it. The only protection that the bears have is their federal status. To remove it would significantly limit the bear's ability to interact with other populations in Glacier, or Canada weakening the genetic diversity of the bear. Greater efforts to support living with the bears should be the next step of its conservation efforts not delisting.	FWS-R6-ES-2016-0042-1884
The USFWS claims there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration."	Population parameters	I OPPOSE DELISTING!! Here is why and the science behind it: THE USFWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. The USFWS claims there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." More science to come.	FWS-R6-ES-2016-0042-1878
The delisting plan fails to address issues associated with high, ongoing human caused grizzly bear mortality. Most of the grizzly bears that die in the Greater Yellowstone Ecosystem die of human causes, and most are avoidable. While Yellowstone Park and some communities outside the park have gone to enormous measures to remove grizzly bear attractants, others have not. The problem of mortality of food-habituated bears will only get worse after delisting, when allowable mortality levels are raised, and resources for conflict resolution are reduced. Because problem grizzly bears are a human safety problem, it only makes sense to resolve the ongoing sanitation issues in the ecosystem before delisting.	Population Parameters	The proposal to delist Yellowstone Grizzly Bears is irresponsible and will result in the decimation of our Country's iconic symbol of the West. For the following reasons below the proposal to delist must be abandoned: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. 2. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien lake trout. 3. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. The population will decline after delisting, and cannot be sustained without life-support measures. 4. The delisting plan fails to address issues associated with high, ongoing human caused grizzly bear mortality. Most of the grizzly bears that die in the Greater Yellowstone Ecosystem die of human causes, and most are avoidable. While Yellowstone Park and some communities outside the park have gone to enormous measures to remove grizzly bear attractants, others have not. The problem of mortality of food-habituated bears will only get worse after delisting, when allowable mortality levels are raised, and resources for conflict resolution are reduced. Because problem grizzly bears are a human safety problem, it only makes sense to resolve the ongoing sanitation issues in the ecosystem before delisting. 5. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public. 6. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources. Please keep the Yellowstone Grizzlies protected! Do not delist them!	FWS-R6-ES-2016-0042-1912
Reduced high value food supplies due to the loss of Yellowstone Cutthroat Trout, Whitebark Pine Nuts, and the significant reduction in the Yellowstone Northern Elk Herd have decreased the upward trajectory of this population of Grizzly Bears. In fact the population increase has been static for the last ten years while human caused threats identified have not been addressed. This has resulted in increased mortality that cannot sustain the population long term. Increased human population, especially to the north and east of Yellowstone National Park has resulted in increased hunting pressure on Elk resulting in Grizzly Bear deaths due to conflicts with Grizzly Bears during hunting season.	Population parameters	While I was the BLM Dillon Field Manager, I served as the Montana BLM representative to the IGBC Yellowstone Ecosystem Subcommittee for ten years (2002-2012). Great strides have been made in increasing the Yellowstone sub population of Grizzly Bears, however more work in needed to reduce threats to this population of Grizzly Bears. Reduced high value food supplies due to the loss of Yellowstone Cutthroat Trout, Whitebark Pine Nuts, and the significant reduction in the Yellowstone Northern Elk Herd have decreased the upward trajectory of this population of Grizzly Bears. In fact the population increase has been static for the last ten years while human caused threats identified have not been addressed. This has resulted in increased mortality that cannot sustain the population long term. Increased human population, especially to the north and east of Yellowstone National Park has resulted in increased hunting pressure on Elk resulting in Grizzly Bear deaths due to conflicts with Grizzly Bears during hunting season. Continued domestic sheep grazing on USDA public lands in the Centennial and Gravelly Mountains of Southwest Montana have resulted in Grizzly Bear deaths and are prohibiting the genetic connection between the Northern Continental Divide and Yellowstone Ecosystems. Sport hunting of the Yellowstone Grizzly Bear cannot be justified due to increase risks that are not addressed and increasing mortality of these bears. Funding to address these increasing risks are not available to either the three states nor to the federal land management agencies where these bears reside. Nor is it likely that funding will be made available to the states or federal land management agencies in the future to address these increasing risks. States don't even require hunters to carry bear spray while hunting big game in hunting units occupied by grizzly bears. Until there is a substantial increase in the efforts to reduce risks to the Yellowstone Grizzly Bear I don't believe the Yellowstone Grizzly should be delisted.	FWS-R6-ES-2016-0042-1958
There is absolutely no consensus on the size of the grizzly bear population in Yellowstone. There are some estimates, and all of those estimates are beset by bias of one sort or another. On the one hand you'll hear them claiming there's a thousand bears, based on use of one method. On the other hand they'll say there's 700 bears, based on the use of a different estimator altogether. The carrying capacity is not static, it's not a constant. It varies hugely, and I would argue that because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millennial drought which is promising more of the same to come, that we've seen a decline in carrying capacity. And so it's probably no surprise that the bear population is bumping its head up against carrying capacity. In fact, what we've had is a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods making them look outside of Yellowstone.	Population Parameters	Delisting of the Greater Yellowstone Grizzly Bear is just a political ploy to appease the state governments of Wyoming, Montana, and the "Trophy Hunting" community. A live Grizzly Bear is worth far economically to these states and communities adjacent to Yellowstone Park than the revenue from a hunting license and a Grizzly Bear rug hanging on some hunters wall. There is absolutely no consensus on the size of the grizzly bear population in Yellowstone. There are some estimates, and all of those estimates are beset by bias of one sort or another. On the one hand you'll hear them claiming there's a thousand bears, based on use of one method. On the other hand they'll say there's 700 bears, based on the use of a different estimator altogether. The carrying capacity is not static, it's not a constant. It varies hugely, and I would argue that because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millennial drought which is promising more of the same to come, that we've seen a decline in carrying capacity. And so it's probably no surprise that the bear population is bumping its head up against carrying capacity. In fact, what we've had is a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods making them look outside of Yellowstone. The turning over of Grizzly Bear management to the states surrounding is a gross mistake. Look how they managed Grey Wolves it is nothing but an attack to eliminate them. I think it is important to keep them listed up until we have had a chance to reform state wildlife management, because state management is such a poor alternative. It's a really poor alternative at a time when the population is becoming increasingly vulnerable. I am would be willing to predict is that if you wait two years out into the future using the exact same methods you're using now, the population estimate will be down to 600, at which point, even by your reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using your methods. Under a scenario like that, with the drivers afoot leading to elevated grizzly bear mortality as-is, I don't think we can afford to have any increase in mortality for any reason at all. There is another key reason that is being completely overlooked. None of your documents even acknowledge the spiritual importance to the Native American the significance of the Grizzly Bear to their culture. Doing so continues to keep Native Americans second class citizens in this country where all men are created equal	FWS-R6-ES-2016-0042-2000

I am would be willing to predict is that if you wait two years out into the future using the exact same methods you're using now, the population estimate will be down to 600, at which point, even by your reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using your methods. Under a scenario like that, with the drivers afoot leading to elevated grizzly bear mortality as-is, I don't think we can afford to have any increase in mortality for any reason at all.	Population parameters	Delisting of the Greater Yellowstone Grizzly Bear is just a political ploy to appease the state governments of Wyoming, Montana, and the "Trophy Hunting" community. A live Grizzly Bear is worth far economically to these states and communities adjacent to Yellowstone Park than the revenue from a hunting license and a Grizzly Bear rug hanging on some hunter's wall. There is absolutely no consensus on the size of the grizzly bear population in Yellowstone. There are some estimates, and all of those estimates are beset by bias of one sort or another. On the one hand you'll hear them claiming there's a thousand bears, based on use of one method. On the other hand they'll say there's 700 bears, based on the use of a different estimator altogether. The carrying capacity is not static, it's not a constant. It varies hugely, and I would argue that because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millennial drought which is promising more of the same to come, that we've seen a decline in carrying capacity. And so it's probably no surprise that the bear population is bumping its head up against carrying capacity. In fact, what we've had is a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods making them look outside of Yellowstone. The turning over of Grizzly Bear management to the states surrounding is a gross mistake. Look how they managed Grey Wolves it is nothing but an attack to eliminate them. I think it is important to keep them listed up until we have had a chance to reform state wildlife management, because state management is such a poor alternative. It's a really poor alternative at a time when the population is becoming increasingly vulnerable. I am would be willing to predict is that if you wait two years out into the future using the exact same methods you're using now, the population estimate will be down to 600, at which point, even by your reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using your methods. Under a scenario like that, with the drivers afoot leading to elevated grizzly bear mortality as-is, I don't think we can afford to have any increase in mortality for any reason at all. There is another key reason that is being completely overlooked. None of your documents even acknowledge the spiritual importance to the Native American the significance of the Grizzly Bear to their culture. Doing so continues to keep Native Americans second class citizens in this country where all men are created equal	FWS-R6-ES-2016-0042-2000
Wildlife studies show social stress plays an important role in reproduction among these mega predators. Their role in wild ecosystems is imperative.	Population parameters	The grizzly bear and gray wolf are American icons. Predators such as bears and wolves have built in population controls. Wildlife studies show social stress plays an important role in reproduction among these mega predators. Their role in wild ecosystems is imperative. As Aldo Leopold wrote after the last grizzly was killed in Arizona; "Little did we realize that we had toppled the spire of an edifice abuilding since the morning stars first sang together."	FWS-R6-ES-2016-0042-2003
700 is enough to remove you from the endangered list? That is insane, protect the grizzlies keep them on the list!	Population parameters	700 is enough to remove you from the endangered list? That is insane, protect the grizzlies keep them on the list!	FWS-R6-ES-2016-0042-2154
The great grizzly should be protected until their numbers reach 1,400.	Population parameters	I think this is unfortunate that hunters are always on the fringe to kill the enjoyment of others just because the animal steps outside the boundary. The great grizzly should be protected until their numbers reach 1,400. Then hunters can shoot them and get their picture taken with the bear. No, don't take them off the endangered list yet.	FWS-R6-ES-2016-0042-2185
Because the Grizzly population is becoming increasingly vulnerable, and because state wildlife management is such a poor alternative, and in dire need of reform, Mr. Mattson strongly opposes delisting.	Population parameters	Biologist: Yellowstone Grizzlies Can't Afford Any Increase In Mortality This was the response David Mattson, a retired bear biologist and ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone gave when asked whether the Yellowstone Grizzly population is big enough that it could sustain any mortality from sport hunting? David Mattson also disagrees with the USFWS's contention that the number of bears has reached the [Greater Yellowstone Ecosystem's] carrying capacity. To the contrary, Mr. Mattson argues that carrying capacity has in fact declined. He stated, "because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millennial drought which is promising more of the same to come, that we've seen a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods". He further added, "while we have seen an increase in the distribution of the bear population, probably by 30 to 40% since the early 2000s, at the same time, we haven't seen any increase in the population". Because the Grizzly population is becoming increasingly vulnerable, and because state wildlife management is such a poor alternative, and in dire need of reform, Mr. Mattson strongly opposes delisting. In light of these statistics, the decision to remove Greater Yellowstone Grizzlies from federal protection under the Endangered Species Act would be disastrous. As a taxpayer, as a frequent visitor to Yellowstone and as a great appreciator of the Grizzly Bears and their impact not only on the environment but our lives, I respectfully ask that you do not delist them.	FWS-R6-ES-2016-0042-2215
Their reproductive cycle is slow. Scarface, the most famous YNP bear was thought to have fathered 3 cubs in his entire 25 years. Only 3 cubs. If he fathered more, they certainly didn't survive.	Population Parameters	I'm writing because I oppose delisting the grizzly bear. I don't believe grizzlies have recovered to the point that the nation can afford to delist the bears and subject them to trophy hunters. Their reproductive cycle is slow. Scarface, the most famous YNP bear was thought to have fathered 3 cubs in his entire 25 years. Only 3 cubs. If he fathered more, they certainly didn't survive. Furthermore, I believe a buffer zone of safety needs to be established around parks where grizzly bears live. In spite of being on the protected list, several grizzly bears have been killed by hunters. All hunters should be mandated to carry bear spray and use it in the event of an unlikely encounter. Save the bullet, try bear spray first. Most hunters are good marksmen, so it wouldn't hurt to refrain from opening fire on a bear in close proximity. If the grizzly bear is delisted, we can expect hunters to bait grizzly in the backcountry where it is difficult to regulate laws. After wolves were taken off the protected list, a few hunters baited wolves just outside YNP's park boundary. This is NOT hunting. Yet I'm confident the same thing will happen if the grizzly bear is delisted. Carcasses will be left in random places by some hunters who are adamant about getting that bear. Please don't let big money influence this decision.	FWS-R6-ES-2016-0042-2273
Since the hunting of these animals can only be considered a trophy hunt and not a true food source, there is no need to rush to remove them from the endangered list. No human will go hungry if they are not allowed to hunt grizzly bears. Please wait for the bear population to not only increase but to thrive before considering the removal of them from the endangered species list! Thank you,	Population Parameters	It is my wish that the proposal to remove the grizzly bear from the endangered species list be denied. Further studies are needed to insure that this majestic animal is no longer in danger of extinction. With such a limited gene pool, lower numbers of bears can only in the long term hurt them and their chances not only for survival but to thrive as well. Since the hunting of these animals can only be considered a trophy hunt and not a true food source, there is no need to rush to remove them from the endangered list. No human will go hungry if they are not allowed to hunt grizzly bears. Please wait for the bear population to not only increase but to thrive before considering the removal of them from the endangered species list! Thank you,	FWS-R6-ES-2016-0042-2318
Grizzly Bears reproduce and replace their population slowly, and we have almost hunted them to extinction before.	Population parameters	I oppose vigorously the delisting of Grizzly Bears from the Federal List of Endangered and Threatened wildlife. In no way can you ever consider Grizzly Bears to be not endangered. There can be no justification for delisting them, no benefit to anybody except trophy hunters, certainly not a benefit to wildlife in America. Grizzly Bears reproduce and replace their population slowly, and we have almost hunted them to extinction before. Poaching is bad enough but sanctioned hunting would open doors that should remain firmly shut and locked. People have hunted many species of wild animals to extinction with dire effects on the wildlife food chains, and many more years of study are necessary before anyone can claim the loss of grizzly bears through hunting or other killing could be of any positive benefit. There is positive benefit to protecting them in that they are a part of our ecosystem, history and heritage, and their place in America serves purposes in the ecosystem and food chain that cannot be measured in black and white. In summary, I OPPOSE the proposed rule and urge Fish and Wildlife to continue protecting this majestic animal along with others that are vulnerable to trophy hunting to extinction.	FWS-R6-ES-2016-0042-2349
It took 40 years to get a little over 700 grizzly bears. If their fate is turned over to the states of Montana, Wyoming and Idaho those numbers will decrease very rapidly. If that happens, with their low reproduction rate, they may never recover. That would be a real shame.	Population Parameters	I strongly oppose the delisting of the Yellowstone grizzly bear. Why do you want to delist them? Their numbers have not increased in the last decade. Fifty or 60 of them are being killed each year even with Federal protection. Isn't this enough? Why do people need to trophy hunt them when so many people come to Yellowstone each year primarily to see grizzly bears? What do you think that is going to do to the economy of the border towns? It certainly isn't going to help them! The decision to delist them was reversed last time and probably will be this time if they are actually delisted. Why go through with this? reason is because it's a very bad idea. They are not ready to be delisted. It took 40 years to get a little over 700 grizzly bears. If their fate is turned over to the states of Montana, Wyoming and Idaho those numbers will decrease very rapidly. If that happens, with their low reproduction rate, they may never recover. That would be a real shame. These bears belong to the public, not to some hunters who want to mount their heads on a wall. In my opinion, this is being driven by political reasons, not by the desire to protect the grizzly bear population. I believe that the hunters and ranchers have exerted undue influence and are driving this. Please do NOT delist the grizzly bears!	FWS-R6-ES-2016-0042-2367
there are threats to their already slow reproductive rates that have not been adequately studied or addressed; including climate change. While some limited studies have shown that adequate alternate food sources may make up for the decline in white pine bark, the full effect on the ecosystem has not yet been realized.	Population Parameters	The delisting of the Grizzly bear from the endangered and threatened wildlife list would be detrimental to it's apparent recovery. Sufficient regulatory stipulations allowing the hunting of these animals does not exist, and would be expensive and cumbersome to enforce for states wildlife officials. There are no "buffer zones" preventing hunters from enticing roaming bears out of the National Park areas. Additionally, there are threats to their already slow reproductive rates that have not been adequately studied or addressed; including climate change. While some limited studies have shown that adequate alternate food sources may make up for the decline in white pine bark, the full effect on the ecosystem has not yet been realized. It is my opinion that delisting at this time would be a catastrophic mistake.	FWS-R6-ES-2016-0042-2371
Given the demonstrable and growing adverse effects of global warming on food sources bears rely upon, there is no justification for concluding that grizzly numbers have recovered sufficiently to remove this ecosystem's population from the protections of the ESA.	Population parameters	Delisting Yellowstone Grizzlies in 2016 is an ill-advised and premature proposal. There has not been enough preparation to secure adequate habitat protection for them, and I am appalled that FWS continually caves in to pressure from ranching interests and adjacent State governments to facilitate hunting and culling of wildlife populations. Given the demonstrable and growing adverse effects of global warming on food sources bears rely upon, there is no justification for concluding that grizzly numbers have recovered sufficiently to remove this ecosystem's population from the protections of the ESA. Grizzlies in the lower forty-eight states have a special significance for millions of American citizens. Their continued existence (along with wolves and cougars) as the apex predators of the increasingly constricted natural wildlife areas is extraordinarily important to most of us. Given the fact that FWS has already screwed up the reintroduction of buffalo and wolves to the Yellowstone ecosystem, this proposed delisting should be postponed for at least another five years.	FWS-R6-ES-2016-0042-2400
I acknowledge that the grizzly bear population has rebounded a bit from the extremely low numbers of about 100-200 in 1981 to about 717 grizzlies at last count, that rebound is not sufficient enough to potentially expose grizzlies to hunting. In the 35 year campaign, with an average growth of 14-17 bears per year to get current levels, if in one year 100 bears were hunted and killed, it would take another 5-7 years to get the population back to where it was the year before, if no bears are killed the following year.	Population parameters	I believe that removing grizzly bears from the federal list of endangered and threatened wildlife would be a catastrophic error in judgement. Although I acknowledge that the grizzly bear population has rebounded a bit from the extremely low numbers of about 100-200 in 1981 to about 717 grizzlies at last count, that rebound is not sufficient enough to potentially expose grizzlies to hunting. In the 35 year campaign, with an average growth of 14-17 bears per year to get current levels, if in one year 100 bears were hunted and killed, it would take another 5-7 years to get the population back to where it was the year before, if no bears are killed the following year. This I also believe that grizzlies, as well as other natural inhabitants in our great national parks, are still at risk due to a decline of favored foods, making the survival of the current grizzly bear population a bit precarious and may drop. Grizzly bears should continue to be protected, so please refrain from delisting the grizzly bears, as I am against this proposal.	FWS-R6-ES-2016-0042-2375

The Greater Yellowstone Ecosystem (GYE) population is much smaller than the Northern Range bears, but the Northern population is not being considered for de-listing. The GYE population is being threatened because industrial, energy, and development companies have been applying tremendous political pressure through lobbying and heavy-handed public relations campaigns (promising jobs, dismissing science; the usual stuff). A	Population parameters	De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, seasonable resilience, and availability throughout the habitat. The Greater Yellowstone Ecosystem (GYE) population is much smaller than the Northern Range bears, but the Northern population is not being considered for de-listing. The GYE population is being threatened because industrial, energy, and development companies have been applying tremendous political pressure through lobbying and heavy-handed public relations campaigns (promising jobs, dismissing science; the usual stuff). The GYE grizzlies are an "island population". This means that they are adapted to live and thrive within a specific geographic range. Substantial threats or changes to that habitat would likely pressure the bears to try and relocate, but they cannot successfully do so. The Greater Yellowstone Ecosystem is the environment to which they have adapted over eons. There is not another environment to which they could relocate and remain a viable species. Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability. US Fish and Wildlife data regarding the GYE grizzly population is suspect at best. For years, most counts of the population were in the 200 to 400 range. When de-listing was first proposed in 2007, the number suddenly shot up to 700. The methods used to arrive at that number involve a great deal of extrapolation from an extremely small sample of verified sightings. Rather than relying on US FWS data (pressured by lobbyists and hostile legislators), the public should demand research by independent organizations like The Ecological Society of America or the National Research Council. Current population estimates are untrustworthy, and the field needs good peer-reviewed analysis by objective scientists. If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it.	FWS-R6-ES-2016-0042-2542
Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability. A	Population parameters	De-listing will result in permanent loss of habitat. If Greater Yellowstone Ecosystem grizzlies lose their protected status, not only will they be in danger from hunting, their habitat will also be opened to fracking, oil and gas development, trophy homes, and mining. De-listing will also create a crisis for many other species that are sheltered because grizzly habitat is protected. Grizzlies' threatened critical food sources (like trout and white bark pines) cannot be effectively replaced by other sources that do not provide equivalent caloric value, seasonable resilience, and availability throughout the habitat. The Greater Yellowstone Ecosystem (GYE) population is much smaller than the Northern Range bears, but the Northern population is not being considered for de-listing. The GYE population is being threatened because industrial, energy, and development companies have been applying tremendous political pressure through lobbying and heavy-handed public relations campaigns (promising jobs, dismissing science; the usual stuff). The GYE grizzlies are an "island population". This means that they are adapted to live and thrive within a specific geographic range. Substantial threats or changes to that habitat would likely pressure the bears to try and relocate, but they cannot successfully do so. The Greater Yellowstone Ecosystem is the environment to which they have adapted over eons. There is not another environment to which they could relocate and remain a viable species. Further, the bears need a critical mass of population within a geographic range in order to sustain reproductive viability. US Fish and Wildlife data regarding the GYE grizzly population is suspect at best. For years, most counts of the population were in the 200 to 400 range. When de-listing was first proposed in 2007, the number suddenly shot up to 700. The methods used to arrive at that number involve a great deal of extrapolation from an extremely small sample of verified sightings. Rather than relying on US FWS data (pressured by lobbyists and hostile legislators), the public should demand research by independent organizations like The Ecological Society of America or the National Research Council. Current population estimates are untrustworthy, and the field needs good peer-reviewed analysis by objective scientists. If this population of grizzlies is lost or even substantially diminished, there will be catastrophic consequences for the entire ecosystem. That's why it's called an ecoSYSTEM. It all works together to maintain the balance of the flora, fauna, and even the physical geology of the Yellowstone region. Once that balance is disrupted, there will be no coming back. There's only a little bit of wild left in the world. Shame on us if we don't protect it.	FWS-R6-ES-2016-0042-2542
According to many scientists, federal protection makes it more likely that bears can continue to spread out into areas known to be suitable for bears. A wider range for the bear, could bring the Yellowstone population into contact with other grizzly populations, making all of the populations less vulnerable in the long haul to starvation, disease and their top predator - man.	Population parameters	The Grizzly Bear should not be removed from the Federal List of Endangered and Threatened Wildlife. The studies in the federal report recommending delisting have not undergone rigorous review by outside scientists and have not been published in scientific journals. This is considered a crucial step in validating scientific research and must not be skipped. Given the fact that the states are going to institute a sports hunt the minute the animal is removed from the list, and the death of Yellowstone's famous Grizzly, Scarface, by shotgun is proof that they can't wait for this to happen, and is another reason to leave the bear on the list. In addition to hunting bears for sport, ranchers will feel more free to kill bears and call them "nuisance animals". They must be protected from humans who will kill them simply to protect their financial interests. According to many scientists, federal protection makes it more likely that bears can continue to spread out into areas known to be suitable for bears. A wider range for the bear, could bring the Yellowstone population into contact with other grizzly populations, making all of the populations less vulnerable in the long haul to starvation, disease and their top predator - man.	FWS-R6-ES-2016-0042-2575
With all respect, if you remove the protections on Grizzlies at Yellowstone their numbers will go down due to hunting. And also, 700 bears is not a big number. By right there should be hundreds more.	Population parameters	With all respect, if you remove the protections on Grizzlies at Yellowstone their numbers will go down due to hunting. And also, 700 bears is not a big number. By right there should be hundreds more.	FWS-R6-ES-2016-0042-2624
In 2015 61 Bears died and we have seen a flat population for the last decade.	Population parameters	I feel this decision is premature and should not be made at this point in time. In 2015 61 Bears died and we have seen a flat population for the last decade.	FWS-R6-ES-2016-0042-2626
Grizzly bears have one of the lowest reproductive rates of any terrestrial mammal. A typical female will only produce 2 cubs once every 3 years, with good odds that one of the cubs will die before it reaches adulthood. Grizzly bears also have difficulty colonizing new habitats, primarily because female grizzlies tend to stay in or near their mother's range.	Population Parameters	I OPPOSE the delisting of the Grizzly Bears. "Why rush with a decision to delist, when all indicators are of a population that is vulnerable and positioned to decline even more than they already have?" - Dr. David Mattson Dr. Jane Goodall opposes delisting also. Yellowstone's grizzly bears have lost critically important foods. Since the early to mid-2000s, two of the four key grizzly bear foods, cutthroat trout and the seeds of whitebark pine, have collapsed. Drought, climate warming and predation by a nonnative trout have nearly extirpated cutthroat trout in Yellowstone Lake. Whitebark pine have been functionally wiped out by the spread of a non-native fungal disease and by a highly lethal and unprecedented climate-driven outbreak of bark beetles. Most elk populations have also declined some dramatically-- from highs reached during the 1990s and early 2000s. There is no doubt that food resources of Yellowstone's grizzly bears have declined and put the population at grave risk, with a prognosis of more of the same to come. State-level management of large carnivores is a problem. State wildlife management agencies in the West are locked down in an Iron Triangle that serves the minority special interests of those who want to kill deer, elk, moose, and bighorn sheep (i.e., ungulates). State agencies view large carnivores primarily as competitors for ungulates that could otherwise be on the market for sport hunting licenses, which are a major source of agency revenue. Sport hunting has been used during recent decades to drive down populations of mountain lions and wolves, and, accounts for roughly 70-80% of all deaths of adult carnivores in the region. Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals. Grizzly bears are vulnerable to the excesses of state-level wildlife management. Grizzly bears have one of the lowest reproductive rates of any terrestrial mammal. A typical female will only produce 2 cubs once every 3 years, with good odds that one of the cubs will die before it reaches adulthood. Grizzly bears also have difficulty colonizing new habitats, primarily because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates, and readily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. The US Fish & Wildlife Service cannot reliably assess the status of the Yellowstone population. Grizzly bears in Yellowstone's mountainous and forested wilderness are notoriously hard to count, whether live or dead. This means that the US Fish & Wildlife Service (USFWS) has resorted to using indirect indicators together with statistical adjustments to track the population. Recent research has shown that the methods used by the USFWS are not only unreliable, but also generate spurious results that increase the likelihood that the USFWS will erroneously conclude that the population has grown, when in fact, it has declined due to excessive numbers of deaths. Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. A bad situation will almost certainly worsen if Yellowstone's grizzlies are delisted and resources are not available to maintain current levels of monitoring. Attachments Dr. Mark Bekoff	FWS-R6-ES-2016-0042-2615

According to our State DNR, 15000 - 19000 black bears live in the U.P., or ~1 bear/square mile. That is 5 times more higher the number of grizzlies in Yellowstone (~700 bears/ 3468 sq.miles). Yet, we haven't seen a live bear in 20 years.	Population parameters	Please do not remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. Yellowstone grizzlies are a special population in a special place. Only there, with all of the protections, can novice wildlife enthusiasts glimpse a view of a grizzly bear in its natural habitat behaving as it might in real life, without fear of humans. I am from Michigan and camp every year in the Upper Peninsula near Seney. According to our State DNR, 15000 - 19000 black bears live in the U.P., or ~1 bear/square mile. That is 5 times more higher the number of grizzlies in Yellowstone (~700 bears/ 3468 sq.miles). Yet, we haven't seen a live bear in 20 years. We see plenty of bear hunters and bear hounds, but, ever since bear hunting became so popular, the only bears we see are dead ones strapped across the hoods of trucks. I know black bears are shy, but the high hunting pressure makes them flee all humans. It would be a crime for all future generations of Americans to allow the same thing to happen in Yellowstone. My only visit to Yellowstone was in 2002 when my family camped there for 10 days. In addition to bison and thermal features, we hoped to see a grizzly bear. And we did! We were fortunate enough to have 3 separate sightings of grizzlies high on a hill and ambling across a meadow. When the bear appeared, everyone and every vehicle stopped. We stood with total strangers, watching for over an hour until the bear moved on and out of sight. That was pure magic which all Americans should be allowed to experience. I read the proposed rule change and understand that hunting would be contingent upon what the states of Idaho, Montana and Wyoming do for management. Plus hunting would be away from areas of the park containing large numbers of visitors. But let's not be nave. Two things that will happen if the grizzly bears lose Federal protection. First, this population of bears has not been hunted in years. That means they do not have the learned survival and cautionary skills of other hunted animals. Grizzly bears are accustomed to being the top predator once they reach adulthood, which will make the Yellowstone bears 'sitting ducks'. Hunters "will" sit at the hunting boundaries waiting for bears to cross the line. A naive group of grizzlies is a trophy hunter's dream. What will stop hunting guides, who work for people like Walter Palmer, from luring trophy bears out of protected areas? Park Rangers won't be able to watch every hunting group. Without Endangered Species protection, a US version of Cecil the Lion *will* happen. Second, after the bears have been hunted for a season or two, they will learn. And they will avoid all humans as best as they can. Those magical sightings that my family was privileged to have will be lost to all future Americans. That would be a terrible crime violating the whole purpose the National Park of Yellowstone. Next, Yellowstone grizzly bears do not represent a threat to humans, so no change in management is needed. Let's compare Yellowstone human-bear conflicts with murder in the United States: A Yellowstone webpage states "Eight total human conflicts with grizzly bears occurred inside the park in 2013, compared to an average of 6 a year during 1990-2012. Six of the conflicts involved property damage, 1 resulted in a food reward, and 1 human injury occurred." Another Yellowstone webpage states Yellowstone has around 4 million visitors each year. That means the odds of having a bear conflict in 2013 with this population of bears was 8/4,000,000 =&gt; 0.0002% or 1 in 500,000, and the odds of an injury from a conflict were 1/4,000,000 =&gt; 0.000025% According to the FBI 2014 Crime in the US (I couldn't find 2013), the total number of murders in the U.S. was 11,961, and the nationwide total population then was 318 million. That means the odds of being murdered in 2014 was 11,961/318,000,000 =&gt; 0.003%. That means we're *15 times more likely to be murdered than have any kind of conflict with a Yellowstone grizzly bear*, and *120 times more likely to be murdered than to have an injury from a Yellowstone grizzly bear conflict*! Yellowstone grizzly bears are not a threat! The Park Service is doing a great job managing their grizzlies and their visitors. No management changes are needed. Facts: https://en.wikipedia.org/wiki/Killing_of_Cecil_the_lion https://www.nps.gov/yell/learn/nature/gbearinfo.htm https://www.nps.gov/yell/plan/yourvisit/visitationstats.htm http://www.census.gov/popclock/ https://www.fbi.gov/about-us/cjis/ucr/crime-in-the-u-s/2014/crime-in-the-u-s-2014/ Last, I do hunt grouse and deer, and favor most hunting. But I am vehemently against removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. Yellowstone grizzly bears are a special population that deserve protection for the benefit of all current and future Americans.	FWS-R6-ES-2016-0042-2659
FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS.	Population parameters	The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS. HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. In my opinion, HSUS is again correct. Look at the brutal treatment and killing contests involving wolves in these same three states. It is ugly and awful to be a Montanan who treasures wildlife and yet state governments want to use them for "sport" and as a profit center. FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS says, the agency says it looks forward to hearing from the public about delisting. The truth is, the public has already made it's views known; A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and fish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations." Like so many groups and interested members of the general public, I do NOT believe the FWS has the best interests of the public or OUR wildlife in mind with this proposal. It is simply yet another method of exploitation disguised as wildlife "management". I won't fall for it any longer!! PLEASE DO NOT DELIST THE GRIZZLY BEAR!	FWS-R6-ES-2016-0042-2695
Even if food sources are declining, wouldn't it make sense to assist the longterm survival of these and other food sources to support the population into the future. Allow natural attrition to lower numbers if necessary. Survival of the fittest, allow nature to decide. This way the viability of the species genetically will thrive. Climate change will of course affect the bear population. Maybe not in one year, but over time it will definitely have an effect. This could potentially hinder their breeding cycle and therefore numbers. For a slow reproving mammal this could be disastrous to the population.	Population parameters	Katrina, Australia. Even if food sources are declining, wouldn't it make sense to assist the longterm survival of these and other food sources to support the population into the future. Allow natural attrition to lower numbers if necessary. Survival of the fittest, allow nature to decide. This way the viability of the species genetically will thrive. Climate change will of course affect the bear population. Maybe not in one year, but over time it will definitely have an effect. This could potentially hinder their breeding cycle and therefore numbers. For a slow reproving mammal this could be disastrous to the population.	FWS-R6-ES-2016-0042-2774
The grizzly bears in the Yellowstone area had been removed from the list in 2007 but in 2009 a 9th Circuit federal judge ordered that they be put back on, citing the decline of the whitebark pine tree, whose pine cone nuts were seen as a critical part of the grizzly diet. However, the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered. Fact: Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said the reason the population is leveling out is that bear density has reached the carrying capacity for the range. Fact: the number of female grizzlies with cubs in the Yellowstone ecosystem was the highest ever recorded ever counted in 2013.	Population Parameters	According to Yellowstone National Park, over the last 40 years the grizzly population there has grown from 136 to a stable population of somewhere between 674 and 839 The recovery population goal was 500 and was actually met in 1999. The grizzly bears in the Yellowstone area had been removed from the list in 2007 but in 2009 a 9th Circuit federal judge ordered that they be put back on, citing the decline of the whitebark pine tree, whose pine cone nuts were seen as a critical part of the grizzly diet. However, the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered. Fact: Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said the reason the population is leveling out is that bear density has reached the carrying capacity for the range. Fact: the number of female grizzlies with cubs in the Yellowstone ecosystem was the highest ever recorded ever counted in 2013.	FWS-R6-ES-2016-0042-2745

Don't delist! Grizzlies need ESA protections in the GYA in order to maintain a viable population. Due to unpredictable food sources, effects from climate change and mostly the ever increasing presence of human visitation in the GYA, habitat fragmentation and livestock conflicts are already taking a toll on the grizzly population.	Population parameters	Don't delist! Grizzlies need ESA protections in the GYA in order to maintain a viable population. Due to unpredictable food sources, effects from climate change and mostly the ever increasing presence of human visitation in the GYA, habitat fragmentation and livestock conflicts are already taking a toll on the grizzly population. Delisting Grizzlies would allow hunting which would undoubtedly take place heavily just outside the borders of Yellowstone, further fragmenting the population to tend to stay within the park and consequently deal with unreliable food sources, or tend to go further away outside of the borders of Yellowstone towards the periphery where best science shows that due to mostly to human and livestock conflict Grizzlies would be unable to sustain a viable population.	FWS-R6-ES-2016-0042-2778
Delisting Grizzlies would allow hunting which would undoubtedly take place heavily just outside the borders of Yellowstone, further fragmenting the population to tend to stay within the park and consequently deal with unreliable food sources, or tend to go further away outside of the borders of Yellowstone towards the periphery where best science shows that due to mostly to human and livestock conflict Grizzlies would be unable to sustain a viable population.	Population parameters	Don't delist! Grizzlies need ESA protections in the GYA in order to maintain a viable population. Due to unpredictable food sources, effects from climate change and mostly the ever increasing presence of human visitation in the GYA, habitat fragmentation and livestock conflicts are already taking a toll on the grizzly population. Delisting Grizzlies would allow hunting which would undoubtedly take place heavily just outside the borders of Yellowstone, further fragmenting the population to tend to stay within the park and consequently deal with unreliable food sources, or tend to go further away outside of the borders of Yellowstone towards the periphery where best science shows that due to mostly to human and livestock conflict Grizzlies would be unable to sustain a viable population.	FWS-R6-ES-2016-0042-2778
the Yellowstone ecosystem lost 59 bears just last year due to human conflict. This loss is not sustainable given the grizzlies' exceedingly low reproductive rate. Rather than delisting, the agency should be cautious and determine whether this loss is a continuing trend and, if so, what its impact will be on the species' survival.	Population Parameters	Please reconsider the misguided and risky plan to delist Yellowstone area grizzly bears. Two out of three independent experts oppose removing grizzlies from the protections of the Endangered Species Act. These experts, instead, recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. According to these experts, of greatest concern to the populations' continued survival is habitat loss, habitat modification and human-caused grizzly mortality. Indeed, the Yellowstone ecosystem lost 59 bears just last year due to human conflict. This loss is not sustainable given the grizzlies' exceedingly low reproductive rate. Rather than delisting, the agency should be cautious and determine whether this loss is a continuing trend and, if so, what its impact will be on the species' survival. I agree with the majority of experts. The plan to delist grizzlies is not ready for prime time. If the agency insists on pushing this, it needs to significantly revise the proposed rule to address climate change, human-caused mortality, habitat fragmentation and more. It needs to add buffer zones and put a moratorium on hunting in place. Please listen to the experts - and not the local governors, livestock operations and hunters. Please keep grizzlies protected under the Endangered Species Act.	FWS-R6-ES-2016-0042-2791
When will science prevail in this debate on whether or not to de-list the grizzly? The recovery goal was set at 500. The current population averaged between 2002-2014 is at 674! Sounds like they are recovered to me if we look strictly at numbers. Grizzlies also occupy 84% of suitable habitat in the GYE, and are expected to soon occupy the remainder. Sounds recovered to me! The number of female grizzlies with cubs was the highest ever recorded in the GYE in 2013. Once again, given the preceding information, they sound recovered to me!	Population parameters	When will science prevail in this debate on whether or not to de-list the grizzly? The recovery goal was set at 500. The current population averaged between 2002-2014 is at 674! Sounds like they are recovered to me if we look strictly at numbers. Grizzlies also occupy 84% of suitable habitat in the GYE, and are expected to soon occupy the remainder. Sounds recovered to me! The number of female grizzlies with cubs was the highest ever recorded in the GYE in 2013. Once again, given the preceding information, they sound recovered to me! If anything, those that may be lucky enough to obtain one of the few permits that would be given out likely have high respect and regard for the grizzly. We prize and value those things in life that we are connected to. There is no greater connection to nature than to experience it first hand in a conservation NOT preservation-guided system. Please follow the science and de-list the grizzly bear. The GYE DPS is recovered beyond the original goals that were deemed sufficient to allow de-listing. What is the hold up??	FWS-R6-ES-2016-0042-2792
8. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. This means that the estimates of current population growth rates in the delisting plan will no longer apply after delisting. The population will decline after delisting, and cannot be sustained without life-support measures.	Population parameters	1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. Forest Service has not yet finalized its forest plan amendments. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Under the new Bush administration rules, forest plan standards will be discretionary, rather than mandatory. That means that the Forest Service will enforce the rules if it feels like it. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. These lands include some of the most threatened habitat in the GYE, especially by energy development in Wyoming. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear, and Forest Service funding is expected to decline. The Forest Service already lacks the necessary funds to monitor habitat, and this problem will get worse. No one knows where the additional monies will come from to pay for implementation of the delisting plan. 8. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. This means that the estimates of current population growth rates in the delisting plan will no longer apply after delisting. The population will decline after delisting, and cannot be sustained without life-support measures.	FWS-R6-ES-2016-0042-2754
FWS estimates around 700 grizzly bears live in the GYE. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS.	Population parameters	I am oppose to delisting of Yellowstone Grizzlies just as Dr. Goodall is. The science is flawed and trophy hunters want to kill these bears. These bears are worth more alive than dead. Grizzlies occupy only 1% of their historic range. This is not recovery. FWS estimates around 700 grizzly bears live in the GYE. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS.	FWS-R6-ES-2016-0042-2853

Grizzly deaths on rise in Montana The grizzly bear once roamed free throughout the Western states, including 52 of California's 58 counties. Abundant in the Central Valley and North Bay in the 1800s, California grizzlies were also seen feasting on decaying whale carcasses along the shores of Monterey Bay. The last grizzly in California was shot by hunters in the 1920s, although it remains the familiar icon on our state flag. In state after state, ranchers and hunters wiped out local populations, until they were isolated in but a few small ecological islands in Wyoming and Montana . A	Population parameters	Grizzly deaths on rise in Montana The grizzly bear once roamed free throughout the Western states, including 52 of California's 58 counties. Abundant in the Central Valley and North Bay in the 1800s, California grizzlies were also seen feasting on decaying whale carcasses along the shores of Monterey Bay. The last grizzly in California was shot by hunters in the 1920s, although it remains the familiar icon on our state flag. In state after state, ranchers and hunters wiped out local populations, until they were isolated in but a few small ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the greater Yellowstone population was estimated at 300 bears. Due to coordinated efforts by federal and state resources agencies mandated by the ESA, cooperative research, monitoring, habitat protections and regulatory mechanisms, including a strict hunting ban, their numbers have grown over the past 30 years to slightly more than 600 bears today, according to U.S. Fish and Wildlife's bear recovery coordinator, Chris Servheen. This is a success story that must be acknowledged and celebrated. However, there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development – golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst – playing with and nurturing their young, digging for grubs and hunting prey. Seeing a grizzly bear in the wild is usually an experience that remains with you for life. Having observed bears in Yellowstone on three occasions, and having once watched a bear being chased from a recent kill by a pair of wolves, I can attest that the American wildlife experience remains an elusive but reachable dream for most Americans. Vigilance and dedicated efforts are still needed to ensure that it remains in reach for our children and grandchildren. The Endangered Species Act has helped bring the grizzly bear back from the brink of extinction. The bears in the greater Yellowstone ecosystem need its help, and yours, to continue on their road to recovery.	FWS-R6-ES-2016-0042-2891
Grizzly bears' naturally slow reproductive rate, and loss of key food sources due to climate change, make delisting them a recipe for disaster.	Population Parameters	Please don't delist the grizzly bears from the Endangered Species list. Some grizzlies, like Scarface, are already being illegally killed! The only reason to delist them would be so trophy hunters can have fun killing them, and to decorate their houses with bear rugs or put their heads on their walls. I don't think that's a good enough reason. Grizzly bears' naturally slow reproductive rate, and loss of key food sources due to climate change, make delisting them a recipe for disaster.	FWS-R6-ES-2016-0042-2942
Given that grizzlies reproduce slowly and that cub mortality is high (65% for cubs and 40% for yearlings) they will be further stressed if the states, as they have signaled, allow trophy hunting.	Population Parameters	I oppose the proposed delisting of grizzly bears outside of Yellowstone. Currently, the Greater Yellowstone Ecosystem population is at roughly 2% of its historic range. The bears are still vulnerable due to a host of threats, including habitat loss and loss of food sources. Given that grizzlies reproduce slowly and that cub mortality is high (65% for cubs and 40% for yearlings) they will be further stressed if the states, as they have signaled, allow trophy hunting. The experience with the Florida bear hunt in which juveniles and parenting females were killed makes it clear that we cannot expect those participating in hunts to abide by any rules against killing the next generation of bears. In addition, the Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely.	FWS-R6-ES-2016-0042-2960
Currently, the Greater Yellowstone Ecosystem population is at roughly 2% of its historic range. The bears are still vulnerable due to a host of threats, including habitat loss and loss of food sources. Given that grizzlies reproduce slowly and that cub mortality is high (65% for cubs and 40% for yearlings) they will be further stressed if the states, as they have signaled, allow trophy hunting.	Population parameters	I oppose the proposed delisting of grizzly bears outside of Yellowstone. Currently, the Greater Yellowstone Ecosystem population is at roughly 2% of its historic range. The bears are still vulnerable due to a host of threats, including habitat loss and loss of food sources. Given that grizzlies reproduce slowly and that cub mortality is high (65% for cubs and 40% for yearlings) they will be further stressed if the states, as they have signaled, allow trophy hunting. The experience with the Florida bear hunt in which juveniles and parenting females were killed makes it clear that we cannot expect those participating in hunts to abide by any rules against killing the next generation of bears. In addition, the Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely.	FWS-R6-ES-2016-0042-2960
Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection of the Threatened and Endangered Species act. Removing T&E protection and placing it in the hands of the three states of Idaho, Montana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered.	Population Parameters	My comment is included in the uploaded file. Attachments 5-4-16GrizzCommentFinal	FWS-R6-ES-2016-0042-2973
Firstly it notes that the population has grown between zero and 2.2% from 2002 to 2012. Meaning minimal growth. Your own scientists are telling you that the population is static at bestSecondly -Assuming there are 714 grizzlies in 2016, which IBSGT state is the number. 27% of these are females of 5 and over that can give birth to young. They give birth to an average of 2 cubs every 3 years. The survival rate of the cubs is 55%. So that gives a population increase of 59 bears per year.714 @ 27% = 192 reproducing females, 192/3 = 64 bears giving birth in a year, Average 2 cubs per cycle = 108, Survival rate of 55% = 59 young bears born and survive each year.	Population parameters	I oppose removing the GYE Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife With current birth rates and mortality rates, the grizzly bear population is in decline. More bears are being killed than are being born. The numbers I use below are taken from an IBSGT study in September 2012 ("Updating and evaluating approaches to estimate population size and sustainable mortality limits for Grizzly bears in the Greater Yellowstone Ecosystem" - http://nrmcs.usgs.gov/files/norock/IGBST/GYEGBMortWksRpt2012(2).pdf) Firstly it notes that the population has grown between zero and 2.2% from 2002 to 2012. Meaning minimal growth. Your own scientists are telling you that the population is static at best Secondly -Assuming there are 714 grizzlies in 2016, which IBSGT state is the number. 27% of these are females of 5 and over that can give birth to young. They give birth to an average of 2 cubs every 3 years. The survival rate of the cubs is 55%. So that gives a population increase of 59 bears per year. 714 @ 27% = 192 reproducing females, 192/3 = 64 bears giving birth in a year, Average 2 cubs per cycle = 108, Survival rate of 55% = 59 young bears born and survive each year. Thirdly, the mortality rate of 61 in 2015 (https://www.usgs.gov/data-tools/2015-known-and-probable-grizzly-bear-mortalities-greater-yellowstone-ecosystem) does include some of these cubs (10 to be exact) so it would be double counting to say the birth rate minus the death rate is a true number. But the report also states that 1 bear dies for 2 that are documented, so 61 deaths could be something like 90 deaths. The mortality rate is likely to increase. The very high mortality rate of 2015 will become the rule, not the exception. And that's before delisting and before hunting is allowed. There are minimal investigations into bear killings, and minimal deterrents (fines, imprisonment). Hunters and ranchers are killing bears with impunity. For example the killer of "Scarface" is still not known. In addition there are increased killing of conflict bears by USFWS and the Game & Fish departments as bears look for food further afield. In summary 59 bears born and survive each year and a mortality rate of around 90 means the population is declining and will continue to decline. I oppose removing the GYE Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife	FWS-R6-ES-2016-0042-2989
Grizzly bears are a slow-to-reproduce species one of the slowest in the animal kingdom. For instance, a mother grizzly bear spends up to four years raising and provisioning her young teaching them how to be bears. It's a huge investment of time, but if their mother gets killed by a trophy hunter, the her cubs will die from starvation or predation.	Population parameters	Grizzly bears are a slow-to-reproduce species one of the slowest in the animal kingdom. For instance, a mother grizzly bear spends up to four years raising and provisioning her young teaching them how to be bears. It's a huge investment of time, but if their mother gets killed by a trophy hunter, the her cubs will die from starvation or predation. Yellowstone grizzly bears should not be delisted because if they are, they will be subject to trophy hunting by the states of Wyoming, Montana and Idaho, which have already divided up the percentages of bears that can be hunted. Grizzly bear are a majestic species worth far more alive than dead. They bring tens of millions of dollars to the Northern Rockies states' economies each year. More than 4 million visitors went to Yellowstone and Grand Teton national parks in 2015 alone. Last year, Wyoming realized \$1.1 billion from national park-related revenues. This money helps a lot more people in these states. If someone shoots a grizzly bear, others cannot view or photograph it. Trophy hunters will stuff their dead bears, put their heads over their mantelpieces or turn them into bear skin rugs. That's just wrong. Wildlife belong to us all not just rich trophy hunters. Yellowstone grizzly bears need more protections not less right now, because their major staples, whitebark pine seeds and Yellowstone cutthroat trout, have declined precipitously. Please retain Yellowstone's grizzly bears on the Endangered Species List.	FWS-R6-ES-2016-0042-3002

Merely because a small group of consumptive wildlife killers desire to kill North American wildlife, is NOT a reason to rush delisting, before the population can clearly be understood to be self-sustaining over 40 or 100 more generations.	Population Parameters	1. At present the Yellowstone area Grizzlies do NOT have a robust connection to any larger metapopulation in order to maintain or increase heterozygosity. This means that it is SURE that the small populatio will slowly trend to homozygosity - inbreeding vulnerabilities. 2. Wyoming and other states attempt consistently to use public sport hunting to manage wildlife - this practice does NOT affect any population in a naturally-selected manner, and due to the small population, increases the likelihood of removing the healthy members of any population. In the case of the grizzly bear, this practice would immediately cause the viable healthy component members to decrease in relation to the whole. NO state dshould be allowed to manage small predator populations, as the selection is artificial, not relating to heterozygosity, individual health, age, or any other parameter which nature normally selects - it is thus catastrophic in effect. The populatin, isolated aas it is, cannot sustain catastrophic human exploitation. Predators are not selected for human culling, attack, exploitation, and such activity would change the nature of the grizzly in ways most likely deleterious to the species and its trophic niche. 3. Wyoming has counties who already attempt to limit the species, by laws against grizzly in county, EVEN IF THAT AREA IS FEDERAL PUBLIC LAND. This decreases habitat and connectivity, and the act of delisting will cause a sudden change - a diminution - of viable habitat. the plan does NOT take this into account. 4. Yellowstone National Park where the grizzly was concentrated is high plateau, and is increasingly subject to biological effects of global warming - the longer nonfreezing days have caused a whitebark pine die-off, sending the grizzly already fromn the protected habitat outward to seek other forage. Thus the core population, relatively unknown due to the animal itself, has most likely fallen. The population estimates of Seervheen and others is almost certainly higher than actual numbers. Because of these issues, it will remain premature to delist the grizzly bear UNTIL robust habitat connectivity (with NO human take within those corridors) is created. The obama administration has consistently attempted to kill off large predators through political corruption in using political deals to get their party into office. The republican party corruptly attempts to delist endangered species for private and corporate exploitation. These are profoundly unethical reasons for present and past removals and attempts to remove large predators from ESL while they are still at numbers far lower than population modeling well-supported by experiment and consensus, suggest that a proper number of individuals preventing trend to homozygosity, are. Merely because a small group of consumptive wildlife killers desire to kill North American wildlife, is NOT a reason to rush delisting, before the population can clearly be understood to be self-sustaining over 40 or 100 more generations. The ONLY conditions under which delisting can ethically and ecologically be accepted is if NO public hunting, ever, is allowed of this species not adapted to humans with guns, fences, exclusionary rules of any sort - NO low population goals - the mandate of every state with wildlife - can be accepted, as this species has far too low a reproductive capacity. Grizzly bears must NOT be subjected to state regulation or state, county, or local law. Federal public lands must NOT be subject to such laws if predators like grizzly bears are delisted. I have been a repeated visitor to Yellowstone, the only natinoal park in the lower 48, where grizzlies can be easily seen, and I do NOT wish that island of safety to by a mere zoo for a few dying-out populatio remnants. EVERY national park is now surrounded by individuals and moneymaking "outfitters" whose sole intent is to kill America's wildlife. Unless these people are excluded fromm ALL federal public lands, NO delisting of grizzly bears, wolves, elk, bison, lynx, mountain lion, coyote, fisher, pronghorn, mule deer, hawk, eagle owl, marten, wolverine, wolf, or any other species disconnected by public hunting or trapping, can be unprotected on our last public lands. I have closely visited national forests and BLM lands in Wyoming, Idaho, Montana, Oregon, California and Nevada, and the devastation and degradatino done by excessive vehicles, the danger to the public during hunting 'seasons' and the excessive roading, and othr human exploitation has permanently endangered all large and many smaller animals. Since grizzlies need large areas per individual and individuals remain in a territory, public hunting will destory the species, continually eradicating bears in places presently safe to occupy. there can be NO delisting, due to the psychotic lust to kill for pleasure which once and will again devastate the species.	FWS-R6-ES-2016-0042-2990
GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. Å	Population parameters	Please do NOT delist the grizzlies. -Trophy hunting of the grizzly is not sound management of the species. There should be a three to five year moratorium on even considering hunting as a management tool. -- GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. -The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. - MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it.	FWS-R6-ES-2016-0042-3011
The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time.	Population parameters	I oppose Yellowstone grizzly bear delisting. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Indeed, at the recent announcement of the delisting proposal, Senator Larry Craig used the opportunity to call for weakening the Endangered Species Act. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources.	FWS-R6-ES-2016-0042-3010
there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals.	Population parameters	Plans by the Bush administration to remove the grizzly bear from federal Endangered Species Act protection threaten to reverse a 30-year recovery that has resulted in doubling the bears' population in the greater Yellowstone ecosystem. If left to "management" by the states, trophy hunting of these magnificent animals in places like Wyoming and Montana will likely follow. While their numbers have risen to more than 600 individuals, the bears are geographically isolated, and threats to their habitat and food supplies are daunting. Most environmental groups, including the Sierra Club and the Natural Resources Defense Council, as well as wildlife biologists, are urging the U.S. Fish and Wildlife Service to abandon the delisting plan as premature. The grizzly bear once roamed free throughout the Western states, including 52 of California's 58 counties. Abundant in the Central Valley and North Bay in the 1800s, California grizzlies were also seen feasting on decaying whale carcasses along the shores of Monterey Bay. The last grizzly in California was shot by hunters in the 1920s, although it remains the familiar icon on our state flag. In state after state, ranchers and hunters wiped out local populations, until they were isolated in but a few small ecological islands in Wyoming and Montana. When grizzlies were listed as "threatened" in 1975, the greater Yellowstone population was estimated at 300 bears. Due to coordinated efforts by federal and state resources agencies mandated by the ESA, cooperative research, monitoring, habitat protections and regulatory mechanisms, including a strict hunting ban, their numbers have grown over the past 30 years to slightly more than 600 bears today, according to U.S. Fish and Wildlife's bear recovery coordinator, Chris Servheen. This is a success story that must be acknowledged a nd celebrated. However, there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, digging for grubs and hunting prey. Seeing a grizzly bear in the wild is usually an experience that remains with you for life. The Endangered Species Act has helped bring the grizzly bear back from the brink of extinction. The bears in the greater Yellowstone ecosystem need its help, and yours, to continue on their road to recovery.	FWS-R6-ES-2016-0042-3004
A moderate increase does not mean the Grizzly population is saved, all it shows is the conservation efforts in place have had a positive impact. Disease, drought and fire could easily reduce the population to zero. The Greater Yellowstone Ecosystem Population of Grizzly Bears are not out of the woods yet. Extinction is a real threat and the population still needs to grow and flourish before the FWS and Science can declare the Grizzly out of danger of becoming extinct.	Population parameters	I am shocked and appalled (but not surprised) that the FWS is considering removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. Why am I not surprised? Many members of the US FWS are Trophy Hunters, which I consider to be an obvious conflict of interest. FWS members should be impartial and unbiased. Their decisions should be driven by science and fact and not prejudiced by personal views. How can an FWS member claim to be unbiased and at the same time consider the insatiable bloodlust of a Trophy Hunt a Sport? It has taken over FOUR DECADES to see a modest bump in the Greater Yellowstone Ecosystem Population of Grizzly Bears. A moderate increase does not mean the Grizzly population is saved, all it shows is the conservation efforts in place have had a positive impact. Disease, drought and fire could easily reduce the population to zero. The Greater Yellowstone Ecosystem Population of Grizzly Bears are not out of the woods yet. Extinction is a real threat and the population still needs to grow and flourish before the FWS and Science can declare the Grizzly out of danger of becoming extinct. Keep the Greater Yellowstone Ecosystem Population of Grizzly Bears on the Federal List of Endangered and Threatened Wildlife. Instead of delisting the Grizzly, restrict Yellowstone visitors from camping in certain areas of the park. Humans aren't endangered, but the Grizzlies ARE.	FWS-R6-ES-2016-0042-3031

According to statistics, at one time, grizzly bears ranged from northern Mexico to Alaska. In the early 1800s, as many as 50,000 grizzlies were found in the lower 48 states. Through hunting, humans have largely killed them off. Human-caused mortality is the single largest contributor of bear deaths. Today, their number has dropped to between 1,400 and 1,700. Of these numbers, only 674 to 839 are believed to be in the GYE in 2014. Even that small number may be an over-count, according to some biologists.	Population parameters	I am very disturbed to hear that the US Fish & Wildlife Service is considering the delisting of grizzly bears in the Great Yellowstone Ecosystem (GYE). According to statistics, at one time, grizzly bears ranged from northern Mexico to Alaska. In the early 1800s, as many as 50,000 grizzlies were found in the lower 48 states. Through hunting, humans have largely killed them off. Human-caused mortality is the single largest contributor of bear deaths. Today, their number has dropped to between 1,400 and 1,700. Of these numbers, only 674 to 839 are believed to be in the GYE in 2014. Even that small number may be an over-count, according to some biologists. We must protect these grizzly bears from extinction. If Federal protections are removed, state managers will open hunting seasons on GYE grizzly bears. The Idaho, Montana, and Wyoming wildlife managers will be responsible for what happens to these grizzlies. Many federal judges themselves have commented on how poorly these managers handled the wolf situation in their areas. These same state managers will also decide what types of hunting methods will be allowed. We must fight off any attempt to allow cruel and unsporting methods, such as hunting over bait and chasing bears with packs of GPS collared hounds. Trophy hunters, outfitters and guides, as well as livestock producers have been calling for grizzly hunting seasons for years. In fact, these wildlife managers have already laid plans to parcel out the GYE grizzlies to trophy hunters if they are delisted. Allowing these bears to be hunted would not only result in the direct deaths of the grizzlies who end up as rugs, but also the bears who escape the hunt and die from related injuries, as well as orphaned cubs unable to survive on their own. When hunting is allowed during the Fall, when the grizzlies are eating heavily to gain weight for hibernation, this costs the bears precious energy. This cost early in a female's life may negatively impact a lifetime of reproduction. Hunting directly affects population growth rates and can indirectly affect sex and age structure of a population and change social organization. Hunting causes greater changes in a population than do natural processes. Sixty percent of prominent grizzly bear scientists "believe delisting would be an incorrect decision, or at the very least a violation of the precautionary principle." Who are we to argue with the experts? Climate change and the loss of important food sources also concern bear biologists. If the cause of these beautiful animals is not enough to trouble you and persuade you to support their interests, keep in mind that Millions of grizzly-bear watching tourists spend tens of millions of dollars each year benefitting the local economies of the Northern Rockies. With the loss of its bears, Yellowstone National Park could lose \$10 million tourism dollars annually. (Source: Wilkinson, Todd. 2015. What's Next for Yellowstone's Grizzlies? National Geographic. October 1)	FWS-R6-ES-2016-0042-3100
There are too many unknowns right now, regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population. Why not wait five years to see how the population is responding to these threats?	Population Parameters	PART 2 OF OUR OFFICIAL COMMENT: -In Wyoming, Montana and Idaho, the snow pack was average and the temperatures high for this time of year. Acknowledging the possible threat of wildfires in the Greater Yellowstone ecosystem as was experienced in Glacier National Park this past year would be catastrophic for the grizzlies. -What's the rush? There are too many unknowns right now, regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population. Why not wait five years to see how the population is responding to these threats? -Grizzly bears have one of the lowest reproductive rates of all terrestrial mammals in North America. This is due to numerous ecological factors. Grizzly bears do not reach sexual maturity until they are at least five years old. Once mated with a male in the summer, the female delays embryo implantation until hibernation, during which miscarriage can occur if the female does not receive the proper nutrients and caloric intake. On average, females produce two cubs in a litter and the mother cares for the cubs for up to two years, during which time the mother will not mate. Once the young leave or are killed, females may not produce another litter for three or more years, depending on environmental conditions. Male grizzly bears have large territories, finding a female scent difficult in such low population densities. Population fragmentation of grizzlies may destabilize their number. The grizzly bear has several relationships with its ecosystem. One such relationship is a mutualistic relationship with fleshy-fruit bearing plants. After the grizzly consumes the fruit, the seeds are excreted and thereby dispersed in a germinable condition. Some studies have shown germination success is indeed increased as a result of seeds being deposited along with nutrients in feces. This makes grizzly bears important seed distributors in their habitats. While foraging for tree roots, plant bulbs, or ground squirrels, bears stir up the soil. This process not only helps grizzlies access their food, but also increases the species richness in alpine ecosystems. An area that contains both bear digs and undisturbed land has greater plant diversity than an area that contains just undisturbed land. Along with increasing species richness, soil disturbance causes nitrogen to be dug up from lower soil layers, and makes nitrogen more readily available in the environment. An area that has been dug by the grizzly bear has significantly more nitrogen than an undisturbed area. Grizzlies directly regulate prey populations and also help prevent overgrazing in forests by controlling the populations of other species in the food chain. An experiment in Grand Teton National Park in Wyoming showed that the removal of wolves and grizzly bears caused populations of their herbivorous prey to increase. This, in turn, changed the structure and density of plants in the area, which decreased the population sizes of migratory birds. This provides evidence that grizzly bears represent a keystone predator, having a major influence on the entire ecosystem they inhabit. One of the most important points to also include is that upon further research we do NOT feel that the Endangered Species Act is being followed as far as the NECESSARY CRITERIA HAS NOT BEEN MET TO INSURE THE SUSTAINABILITY OF THE GRIZZLY IN THE GREATER YELLOWSTONE REGION in the delisting of an endangered species from the list. It is sad that this proposed delisting is political based and not science based. At this time, in reflection of the above points we have made in both part one and part two, regarding the proposed delisting of the Grizzly, we DO NOT agree with the proposal to delist the Grizzly in the Greater Yellowstone Region and urge USFWS to postpone this proposal to delist them at this time. On behalf of the 56,107 members of the Network Groups: Heart of the Wild Yellowstone Vote4Wilderness Save Bears Now Southern Colorado Environmental Council Save Wyoming Wolves Now Save Wolves Now Network community All Animals Deserve to Live Keep Wolves Alive community Running with Wolves, Wildlife and Natives Wolves Living Free, Respected and Protected Campaign for Yellowstone's Wolves Canadian and American Grassroots for Wolves	FWS-R6-ES-2016-0042-3155
Grizzly bears have one of the lowest reproductive rates of all terrestrial mammals in North America. This is due to numerous ecological factors. Grizzly bears do not reach sexual maturity until they are at least five years old. Once mated with a male in the summer, the female delays embryo implantation until hibernation, during which miscarriage can occur if the female does not receive the proper nutrients and caloric intake. On average, females produce two cubs in a litter and the mother cares for the cubs for up to two years, during which time the mother will not mate. Once the young leave or are killed, females may not produce another litter for three or more years, depending on environmental conditions. Male grizzly bears have large territories, finding a female scent difficult in such low population densities. Population fragmentation of grizzlies may destabilize their number.	Population Parameters	PART 2 OF OUR OFFICIAL COMMENT: -In Wyoming, Montana and Idaho, the snow pack was average and the temperatures high for this time of year. Acknowledging the possible threat of wildfires in the Greater Yellowstone ecosystem as was experienced in Glacier National Park this past year would be catastrophic for the grizzlies. -What's the rush? There are too many unknowns right now, regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population. Why not wait five years to see how the population is responding to these threats? -Grizzly bears have one of the lowest reproductive rates of all terrestrial mammals in North America. This is due to numerous ecological factors. Grizzly bears do not reach sexual maturity until they are at least five years old. Once mated with a male in the summer, the female delays embryo implantation until hibernation, during which miscarriage can occur if the female does not receive the proper nutrients and caloric intake. On average, females produce two cubs in a litter and the mother cares for the cubs for up to two years, during which time the mother will not mate. Once the young leave or are killed, females may not produce another litter for three or more years, depending on environmental conditions. Male grizzly bears have large territories, finding a female scent difficult in such low population densities. Population fragmentation of grizzlies may destabilize their number. The grizzly bear has several relationships with its ecosystem. One such relationship is a mutualistic relationship with fleshy-fruit bearing plants. After the grizzly consumes the fruit, the seeds are excreted and thereby dispersed in a germinable condition. Some studies have shown germination success is indeed increased as a result of seeds being deposited along with nutrients in feces. This makes grizzly bears important seed distributors in their habitats. While foraging for tree roots, plant bulbs, or ground squirrels, bears stir up the soil. This process not only helps grizzlies access their food, but also increases the species richness in alpine ecosystems. An area that contains both bear digs and undisturbed land has greater plant diversity than an area that contains just undisturbed land. Along with increasing species richness, soil disturbance causes nitrogen to be dug up from lower soil layers, and makes nitrogen more readily available in the environment. An area that has been dug by the grizzly bear has significantly more nitrogen than an undisturbed area. Grizzlies directly regulate prey populations and also help prevent overgrazing in forests by controlling the populations of other species in the food chain. An experiment in Grand Teton National Park in Wyoming showed that the removal of wolves and grizzly bears caused populations of their herbivorous prey to increase. This, in turn, changed the structure and density of plants in the area, which decreased the population sizes of migratory birds. This provides evidence that grizzly bears represent a keystone predator, having a major influence on the entire ecosystem they inhabit. One of the most important points to also include is that upon further research we do NOT feel that the Endangered Species Act is being followed as far as the NECESSARY CRITERIA HAS NOT BEEN MET TO INSURE THE SUSTAINABILITY OF THE GRIZZLY IN THE GREATER YELLOWSTONE REGION in the delisting of an endangered species from the list. It is sad that this proposed delisting is political based and not science based. At this time, in reflection of the above points we have made in both part one and part two, regarding the proposed delisting of the Grizzly, we DO NOT agree with the proposal to delist the Grizzly in the Greater Yellowstone Region and urge USFWS to postpone this proposal to delist them at this time. On behalf of the 56,107 members of the Network Groups: Heart of the Wild Yellowstone Vote4Wilderness Save Bears Now Southern Colorado Environmental Council Save Wyoming Wolves Now Save Wolves Now Network community All Animals Deserve to Live Keep Wolves Alive community Running with Wolves, Wildlife and Natives Wolves Living Free, Respected and Protected Campaign for Yellowstone's Wolves Canadian and American Grassroots for Wolves	FWS-R6-ES-2016-0042-3155
Stable and healthy populations are determined by genetic diversity, the proportion of females of reproductive age, population trends, and the quality of habitat. However, in the last decade, the GYE has essentially lost all its whitebark pine to the combination of the non-native blister rust and enormous outbreaks of mountain pine beetle, both exacerbated by climate change. Meanwhile, droughts and competition from non-native lake trout have extirpated westslope cutthroat trout from Yellowstone Lake. While many bear populations may adapt to climate change fairly easily, the GYE grizzlies are losing so many crucial food resources at the same time.	Population parameters	I oppose the delisting of the Greater Yellowstone Ecosystem grizzly bear population at this time. While the population has increased since it was listed as threatened under the Endangered Species Act, simply the number of bears in a population alone does not necessarily indicate a stable or healthy population. Stable and healthy populations are determined by genetic diversity, the proportion of females of reproductive age, population trends, and the quality of habitat. However, in the last decade, the GYE has essentially lost all its whitebark pine to the combination of the non-native blister rust and enormous outbreaks of mountain pine beetle, both exacerbated by climate change. Meanwhile, droughts and competition from non-native lake trout have extirpated westslope cutthroat trout from Yellowstone Lake. While many bear populations may adapt to climate change fairly easily, the GYE grizzlies are losing so many crucial food resources at the same time. Grizzlies are among the slowest reproducing land mammals in North America, and it can take a long time for declining populations to recover, especially with decreasing food resources. Due to declines in key food sources and with loss and degradation of available habitat, I oppose the removal of the GYE grizzly population from the list of threatened species at this time. While the current delisting proposal does address declines in whitebark pine, it fails to consider the significance of the whitebark pine nut to the GYE grizzly bear population. Whitebark pine nuts are a high protein food source that once was abundant in the GYE and offered a concentrated food source requiring low caloric output. While bears are amazingly adaptable omnivores, they depend on abundant food resources to sustain them through both the months when they are active and through winter hibernation. There is no readily available alternative equivalent to the whitebark pine nut in the GYE. At the same time, grizzly habitat is being converted to residential subdivisions, ranches, and resorts, and as grizzlies set out to explore food resources in other areas, they meet up more and more with humans, often to their own demise. Army cutworm moths, another key food source that could potentially serve as an alternative lives high in the alpine, and their populations are vulnerable to climate change and exposure to pesticides. I applaud the conservation and management efforts that are successfully moving the Greater Yellowstone grizzly population toward recovery, but delisting the population at this time is premature. Attachments Comment GYE Grizzly	FWS-R6-ES-2016-0042-5415

Grizzlies are among the slowest reproducing land mammals in North America, and it can take a long time for declining populations to recover, especially with decreasing food resources. Due to declines in key food sources and with loss and degradation of available habitat, I oppose the removal of the GYE grizzly population from the list of threatened species at this time.	Population parameters	I oppose the delisting of the Greater Yellowstone Ecosystem grizzly bear population at this time. While the population has increased since it was listed as threatened under the Endangered Species Act, simply the number of bears in a population alone does not necessarily indicate a stable or healthy population. Stable and healthy populations are determined by genetic diversity, the proportion of females of reproductive age, population trends, and the quality of habitat. However, in the last decade, the GYE has essentially lost all its whitebark pine to the combination of the non-native blister rust and enormous outbreaks of mountain pine beetle, both exacerbated by climate change. Meanwhile, droughts and competition from non-native lake trout have extirpated westslope cutthroat trout from Yellowstone Lake. While many bear populations may adapt to climate change fairly easily, the GYE grizzlies are losing so many crucial food resources at the same time. Grizzlies are among the slowest reproducing land mammals in North America, and it can take a long time for declining populations to recover, especially with decreasing food resources. Due to declines in key food sources and with loss and degradation of available habitat, I oppose the removal of the GYE grizzly population from the list of threatened species at this time. While the current delisting proposal does address declines in whitebark pine, it fails to consider the significance of the whitebark pine nut to the GYE grizzly bear population. Whitebark pine nuts are a high protein food source that once was abundant in the GYE and offered a concentrated food source requiring low caloric output. While bears are amazingly adaptable omnivores, they depend on abundant food resources to sustain them through both the months when they are active and through winter hibernation. There is no readily available alternative equivalent to the whitebark pine nut in the GYE. At the same time, grizzly habitat is being converted to residential subdivisions, ranches, and resorts, and as grizzlies set out to explore food resources in other areas, they meet up more and more with humans, often to their own demise. Army cutworm moths, another key food source that could potentially serve as an alternative lives high in the alpine, and their populations are vulnerable to climate change and exposure to pesticides. I applaud the conservation and management efforts that are successfully moving the Greater Yellowstone grizzly population toward recovery, but delisting the population at this time is premature. Attachments Comment GYE Grizzly	FWS-R6-ES-2016-0042-5415
Groups including the Sierra Club, Defenders of Wildlife, the Humane Society, the Center for Biological Diversity and the Natural Resource Defense Council all released statements saying the delisting was "premature". They argue that the Yellowstone bear population isn't that stable. In specific they stated: "The Yellowstone grizzly bear population is isolated from other populations of bears. They've also been experiencing high levels of conflicts this year with people," said Sylvia Fallon with the National Resources Defense Council. "And their population has not grown and is likely declining. That's following the loss of white bark pine, which is a critically important food source for them." "The conservation groups are urging the U.S. Fish and Wildlife Service to undertake more research instead of removing protection for the Yellowstone grizzlies.	Population parameters	USFWS, please listen to the environmental groups that oppose the proposal to take the Yellowstone Grizzlies off the Endangered Species List. Groups including the Sierra Club, Defenders of Wildlife, the Humane Society, the Center for Biological Diversity and the Natural Resource Defense Council all released statements saying the delisting was "premature". They argue that the Yellowstone bear population isn't that stable. In specific they stated: "The Yellowstone grizzly bear population is isolated from other populations of bears. They've also been experiencing high levels of conflicts this year with people," said Sylvia Fallon with the National Resources Defense Council. "And their population has not grown and is likely declining. That's following the loss of white bark pine, which is a critically important food source for them." The conservation groups are urging the U.S. Fish and Wildlife Service to undertake more research instead of removing protection for the Yellowstone grizzlies. USFWS, please follow their recommendation and refrain from delisting the Yellowstone Grizzlies.	FWS-R6-ES-2016-0042-3251
In 41 years, the grizzly population increased from 150 to 700 bears. That is 13 bears a year. Further, population growth has plateaued in recent years.	Population parameters	Please keep grizzly bears protected under the Endangered Species Act. In 41 years, the grizzly population increased from 150 to 700 bears. That is 13 bears a year. Further, population growth has plateaued in recent years. And now this population will be that could be wiped out by trophy hunters and ranchers now. 13 bears a year? And millions of taxpayer dollars? This, even when a majority of taxpayers - 55% - oppose delisting. Indeed, even more, 68% of Americans oppose hunting. Which begs the question, why will hunting be allowed just because the bears are delisted? When bald eagles were delisted, no hunting was permitted. It does not makes sense to ignore science and public opinion to allow hunting of a species that took decades and millions of dollars to recover (if they are indeed recovered). I therefore oppose delisting of grizzly bears from the Greater Yellowstone Ecosystem. Further, if the bears are delisted, I request that a moratorium on hunting be put in place for at least 5 years and that buffer zones around the parks be established.	FWS-R6-ES-2016-0042-3256
Quoted from David Mattson (who has spent 20 years studying the GYA grizzly) on Montana Public Radio, "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years.	Population parameters	Regarding Delisting the grizzly in the Greater Yellowstone Ecosystem - I am opposed to delisting the grizzly in the GYE. The population of grizzly in the GYE has not recovered enough to sustain itself once hunting is allowed, and particularly if trophy hunting is allowed. It's disgusting to me that FWS has spent 40 years recovering the population and wants to squander it away in a couple years - which is all it will take, if that. Quoted from David Mattson (who has spent 20 years studying the GYA grizzly) on Montana Public Radio, "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS is ignoring poll numbers that the Humane Society of US and Wyoming Wildlife Advocates showing that 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. And, more than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. In addition, 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. This is not the right time for delisting the grizzly. They stand little chance in the current climate to increase or actually even maintain their population should delisting occur.	FWS-R6-ES-2016-0042-3245
To say that a species is recovered at 674 individuals, occupying 2% or less of original range, is as insipid as saying the species should be restored to its original population of 50,000-100,000. Document Metadata as of: May 18, 2016 city: Boise comment due date: 05/10/2016 comment on doc id: FWS-R6-ES-2016-0042-0001 comment start date: 03/11/2016 commenton: FWS-R6-ES-2016-0042-0001 Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife commentsdue: May 10, 2016 country: United States date posted: 05/10/2016 docket id: FWS-R6-ES-2016-0042 docket: FWS-R6-ES-2016-0042 Endangered and Threatened Wildlife and Plants; Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears From the Federal List of Endangered and Threatened Wildlife document id: FWS-R6-ES-2016-0042-5430 document subtype: Comment(s) document type: PUBLIC SUBMISSIONS document: FWS-R6-ES-2016-0042-5430 Submitted Electronically via eRulemaking Portal first name: Pamela last name: Williams late comments: No name: Pamela Williams number of duplicate submissions: 1.0 original document id: FWS-R6-ES-2016-0042-DRAFT-5429 posted: May 10, 2016 posting restriction: No restrictions received date: 05/10/2016 received: May 10, 2016 rin: 1018-BA41 state or province: ID status set by: Bagbonnon, Michel (FWS) status set date: 05/10/2016 status: Posted status: Posted submission	Population parameters	To say that a species is recovered at 674 individuals, occupying 2% or less of original range, is as insipid as saying the species should be restored to its original population of 50,000-100,000. In terms of peer review of scientific data and interpretations, you fail to identify timetable, who the experts are, who chose them, and what criteria were used. Why? The Behavior and Life History section of the proposal states that large home ranges of males promotes genetic diversity, but this proposal subjects these bears to hunting pressures and to severe limitations on expansion of range -- thereby reducing genetic diversity. This section also states that the build up of fat stores is critical for survival during hibernation. You fail to address how bears, pursued by legions of trophy hunters and (very likely) packs of hounds, will be able to build up those essential fat stores. You state repeatedly in the proposal that the objective is to reduce or mitigate the risk of human-caused mortality. Idaho has lax regulations. Poaching fines have been stagnant since 1999, and a proposal to raise them died in committee this year. An April 26, 2016 letter from Idaho Rep. Simpson advises me of "expanding populations of gray wolves and grizzly bears" and what a fine job Idaho Wildlife Services does in conducting predator control. He also advises of the threats that beavers pose. Idaho is a wildlife-hostile state from the governor on down. Online comments from hunters on proposed hunting regulations (bear baiting, for example) taunt IDFG about their lack of enforcement and lack of personnel in the field and the hunters' pledges to continue doing whatever they like given the miniscule chance of getting caught. Your trust in Idaho's ability to "manage" grizzlies and run education campaigns is misplaced and ridiculous. Look at the relentless persecution of wolves -- including year-round trapping on private lands. You say in this proposal that you do not anticipate states establishing trapping seasons for grizzlies, but the newest Commission member vows to expand trapping opportunities in Idaho. IDFG has not released its grizzly management plan yet, according to an IDFG staffer's statement to me yesterday, but it should be available in "the next few weeks." Why ask the public to comment before the state plans are available? One of the reasons cited for delisting wolves and allowing hunting and trapping was to build tolerance in local communities. It did the opposite in Idaho and simply fueled a rage and resentment towards the species that is still growing. Delisting is extremely bad news for Idaho bears. Let me point out that hunting does not contribute to "secure habitat," which you say is a critical management component to ensure species persistence. Your suggestion that there are "reasonable and manageable levels" of grizzly mortality is offensive and insulting. Recreational killers and outfitters are a small percentage of the American population. Do not assume that the majority supports the goal to have enough animals for recreational killing. You might have learned something from the Cecil the lion debacle. Most of us oppose trophy hunting and recreational killing. I vehemently disagree that any human-caused mortality of cubs and their mother is acceptable. Zero is acceptable. You fail to demonstrate how you will prevent hunters from killing mother bears & their young. I am outraged by your allowable mortality percentages for males, females, and cubs. I get the impression that this proposal was written for the sole benefit of recreational killers. This proposal states that bears cannot resist sheep, and yet sheep allotments are retired only with willing permittees. You fail to adequately mitigate threats posed by livestock producers. Somewhere you claimed to use plain language. Stop saying things like "discretionary mortality" and "regulated harvest." Say "killing for trophy or fun." In terms of food sources, they are inadequate without putting bears at risk. Climate change, fire, and drought may cause bears to roam further, putting them in the bullseye of the hunter, rancher, orchard owner. You also fail to address pesticide effects on cutthroat moths. You fail to address how mountain biking -- increasingly popular -- could provide a threat due to frequent disturbance and to increased human encounters. Further, I disagree with your conclusion that increasing numbers of "dispersed sites" and primitive road access do not pose a threat. They clearly pose a threat of disturbance and increased human encounters. Your dismissal of snowmobiles as a threat simply because no studies have been done is puzzling. Why not take a "least harm" approach instead? In terms of annual reports of kills, I want to know age, gender, and method of kill in addition to the other data you plan to capture. Were there any bear advocates involved in writing this proposal? No? I didn't think so.	FWS-R6-ES-2016-0042-5430

GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, it is particularly vulnerable to excessive killing by humans. Last year, saw 59 grizzlies killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow reproducing species.	Population parameters	DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears. - GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, it is particularly vulnerable to excessive killing by humans. Last year, saw 59 grizzlies killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow reproducing species. - NEARLY 50 TRIBES OPPOSE DELISTING OF GRIZZLIES. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly oppose delisting and hunting of these bears, which they consider to be sacred animals. - EXPERTS OPPOSE REMOVING GRIZZLIES FROM THE ENDANGERED SPECIES LIST. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted. Based on what I've learned, the PEOPLE don't want this...so why are you working against the same people who put you in office. People who keep you employed. If the American population doesn't want this and experts are saying we shouldn't do it, then why are you? That's the question you need to ask yourself. Are you being fueled by money, unethical money, lack of morals? I think you need to get your ego checked. Stop thinking mankind if above animals because we are not. All Lives Matter. Anything that breaths feels and knows what is happening. Plus bears are very docile - they don't attack people, so why are YOU scared of them? What are YOU scared of that makes you want to delist them?	FWS-R6-ES-2016-0042-3247
1. Grizzlies reproduce at one of the slowest pace of any large mammal in the US, so any loss of adult females would significantly adversely affect their overall population.	Population parameters	The IGBC has worked tirelessly for the recovery of grizzlies for many years and their population has increased a modest amount since 1975 when they were initially listed and I commend their efforts. I ask the question, what is the purpose and need to delist the GYE grizzly. I worked for the BLM my entire career and I know the pressure to delist species so management activities can go forward. I know the states have put pressure to allow their agencies to take over management, but let's let science decide and leave the politics to the politicians. Here is the need to continue the protection of GYE grizzly bears: 1. Grizzlies reproduce at one of the slowest pace of any large mammal in the US, so any loss of adult females would significantly adversely affect their overall population. 2. Even though grizzlies eat a wide variety of foods, the majority rely on whitebark pine seeds while others rely on Yellowstone cutthroat trout which have both significantly declined in recent years. These losses result in grizzlies looking for alternate high protein and fat food sources which may be one of the reasons why human caused grizzly deaths are on the increase. 3. Visitors to Yellowstone and Grand Teton National Parks provide hundreds of millions of dollars to the local economy and one of the main reasons for their visitation is to see live grizzly bears. I realize the ESAs purpose is not to provide economic stimulus, however, there is little doubt if grizzly bear ranges are allowed, less opportunity for bear observations will occur. 4. By continuing the protection, the grizzly gene pool will be maintained or improved. Furthermore, as they continue to expand their home ranges, their natural migration into the Bitterroot Mountains and Northern Continental Divide would be enhanced, instead of the continual isolation of the GYE. 5. Conflicts between grizzlies and humans are mainly due to livestock predation and hunter encounters. Their continued protection would put the onus on us, requiring us to learn how to live with them instead of them bearing our faults. There are ranchers living among grizzlies that have had few or no conflicts with bears for years because they have learned how to alter their practices. We know how to reduce human/grizzly conflicts, but if delisted, the indiscriminate killing [eventual hunting] would do little to reduce these conflicts. Grizzlies have two main needs, to eat and breed. Their main food sources before winter fat up are significantly declining and any loss of adult bears and especially breeding females would adversely affect their population and continued recovery. One of the greatest moments of my life occurred while hiking in Glacier NP and had a close encounter with a grizzly. Their presence on the wild landscape is an indicator of a fully functioning ecosystem and until they disperse to other recovery zones, there is no need to delist them.	FWS-R6-ES-2016-0042-3293
Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources.	Population Parameters	"Critics of the USFWS proposal say that lifting protections for the bear could endanger a growing population. The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to an estimated 700 or more today. But grizzly bears have all but disappeared from almost all of the continental United States, except for Yellowstone and Glacier National Park and a few other slivers of habitat, the New York Times reported May 3. "Critics also say that delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that FoA and local tribes, oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. "We cannot let human behavior and stupidity jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. "Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. "With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. "Even the author of the report that led to the delisting proposal, Dr. Christopher Servheen, grizzly bear recovery coordinator, U.S. Fish and Wildlife Service, admits private land development is the greatest threat to the nation's grizzlies, as further development could cut off connectivity among populations and disrupt vital habitat."	FWS-R6-ES-2016-0042-3328
I think the Grizzly count should be between 850-1000 bears before you can even consider putting them on the hunting list.	Population parameters	I think the Grizzly count should be between 850-1000 bears before you can even consider putting them on the hunting list. So feel free to take them off the endangered and threatened wildlife list, but specify that this doesn't mean they can start being shot.	FWS-R6-ES-2016-0042-3395
Please do not delist the Grizzly Bears and hand over their lives to states which management which manages by hunting. The population has grown less than 19 bears a year: Do the math. A population of 150 bears were put under the ESA 41 years ago and we only have 750 bears which are already subject to being put down for cattle deaths and humans interactions. That is less than 20 bears a year. So many more will be killed if they are delisted.	Population parameters	Please do not delist the Grizzly Bears and hand over their lives to states which management which manages by hunting. The population has grown less than 19 bears a year: Do the math. A population of 150 bears were put under the ESA 41 years ago and we only have 750 bears which are already subject to being put down for cattle deaths and humans interactions. That is less than 20 bears a year. So many more will be killed if they are delisted. I say again: Do the math, apply the science. Keep Grizzly Bears listed.	FWS-R6-ES-2016-0042-3415
Critics of the USFWS proposal say that lifting protections for the bear could endanger a growing population, and a lot of the US Public believe that also. A The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to an estimated 700 or more today. But grizzly bears have all but disappeared from almost all of the continental United States, except for Yellowstone and Glacier National Park and a few other slivers of habitat, the New York Times reported May 3.	Population parameters	We must immediately stop the U.S. Fish and Wildlife Service (USFWS) from removing the grizzly bear in the Greater Yellowstone Ecosystem Montana, Idaho and Wyoming from the Federal Lists of Endangered and Threatened Wildlife. They must not delist the Yellowstone grizzly bear... Critics of the USFWS proposal say that lifting protections for the bear could endanger a growing population, and a lot of the US Public believe that also. The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to an estimated 700 or more today. But grizzly bears have all but disappeared from almost all of the continental United States, except for Yellowstone and Glacier National Park and a few other slivers of habitat, the New York Times reported May 3. After all I have read I wonder if the delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that I sternly oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. We cannot let humans jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. I also read that the author of the report that led to the delisting proposal, Dr. Christopher Servheen, grizzly bear recovery coordinator, U.S. Fish and Wildlife Service, admits private land development is the greatest threat to the nation's grizzlies, as further development could cut off connectivity among populations and disrupt vital habitat. Please do what is right and scientifically backed and don't delist the grizzly bear because it would be the beginning of the end for them. Thank you for your time and consideration on this very important issue.	FWS-R6-ES-2016-0042-3441
Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. A	Population parameters	We must immediately stop the U.S. Fish and Wildlife Service (USFWS) from removing the grizzly bear in the Greater Yellowstone Ecosystem Montana, Idaho and Wyoming from the Federal Lists of Endangered and Threatened Wildlife. They must not delist the Yellowstone grizzly bear... Critics of the USFWS proposal say that lifting protections for the bear could endanger a growing population, and a lot of the US Public believe that also. The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to an estimated 700 or more today. But grizzly bears have all but disappeared from almost all of the continental United States, except for Yellowstone and Glacier National Park and a few other slivers of habitat, the New York Times reported May 3. After all I have read I wonder if the delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that I sternly oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. We cannot let humans jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. I also read that the author of the report that led to the delisting proposal, Dr. Christopher Servheen, grizzly bear recovery coordinator, U.S. Fish and Wildlife Service, admits private land development is the greatest threat to the nation's grizzlies, as further development could cut off connectivity among populations and disrupt vital habitat. Please do what is right and scientifically backed and don't delist the grizzly bear because it would be the beginning of the end for them. Thank you for your time and consideration on this very important issue.	FWS-R6-ES-2016-0042-3441

It has taken a very long 40 years for their numbers to get to where they are today. It is a proven fact that they do not reproduce fast the cubs stay with their mothers for a long time.	Population parameters	I am asking that you do not remove the Greater Yellowstone Grizzly bears from the endangered list. It has taken a very long 40 years for their numbers to get to where they are today. It is a proven fact that they do not reproduce fast the cubs stay with their mothers for a long time. They need that time to learn and grow. I am tired of hunters seeing them as trophies and ranchers seeing them as vermin. If a rancher wants to live in Bear country then they have to learn to deal with them. We have cut down huge areas for development, taken away their food sources and that is why they take the odd cow, they need to eat as well. We can all coexist with wildlife if we choose to. There needs to be better management of habitat. We need to stop handing out permits for hunting, we need to stop setting up ranches in their territory, and we seriously need to get rid of the corruption in offices that are supposed to protect wildlife. Please for the sake of nature, do not delist the bears or the wolves for that matter. We can not afford to lose these magnificent bears because once they are gone.....there is no bringing them back Change the laws to protect them, stop letting hunters & ranchers dictate how wildlife should be protected for they are just out for themselves not for conservation of the protection of the species.	FWS-R6-ES-2016-0042-3425
With low reproduction rates, female bears are critically important in maintaining the population.	Population Parameters	I am opposed to delisting grizzly bears in the Yellowstone Grand Teton Ecosystem (YGTE) at this time and providing my comments below as well as questions regarding the delisting proposal. There is no compelling reason for delisting and reducing the number of grizzly bears when the relatively small isolated and genetically impaired population in the YGTE is dependent on many rapidly changing variables. The trend is not favorable for a healthy grizzly population with the adverse impacts of shrinking habitat due to human encroachment and the annual toll of human caused deaths. In addition it is difficult to deny the adverse impacts climate change and other causes is having on critical food sources. There is little consensus on the actual population of grizzlies in the YGTE, but what is known is that only about 25% of the population is composed of breeding females, perhaps as few as 150. With low reproduction rates, female bears are critically important in maintaining the population. How can anyone predict a robust future for a recovering species when there are so many variables and so many unknowns? How will delisting followed by hunting as Wyoming is planning, improve the long term survival of this iconic animal? How will killing members of a recovering species improve the genetics and predictability of the population dynamics? Clearly delisting means hunting as the plans are already in motion in Wyoming. And just as clearly, with the popularity of female bear number 399 and her importance to the tourism industry, she will be high on the list for trophy hunters. Several guides and individuals who want a bear skin rug and her stuffed head gathering dust in their den have made it clear that she is a prime target. Why put her life at risk when she has a huge fan base around the world? Since 399's habits are well documented, her den site is known, she is accustomed to seeing humans watching her, and she has a tracking collar - she is a dead duck. The USFWS knows that as well as everyone else. Without question she will be one of the first to go. There are other bears whose habits are well known. They are not causing problems but they along with 399 will be killed. Killing of these bears cannot be classified as hunting as there is no hunting required, it is just killing without any purpose other than to deprive others of seeing beautiful bears like 399 in the wild. And what happens if she or other bears are wounded in the killing free for all? Not one person will go hungry if these bears are not killed, however the world will be a much poorer place. This is a tragedy that does not have to happen. It is well known that the YGTE is an island with little connectivity to the rest of North America. The result is a genetic bottleneck and a current and long term threat to the health of the grizzly population. How will allowing the random killing of grizzlies with no concern for the lost genetics or even the sex of the bears, improve the gene pool in the YGTE? How will creating a mote around the YGTE by hunting at the boundaries improve the much needed genetic connectivity with bears outside the YGTE? Ensuring bears remain isolated will only further impair much needed connectivity. If America is to have a healthy and genetically robust grizzly population the grizzly must be protected in all areas designated as suitable grizzly bear habitat within and surrounding the YGTE, the Upper Green River Valley and the Wind River range. These are areas that are very important in ensuring critical long term population and distribution objectives are achieved. The Upper Green River area is an important habitat linking the bear populations to the Gros Ventre and Hoback regions as well as the Wind River Range. The Wind River Range has some of the last remaining stands of whitebark pine that provide a critical source of food in the bear's diet. However it is increasingly rare for a bear to make it through the Green River corridor to the Wind River Range and hunting will likely eliminate that potential completely. If we are to support grizzlies in the YGTE, migration corridors like the Upper Green River must be managed by establishing rules regarding livestock use of these public lands. Tourism is a key component of the economies of WY, ID and MT as travelers from throughout the world come to the YGTE to see wildlife including bears like 399. It doesn't make sense economically, scientifically, genetically or otherwise to start destroying these bears, especially when they are still recovering from past extermination attempts and near extinction. A decision to delist the recovering population of grizzlies in the YGTE is a decision to kill these magnificent animals leaving orphaned cubs and significantly reducing the opportunities for visitors to our parks to see grizzlies in the wild. The loss of 399 and other popular bears will not be taken lightly or forgotten soon and the USFWS will be held responsible.	FWS-R6-ES-2016-0042-3473
Genetic viability The Greater Yellowstone grizzly population is independent from all other grizzly populations & increased inbreeding will likely negatively impact on genetic viability. The Rule is based on flawed research which assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in an unviable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly population is seriously flawed & not in keeping with the requisite principle of rigorous evidence-based decisions.	Population parameters	Please see below Attachments 160507 Grizzly bears	FWS-R6-ES-2016-0042-3400
**The size and distribution of the current population of grizzly bears does not ensure long-term viability--science indicates that a population of several thousand, AS WELL AS connecting grizzly ecosystems [e.g. to source populations in Canada] is required to achieve this goal.	Population parameters	I STRONGLY OPPOSE YELLOWSTONE GRIZZLY BEAR DELISTING. **The size and distribution of the current population of grizzly bears does not ensure long-term viability--science indicates that a population of several thousand, AS WELL AS connecting grizzly ecosystems [e.g. to source populations in Canada] is required to achieve this goal. NOTE THAT THE LOSS OF ONLY A FEW FEMALE BEARS EACH YEAR CAN MEAN THE DIFFERENCE BETWEEN A STABLE OR DECLINING POPULATION. Studies show that it typically takes a female grizzly TEN (10) years to have a female cub that survives to give birth. **The degree and pace of habitat change occurring in the region MUST BE [AND IS NOT YET] INCORPORATED--human population is rapidly expanding; whitebark pine [a very important food source for grizzlies] is disappearing at an alarming rate due to mountain pine beetle infestation, blister rust and other diseases, and the effect of global warming in this ecosystem. THEREFORE, the Agency must protect unoccupied habitat outside of the recovery zone, including areas where bears have been prohibited. **Delisting necessitates habitat management plans WHICH DO NOT AS YET EXIST. Positive results can only be achieved if states fulfill their commitment to species recovery [when grizzlies are finally declared recovered and states assume primary responsibility for management of the species]. Certainly, WOLF RECOVERY MANAGEMENT in WY following delisting in the Northern Rockies in 2011, DOES NOT BODE WELL for the grizzlies: WY classified wolves as PREDATORS, permitting anyone to kill them, by any means, any DAY OF THE YEAR, for any reason, across 85 percent of the State. **The delisting plan CONTAINS NO HABITAT PROTECTIONS FOR ABOUT 1/3 OF OCCUPIED GRIZZLY HABITAT. To sustain current population numbers, habitat conditions must also be maintained. The current PLAN ONLY PROTECTS LANDS WITHIN THE SIX MILLION ACRE RECOVERY ZONE, AND LEAVES OUT OVER TWO MILLION HABITAT ACRES, all of which except 15% protected as Wilderness IS OPEN TO DEVELOPMENT. ONE FINAL POINT [though not SCIENTIFIC, it is based on reliable data from numerous studies]: **More and more nature-loving Americans BELIEVE THAT SPECIES LIKE GRIZZLIES and wolves should be part of the landscape. Unlike in the "frontier days," when predators were ONLY VIEWED as liabilities, there is growing sentiment that uncommon species like grizzlies are WORTH MORE ALIVE THAN DEAD. A large part of the Greater Yellowstone Ecosystem's \$1 BILLION tourism industry is based on wildlife viewing.	FWS-R6-ES-2016-0042-3509
NOTE THAT THE LOSS OF ONLY A FEW FEMALE BEARS EACH YEAR CAN MEAN THE DIFFERENCE BETWEEN A STABLE OR DECLINING POPULATION. Studies show that it typically takes a female grizzly TEN (10) years to have a female cub that survives to give birth.	Population parameters	I STRONGLY OPPOSE YELLOWSTONE GRIZZLY BEAR DELISTING. **The size and distribution of the current population of grizzly bears does not ensure long-term viability--science indicates that a population of several thousand, AS WELL AS connecting grizzly ecosystems [e.g. to source populations in Canada] is required to achieve this goal. NOTE THAT THE LOSS OF ONLY A FEW FEMALE BEARS EACH YEAR CAN MEAN THE DIFFERENCE BETWEEN A STABLE OR DECLINING POPULATION. Studies show that it typically takes a female grizzly TEN (10) years to have a female cub that survives to give birth. **The degree and pace of habitat change occurring in the region MUST BE [AND IS NOT YET] INCORPORATED--human population is rapidly expanding; whitebark pine [a very important food source for grizzlies] is disappearing at an alarming rate due to mountain pine beetle infestation, blister rust and other diseases, and the effect of global warming in this ecosystem. THEREFORE, the Agency must protect unoccupied habitat outside of the recovery zone, including areas where bears have been prohibited. **Delisting necessitates habitat management plans WHICH DO NOT AS YET EXIST. Positive results can only be achieved if states fulfill their commitment to species recovery [when grizzlies are finally declared recovered and states assume primary responsibility for management of the species]. Certainly, WOLF RECOVERY MANAGEMENT in WY following delisting in the Northern Rockies in 2011, DOES NOT BODE WELL for the grizzlies: WY classified wolves as PREDATORS, permitting anyone to kill them, by any means, any DAY OF THE YEAR, for any reason, across 85 percent of the State. **The delisting plan CONTAINS NO HABITAT PROTECTIONS FOR ABOUT 1/3 OF OCCUPIED GRIZZLY HABITAT. To sustain current population numbers, habitat conditions must also be maintained. The current PLAN ONLY PROTECTS LANDS WITHIN THE SIX MILLION ACRE RECOVERY ZONE, AND LEAVES OUT OVER TWO MILLION HABITAT ACRES, all of which except 15% protected as Wilderness IS OPEN TO DEVELOPMENT. ONE FINAL POINT [though not SCIENTIFIC, it is based on reliable data from numerous studies]: **More and more nature-loving Americans BELIEVE THAT SPECIES LIKE GRIZZLIES and wolves should be part of the landscape. Unlike in the "frontier days," when predators were ONLY VIEWED as liabilities, there is growing sentiment that uncommon species like grizzlies are WORTH MORE ALIVE THAN DEAD. A large part of the Greater Yellowstone Ecosystem's \$1 BILLION tourism industry is based on wildlife viewing.	FWS-R6-ES-2016-0042-3509
There is no scientific reason to hunt Grizzly Bears, they are slow to reproduce and need protection, not targets on their back for the benefit of the constantly declining special interests of trophy hunters.	Population parameters	I am opposed to delisting the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal list of endangered species. The decision is premature and does not adequately factor in the decline of their main food sources due to climate change. There is no scientific reason to hunt Grizzly Bears, they are slow to reproduce and need protection, not targets on their back for the benefit of the constantly declining special interests of trophy hunters. Listen to the voices of scientists who have appealed to your poor and biased decision to remove the bears from esa protection. Listen to the comments from the public which are overwhelmingly against delisting Grizzlies. Stop listening to the diminished and shrieking voices of the minority who find pleasure in killing public wildlife for their own sick personal benefit.	FWS-R6-ES-2016-0042-3525

Population Estimates While as accurate population estimate is difficult in a large, rugged area like the Greater Yellowstone Ecosystem, it is essential for any post-delisting decisions regarding sport hunting of grizzlies. The methods used by the IGBST to estimate bear population numbers are highly questionable as can be seen in peer-review, scientific literature. In the interests of true science on which to base appropriate decisions, all data regarding grizzly numbers needs to be transparent & available for independent scientific analysis & review.	Population parameters	Please see below Attachments 160507 Grizzly bears	FWS-R6-ES-2016-0042-3400
The ESA process has succeeded in saving the grizzly bear from complete extirpation, but recovery takes time. Of the 50,000 grizzlies that roamed the lower 48 two centuries ago, only about 3% are left, and over half of those bears reside in the GYE - the area in and around Yellowstone and Grand Teton National Parks. Suggesting that a population which has struggled to increase its numbers by even a few hundred over the past 40 years is recovered is not logical.	Population parameters	I live in rural New Mexico. I used to live in rural Idaho, Boise, Seattle, and Spokane. I watched the Mahleir Wildlife Refuge confrontation in Oregon, and was aghast Cliven Bundy de facto expropriated public land by threatening federal agents executing a court order. I have been menaced by people with livestock when lawfully accessing wilderness areas. I am aware of the political pressure imposed on the FWS by special interests who think public lands belong to them or should be open to plunder. This has led to wildlife managers in the states surrounding GYE states who make decisions based on politics instead of science. The New Mexico Department of Game and Fish recently changed a rule to allow steel leg-hold traps against cougars on public land despite overwhelming public opposition and weak conjectural evidence. This is what happened with the delisting of the grey wolf enabling a calamitous and, frankly, nauseating slaughter of these creatures. FWS is proposing to repeat this spectacle by delisting the Grizzly. The ESA process has succeeded in saving the grizzly bear from complete extirpation, but recovery takes time. Of the 50,000 grizzlies that roamed the lower 48 two centuries ago, only about 3% are left, and over half of those bears reside in the GYE - the area in and around Yellowstone and Grand Teton National Parks. Suggesting that a population which has struggled to increase its numbers by even a few hundred over the past 40 years is recovered is not logical. It is certain that removing federal protections from the GYE grizzly bear would result in a rush to hunt these bears down. A leaked memo detailing how these three states would divvy up the grizzlies to trophy hunters confirmed this. Opening a hunting season on these bears would not only lower their numbers, it would lower their chances of ever actually recovering. Climate change, the loss of important food sources, low reproductive rates, and existing human-caused mortality all threaten the survival of this population. Removing healthy individuals from the gene pool and orphaning dependent cubs, compounded with the stress on surviving bears caused by the need to constantly run for their lives, will have untold consequences. I am sick and tired of land, water, air, timber, and wildlife that is the heritage of all Americans managed as though it belongs to a privileged few. I know millions of Americans share my view. I hope FWS takes the scientifically correct and morally defensible position of continuing to protect what is left of this species. James Atkinson, PhD	FWS-R6-ES-2016-0042-3548
The current population of Grizzlies is not recovered by any means. Follow the science man!	Population parameters	National Parks belong to everyone, just as the grizzly bears belong to everyone within those parks, not to someone who pays to kill it. I want to be able to enjoy the bears. Ask someone how many were killed this past year without a hunting season. It's pretty sickening, and that doesn't include, the shoot, shovel and shut up bear deaths either. Economically, the live, protected grizzly bears bring in many more dollars, (tourists,) than the grizzly hunting season will ever bring. The current population of Grizzlies is not recovered by any means. Follow the science man! Why is this even being considered? Look what happened to the wolves a few years ago, doesn't that show you people anything? A bear or a wolf doesn't know where a National Park property line is. For Pete sakes people wake up!	FWS-R6-ES-2016-0042-3617
Their survival is by no means that significantly improved as there are ONLY 700! That's less than the tiger, who is considered "Endangered" in the world.	Population parameters	Please don't do this again! We've de-listed the Wolves, the Buffalo, now this - all for a quick buck for tags and hunters coming in. Do you realize there is more money to be MADE by tourists wishing to see these "American" animals? What with climate change creating food source challenges, these animals are NOT ready to be taken off the Endangered Species list whatsoever. Two of their four major foods have all but been wiped out due to climate change, disease and invasive species. And they may be killed if they prey on livestock in their increasingly difficult search for food. Their survival is by no means that significantly improved as there are ONLY 700! That's less than the tiger, who is considered "Endangered" in the world. Please, these Grizzlies as well as the Wolves and Buffalo are National Treasures species not found ANYWHERE else but in the United States. Is there ANYTHING sacred and safe about our heritage that is NOT for SALE? Grizzlies are important to the eco balance of our wilderness area's and must be protected. Their numbers will diminish quickly, and assuredly if you let the hunters move in. Fires in Canada should show you plainly how delicate our situation is with respect to wildlife survival. Please, make our heritage not for sale. I want to see these animals alive not in a virtual reality, zoo, or an old movie. Their contribution our world is too important. Thank you!	FWS-R6-ES-2016-0042-3651
low population diversity, a less than suitable bear habitat in GYE, continued habitat degradation and human encroachment, all the effects of climate change, reduced and in some cases the lack of preferred bear food sources (white bark pine nuts, cut throat trout) in GYE, the ecological importance of an apex predator in maintaining the health of the GYE ecosystems, and the spontaneous culling by "threatened" humans.	Population parameters	While an understanding of the scientific justification* against de-listing of the grizzlies in Yellowstone should be enough, there is a possibly even greater argument for ensuring security for the grizzly: The continued existence of one of the world's most magnificent top predators that have roamed most of North America for eons, respected by Native Americans, feared by early explorers like Lewis and Clark, and held in awe by most of us. Is it too much to ask of us as Americans and also stewards of the land we have so grossly denigrated, to want to maintain a tiny corner of the country for one of the greatest symbols of wildness left on this earth? Our care and ability to secure a safe future existence for this grand, beautiful mammal, despite all odds against it, will leave a legacy that will speak volumes to future generations of Americans about who we were. * low population diversity, a less than suitable bear habitat in GYE, continued habitat degradation and human encroachment, all the effects of climate change, reduced and in some cases the lack of preferred bear food sources (white bark pine nuts, cut throat trout) in GYE, the ecological importance of an apex predator in maintaining the health of the GYE ecosystems, and the spontaneous culling by "threatened" humans.	FWS-R6-ES-2016-0042-3725
The growing robust grizzly population is a good thing, and the USFWS should be commended for taking the steps that have allowed this to happen. With this growth comes the inevitable increase of human/grizzly encounters. With more people than ever visiting the Yellowstone area and more bears, this is a predictable situation. However much of the responsibility for these encounters has to be placed on humans. We are visiting the bears habitat, and need to learn to respect that. If humans go out and do stupid things like approach bison or enter bear habitat areas without taking the necessary precautions, it should not be the animals who are blamed and hunted.	Population Parameters	I am asking you to reconsider your proposal about removing the Greater Yellowstone Area (GYA) population of grizzly bears from the List of Endangered and Threatened Wildlife. Even though the GYA bear population as grown to an estimated 700 animals, with some estimates giving higher number, I believe this number may not be high enough to consider reducing the population through hunting. Currently the whitebark pine in the GYA area which is a main food source for the bears has been greatly reduced due to the mountain pine beetle. With the effects of climate change, further food sources and habitat areas for the grizzlies may be diminished in the future. Genetic diversity in the GYA grizzly population may also be significantly affected if the population is allowed to be reduced to 500 animals. A FWS talking points paper on this issue states that if the population falls below 500, the Montana FWP would transplant bears from other areas to maintain genetic diversity. Why not let the GYA grizzly population grow to a point where the genetic diversity is robust enough, then reconsider the delisting options. One study states that it may take a population of 1850 animals to maintain adequate genetic diversity. Please understand that I am not opposed to hunting, and have hunted big game wildlife in the past. However I see no practical need to hunt grizzly bears. This is trophy hunting only, nothing more, nothing less. Even though the USFWS has approved management plans from the states of Montana, Wyoming, and Idaho, what assurances are there that any or all of these states won't make changes to these plans that would have considerable negative impacts on the grizzly population. There is also no need for depredation hunts, as to my knowledge there is no significant grizzly activity that is causing widespread damage to human or domestic livestock. The growing robust grizzly population is a good thing, and the USFWS should be commended for taking the steps that have allowed this to happen. With this growth comes the inevitable increase of human/grizzly encounters. With more people than ever visiting the Yellowstone area and more bears, this is a predictable situation. However much of the responsibility for these encounters has to be placed on humans. We are visiting the bears habitat, and need to learn to respect that. If humans go out and do stupid things like approach bison or enter bear habitat areas without taking the necessary precautions, it should not be the animals who are blamed and hunted. Finally, it is ironic to me that on the USFWS home web page the winning poster for the 2016 Saving Endangered Species Youth Art Contest. It's hard to miss the grizzly right in the middle of the poster. It would be a shame if the GYA grizzly population is placed right back on the Threatened and Endangered Wildlife List again in the near future because a delisting decision was made to soon. Please reconsider this proposal and leave the GYA grizzly population on the List of Threatened and Endangered Wildlife for the time being.	FWS-R6-ES-2016-0042-3599
Grizzlies are one of the slowest reproducing mammals in North America, under optimal conditions giving birth only every three years. If delisted the efforts of FWS for the last 40 years to rebuild the grizzly population would be very quickly wiped out by sport hunting.	Population parameters	I oppose delisting of Greater Yellowstone Ecosystem grizzlies. It has taken 40 years for the grizzly population to recover to where it is today. Grizzlies are one of the slowest reproducing mammals in North America, under optimal conditions giving birth only every three years. If delisted the efforts of FWS for the last 40 years to rebuild the grizzly population would be very quickly wiped out by sport hunting. The fate of these animals should not be turned over to individual states who appear to be more concerned with opening the areas to trophy hunting rather than to maintaining a stable bear population. I support the statement of the Greater Yellowstone Coalition that the Yellowstone grizzly population should be managed as an ecosystem population, not as separate Wyoming, Idaho and Montana populations. Grizzly management needs to continue through cooperation and coordination between the U.S. Forest Service, National Park Service, Native American tribes, the Interagency Grizzly Bear Study Team and the states involved, with public input.	FWS-R6-ES-2016-0042-3850
There are a multitude of reasons including the fact that the Grizzly Bears are down to 1% of their historic range and are one of the slowest reproducing land mammals. Killing small numbers of females could have catastrophic effects on the population and it may prove extremely difficult to recover.	Population parameters	Please do not remove Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. There are a multitude of reasons including the fact that the Grizzly Bears are down to 1% of their historic range and are one of the slowest reproducing land mammals. Killing small numbers of females could have catastrophic effects on the population and it may prove extremely difficult to recover. We are obligated to take care of this planet and it's creatures. Please do the right thing and leave the Grizzly Bears under federal protection.	FWS-R6-ES-2016-0042-3856

3. Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase numbers in the ecosystem (ref. Fig. 1 p 13180, of The Rule). Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. Do the math: mortality levels of recent years is not sustainable.	Population Parameters	I wish to comment on the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I wish to strongly oppose such a removal for the following reasons: 1.Climate Change Impacts Climate change is a real, scientific and provable issue and the park and its inhabitants have already been affected. To dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." with no proper scientific evidence is laughable.The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule, which is highly questionable. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population. This leads into my second point. 2. Declining food resources There is no evidence in The Rule for true accounting on this point. Historically, there have been four critical foods for grizzlies in Yellowstone: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are "generalists with a broad range in diet", but what really is important for maintaining the population is availability of high quality food at the right time of the year within an INTACT ECOSYSTEM. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. These four points have not been taken into consideration. This is unscientific. 3. Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase numbers in the ecosystem (ref. Fig. 1 p 13180, of The Rule). Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. Do the math: mortality levels of recent years is not sustainable. 4. Population Estimates A remote and rugged area such as the Greater Yellowstone ecosystem posed problems for accurate measurement. Accuracy- real accuracy- is necessary for making such a huge decision about delisting.The current methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by any subsequent IGBST rebuttal and so I would think it fair and in the interests of rigorous science for all data regarding grizzly numbers to be made available for truly independent scientific analysis and review. 5. Genetic Viability To have a healthy Grizzly population now and into the future, genetic diversity is imperative. The Greater Yellowstone Grizzly bear population is an island so to speak. It is apart from all other grizzly populations. This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. This is not good science- nor are you protecting the genetic stock for the future should you narrow the gene pool. And finally, the gateway communities around Yellowstone National Park recieve and estimated benefit of \$US500 Million, and tourism is an important ongoing factor to jobs in the area. Tourists come for the large apex predators such as bears and wolves and to reduce the opportunity of viewing a large mammal such as a Grizzly is foolhearty. As an annual international visitor and a writer who often promotes the park to literally hundreds of thousands of potential tourists each year,I cannot understand why government would even be thinking of delisting just on this basis alone. Thank you for your consideration. Stacey Demarco, Natureluster Global.	FWS-R6-ES-2016-0042-3805
Although their population has increased they are still susceptible to the threats of habitat loss, climate change, and issues with reproduction based on a small population. We need to do everything we can to protect the wild lands that remain in north america, and by helping the species that live there thrive, we keep these parts as they should be - wild and untouched by humans.	Population parameters	Please do not delist the grizzlies from the Federal Endangered Species Act protection. Although their population has increased they are still susceptible to the threats of habitat loss, climate change, and issues with reproduction based on a small population. We need to do everything we can to protect the wild lands that remain in north america, and by helping the species that live there thrive, we keep these parts as they should be - wild and untouched by humans.	FWS-R6-ES-2016-0042-3863
Just because the population has increased over the past few years does not mean it will remain that high once the ban is lifted.	Population parameters	Trophy hunting is wasteful and immoral on every level possible to be understood by any person with decent character and a respect for life. Unfortunately, there are people who do not respect other life forms aside from human (if that), and get a thrill from killing animals such as bears, lions, hippos, giraffes, etc. Wow! Hunting! wtg. @ me for explaining something that everyone reading this comment already very well knew!!! It sounds redundant, doesn't it? Well guess what? IT IS. IT IS 2016, WHY ARE WE STILL HAVING TO TRY TO CONVINCE PEOPLE NOT TO KILL ANIMALS FOR FUN?!?!?! No, I am not vegan or vegetarian, I just don't believe in hunting as a sport UNLESS you are using EVERY part of the animal. And using it for good cause, not luxury. If you're going to kill a bear, properly use its meat to feed those who can't afford to feed their families. Use its skin to warm those who do not have an adequate amount of blankets to use in the winter. Don't kill animals to make a fur coat for some rich person to wear to feel fancy. Don't kill an animal to make a rug. Don't kill an animal to mount its head on your wall. Kill animals not commonly eaten when it is NECESSARY, not when you are bored. Jeez, why do some people need to be told that?? And even if someone is repeatedly told not to do something, if they are stubborn, they will find a way. So at least make sure those people who cannot follow very simple rules are appropriately punished by keeping the grizzly bear on the Federal List of Endangered and Threatened Wildlife. Just because the population has increased over the past few years does not mean it will remain that high once the ban is lifted. It is common sense. Do what is right for the animals. Do what is right for the earth. Be a respectable human being and do not kill animals for sport. Just don't do it.	FWS-R6-ES-2016-0042-3865
The proposed rule does not address the genetic isolation of the bears, the issues that are caused by declining food sources, and the fact that grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. This problem is exacerbated by the poaching of bears that occurs even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. This will lead them into most populated areas and make them more vulnerable to being killed. Therefore it is necessary for them to remain protected and allowed to exist in an area that keeps them safe and does not encourage them to seek food and shelter elsewhere.	Population parameters	The proposed rule does not address the genetic isolation of the bears, the issues that are caused by declining food sources, and the fact that grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. This problem is exacerbated by the poaching of bears that occurs even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. This will lead them into most populated areas and make them more vulnerable to being killed. Therefore it is necessary for them to remain protected and allowed to exist in an area that keeps them safe and does not encourage them to seek food and shelter elsewhere.	FWS-R6-ES-2016-0042-3889

Recently the USFWS commented that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. However, no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration."	Population parameters	Please see attached comment. Attachments Letter to the FWS on De-lisiting the Grizzly	FWS-R6-ES-2016-0042-3929
Their population is not even fully recovered, they are struggling with loss of food due to climate change. They reproduce so slowly this will devastate their not yet fully recovered population. The ESA was not designed to have animals taken off and immediately hunted! Trophy hunted... Only 33% of hunters even want this and we should not be catering to them, but rather look at the numbers , understand the grave impact and do not delist them.	Population parameters	I do not believe grizzly bears should be taken off of the endangered species list. Their population is not even fully recovered, they are struggling with loss of food due to climate change. They reproduce so slowly this will devastate their not yet fully recovered population. The ESA was not designed to have animals taken off and immediately hunted! Trophy hunted... Only 33% of hunters even want this and we should not be catering to them, but rather look at the numbers , understand the grave impact and do not delist them. Thank you.	FWS-R6-ES-2016-0042-3935

Grizzlies occupy only 1% of their historic range. AND PLEASE TAKE NOTE: Most Americans oppose delisting.	Population parameters	I am appalled at the lack of understanding of the ecosystem that the FWS should possess! I further worry that they are influenced by trophy hunters who represent a minuscule number of the American population! And are willing to destroy the people's heritage and legacy for some money. It seems this organization is misnamed since there seems to be no service to fish and wildlife only to a handful of rich hunters. Yellowstone was almost destroyed with this insane and uneducated war on wolves and now (do we learn nothing??) the same is happening with the Grizzly Bears. It is mind boggling. Please consider that: Everything in your power should be done to protect this amazing mammal. FWS proposed rule does not address the Yellowstone area population gene pool which is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. Declining food sources pose a threat to Grizzlies and this delisting will be devastating to the Grizzly's chance of survival.. Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Another natural curb in their number. Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains Grizzlies occupy only 1% of their historic range. AND PLEASE TAKE NOTE: Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years, caused by ignorant planning by humans, by the way.. Hoping for some forward thinking and moral courage here! Thank you Anne K	FWS-R6-ES-2016-0042-3905
If that means 'there are too many bears' than I suggest a recount. How large animals in a balanced ecosystem can be reduced from 100,000 in historic times, to 600-700 bears and that is considered too many..... seems like the money is doing the talking.	Population parameters	Wyoming, Montana, Idaho will suffer financially by delisting grizzly bears. While Fish and Game may get tag money, there will be millions of people who will shun those states of tourist dollars. I live in black bear country in the Sierra Nevada but will drive hundreds of miles to go to grizzly country, but if those states are willing to deprive the rest of the citizens for 'trophy' hunting, a disgusting word on the face of it, I for one won't be back! What a sell out by our government officials not to maintain our big animals for ALL OF AMERICA not just for a few. Disgusting! I have made a number of trips to Wyoming and Montana, mostly for photography over the years. I was there this last fall. Trying to even find a bear black or grizzly proved more difficult than just sitting on my couch looking out my window of my home in the mountains. If that means 'there are too many bears' than I suggest a recount. How large animals in a balanced ecosystem can be reduced from 100,000 in historic times, to 600-700 bears and that is considered too many..... seems like the money is doing the talking. I concur with Jane Goodall et. al. and their position. Attachments GB-ScientistFinal5-5-16	FWS-R6-ES-2016-0042-3923

I have heard from a number of highly reputable scientists who argue that there is insufficient genetic variation in this isolated pocket of bears to maintain a healthy population. This situation could contribute to a precipitous crash in the population and in fact is a good argument for efforts to expand the range of these bears to include corridors to other know Grizzly populations to facilitate greater genetic diversity.	Population parameters	I urge your agency to reconsider your intention to remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I have heard from a number of highly reputable scientists who argue that there is insufficient genetic variation in this isolated pocket of bears to maintain a healthy population. This situation could contribute to a precipitous crash in the population and in fact is a good argument for efforts to expand the range of these bears to include corridors to other know Grizzly populations to facilitate greater genetic diversity. The actual number of bears inhabiting the Greater Yellowstone Ecosystem is subject to methodology in inventory and may well be an indication of a stable population that would be adversely affected by removal from the endangered species list. There is absolutely no question that major food sources such as Whitebark pine nuts and Cutthroat trout are suffering rapid declines, and the early onset of spring has accelerated the emergence of hungry bears from their winter dens. We don't yet know how the radical and ongoing changes attributable to climate change will affect Grizzly bears, and I strongly argue for retaining the species on the Federal List of Endangered and Threatened Wildlife.	FWS-R6-ES-2016-0042-3953
Bears take a long time to reproduce and we have taken away most of their habitat and way of life as a consequence.	Population parameters	Bears take a long time to reproduce and we have taken away most of their habitat and way of life as a consequence. The simple fact that grizzly deaths have been rising since 2002 suggests that delisting is a bad idea. This proposed rule is just baffling to me. The grizzlies still need to be protected!	FWS-R6-ES-2016-0042-3970

The simple fact that grizzly deaths have been rising since 2002 suggests that delisting is a bad idea. This proposed rule is just baffling to me. The grizzlies still need to be protected!	Population parameters	Bears take a long time to reproduce and we have taken away most of their habitat and way of life as a consequence. The simple fact that grizzly deaths have been rising since 2002 suggests that delisting is a bad idea. This proposed rule is just baffling to me. The grizzlies still need to be protected!	FWS-R6-E5-2016-0042-3970
But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48.	Population parameters	Please see attached comment. Attachments Letter to the FWS on De-listing the Grizzly	FWS-R6-E5-2016-0042-3929

The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. Also, even with protections, 59 grizzlies were killed in 2015.	Population parameters	I am writing to voice my OPPOSITION to the delisting of the GYE Grizzly Bear. I have many reasons which include the following: FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted, but they barely survive in 4% of their historic range in the lower 48 states. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups like WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. Also, even with protections, 59 grizzlies were killed in 2015. Another reason the grizzly should not be delisted is the fact that wildlife watchers pay millions of dollars each year to come to Yellowstone to see wolves and bears. I am a part of that statistic. Yellowstone National Park was our first established park and it is a national heritage. I, as a wildlife watcher, have just as much right to see grizzlies in the wild running free and safe as do trophy hunters have to kill them. Only difference is my activity doesn't take away from others. It is a rare treat to see a grizzly in the park while they are protected. I can only imagine the decline in sightings once they are delisted. If grizzlies can't be seen many tourist will find no reason to visit Yellowstone anymore. Tourist dollars will decline. All our favorite bears that we have followed for years and years will be targeted. #399, a 20 year old sow is already lined up in several hunter's scopes. Is it because she would be a great trophy on a wall? NO!! In fact she is targeted because she is loved by thousands of adoring watchers that have watched her raise cubs over the years. They want to kill her just to hurt her admirers. One important thing I want to point out is that there is this misconception that some seem to think that if there is a hunting season for grizzlies then there will be more tolerance towards them. That is so far from the truth. They said that about the wolves, as well, and look at the mass hatred that builds stronger and stronger each season. Each year more and more intolerance builds and the lust for blood increases. As the old saying goes if you give a little then they want more and more and more. Why recover a species just to hunt them back to critical levels again? Climbing back up from a decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. Even then infant mortality is greater than 50%. Also you can't trust Montana, Idaho, Wyoming to be fair in protecting and maintaining the grizzly populations. They proved that when they were given control over the wolf populations. They only cater to the trophy hunters and ungulate hunters. As a matter fact, Wyoming failed so miserably that the Federal government had to take control back from them with regards to the wolves. Their track record is clearly unhealthy for the wildlife management.	FWS-R6-ES-2016-0042-4218
Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America.	Population parameters	No one really knows how many grizzlies are in the GYE. The shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foods, are a threat to the grizzly's long term survival. The bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine which is a critically important food source." Climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. 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He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. The approach of letting states manage the bears is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. A recent national poll on behalf of the HSUS and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium.	FWS-R6-ES-2016-0042-4226

The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely.	Population parameters	Please do NOT remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife! 1) The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. 2) Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. 3) Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations in particular and with humans in general can be expected as grizzlies are forced to range ever farther looking for food sources to replace those lost in recent years. 4) GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, they are particularly vulnerable to excessive killing by humans. Last year 59 grizzlies were killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow-reproducing species. 5) TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states KNOWN for their hatred of and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and MOST Americans (55%) OPPOSE de-listing. Even more Americans (68%) OPPOSE the hunting of grizzly bears. Thank you, HJ	FWS-R6-ES-2016-0042-4240
EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. A DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. A GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected.	Population Parameters	Florida's Bear Hunt was a travesty with 300 bears killed in 2 days, some with babies even though that was against the rules. My family has a second home in Montana in Polson and this is just wrong. THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources. DECLINE OF WHITEBARK PINE HAS BEARS EATING MORE MEAT WHICH PUTS THEM IN MORE CONFLICT WITH HUMANS. This includes hunters and livestock operators. 80% of all grizzlies die due to human causes. GRIZZLY DEATHS ARE INCREASING AT A RATE OF 9-11% A YEAR, FROM 2002-2011. Thus, the population is not stable and should remain protected. #DontDelistGrizzlies! #ROAR!	FWS-R6-ES-2016-0042-4229

Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains.	Population Parameters	Please do NOT remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife! 1) The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. 2) Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. 3) Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations in particular and with humans in general can be expected as grizzlies are forced to range ever farther looking for food sources to replace those lost in recent years. 4) GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, they are particularly vulnerable to excessive killing by humans. Last year 59 grizzlies were killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow-reproducing species. 5) TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states KNOWN for their hatred of and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and MOST Americans (55%) OPPOSE de-listing. Even more Americans (68%) OPPOSE the hunting of grizzly bears. Thank you, HJ	FWS-R6-ES-2016-0042-4240
(1) the population has not grown in recent decades, (2) death rates have actually increased, and (3) changes to food sources puts grizzly bears in greater conflict with humans	Population Parameters	I oppose delisting of grizzly bears because (1) the population has not grown in recent decades, (2) death rates have actually increased, and (3) changes to food sources puts grizzly bears in greater conflict with humans First, even the United States Fish & Wildlife Service concedes that the Yellowstone grizzly population has not grown since the early 2000s. Indeed, there are nearly as many bears in the ecosystem today as there were 15 years ago. It is true the bears are more visible but this is not due to a population increase. Rather, this is due to changing food sources which force grizzlies to range further in search of food. Even though they are omnivores, not all foods are created equal. We humans, as omnivores, know that a steak does not equal a salad. With the loss of whitebark pine, grizzlies have turned to a diet more focused on meat. This conversion to meat puts bears in greater conflict with humans - namely hunters and livestock operations. What happens when grizzlies conflict with humans? Grizzlies die. In fact, a record number of grizzly bears died in the Yellowstone ecosystem just last year. Moreover, 80% of adult grizzly deaths can be attributed to human causes. Grizzly bear deaths are actually increasing in the ecosystem. From 2002-2011, grizzly deaths increased at a rate of 9-11% a year. Therefore, the population is not necessarily stable. With a stagnant growth rate and increasing death rate, why would USFWS even be considering removing these bears from the Endangered Species List? Please listen to the science - the best available science - and keep Yellowstone area grizzly bears protected under the Endangered Species Act.	FWS-R6-ES-2016-0042-4244

Why recover a species just to hunt them back to critical levels again? Climbing back up from a decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. Even then infant mortality is greater than 50%.	Population parameters	I am writing to voice my OPPOSITION to the delisting of the GYE Grizzly Bear. I have many reasons which include the following: FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted, but they barely survive in 4% of their historic range in the lower 48 states. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups like WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. Also, even with protections, 59 grizzlies were killed in 2015. Another reason the grizzly should not be delisted is the fact that wildlife watchers pay millions of dollars each year to come to Yellowstone to see wolves and bears. I am a part of that statistic. Yellowstone National Park was our first established park and it is a national heritage. I, as a wildlife watcher, have just as much right to see grizzlies in the wild running free and safe as do trophy hunters have to kill them. Only difference is my activity doesn't take away from others. It is a rare treat to see a grizzly in the park while they are protected. I can only imagine the decline in sightings once they are delisted. If grizzlies can't be seen many tourist will find no reason to visit Yellowstone anymore. Tourist dollars will decline. All our favorite bears that we have followed for years and years will be targeted. #399, a 20 year old sow is already lined up in several hunter's scopes. Is it because she would be a great trophy on a wall? NO!! In fact she is targeted because she is loved by thousands of adoring watchers that have watched her raise cubs over the years. They want to kill her just to hurt her admirers. One important thing I want to point out is that there is this misconception that some seem to think that if there is a hunting season for grizzlies then there will be more tolerance towards them. That is so far from the truth. They said that about the wolves, as well, and look at the mass hatred that builds stronger and stronger each season. Each year more and more intolerance builds and the lust for blood increases. As the old saying goes if you give a little then they want more and more and more. Why recover a species just to hunt them back to critical levels again? Climbing back up from a decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. Even then infant mortality is greater than 50%. Also you can't trust Montana, Idaho, Wyoming to be fair in protecting and maintaining the grizzly populations. They proved that when they were given control over the wolf populations. They only cater to the trophy hunters and ungulate hunters. As a matter fact, Wyoming failed so miserably that the Federal government had to take control back from them with regards to the wolves. Their track record is clearly unhealthy for the wildlife management.	FWS-R6-ES-2016-0042-4218
When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. x FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting.	Population parameters	No one really knows how many grizzlies are in the GYE. The shortage of cutthroat trout and whitebark pine nuttwo of the grizzly's primary foods, are a threat to the grizzly's long term survival. The bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine which is a critically important food source." Climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. 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At minimum, says GYC, a delay in the onset of hunting until the states have demonstrated their commitment to maintaining a stable population, particularly given the record high number (59) of bears killed in 2015, seems prudent. The leading cause of bear mortality is conflicts with humans. The approach of letting states manage the bears is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. A recent national poll on behalf of the HSUS and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium.	FWS-R6-ES-2016-0042-4226

When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods."	Population parameters	American Parks and federal lands have become playgrounds for the rich trophy hunters while average Americans foot the bill. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting.	FWS-R6-ES-2016-0042-4233
The conclusions set forth in the Rule are not supported by the facts relied on by the Service. The Rule asserts the GYE population of grizzlies is recovered, sustainable, and will not be adversely impacted by the anticipated mortality resulting from hunting and management. However, the numbers dont add up. When you add the acknowledged slow down in growth due to white bark pine, which has cut population growth by 96% (7% to .3% on the high end), then add the 20% expected mortality from hunting, you are effectively imposing a cull on the GYE grizzly population. A population which the Rule never suggests is excessive. The Rule only suggests the population is now at carrying capacity. Add to this the 25 grizzlies killed by wildlife managers last year alone and the Rule clearly sets up a dramatic and adverse reduction in population numbers. Further, despite the white barn pine issue being critical to the 9th Circuits conclusion to prevent delisting, the Rule dismisses the impact of white bark pine with almost no substantive explanation. The Rule simply characterizes population slow down as carrying capacity without any meaningful explanation (or effort to refute) the correlation between population trend and availability of critical food sources. Further, the Rule acknowledges only one third of the population doesnt eat white bark pine; the other two thirds of the population do. The Service is required to treat the population as a whole, and the majority relies on white bark pine pine.	Population parameters	I strongly OPPOSE the planned delisting of Yellowstone area grizzly bears under the terms of the proposed Rule for the following reasons: I. The conclusions set forth in the Rule are not supported by the facts relied on by the Service. The Rule asserts the GYE population of grizzlies is recovered, sustainable, and will not be adversely impacted by the anticipated mortality resulting from hunting and management. However, the numbers dont add up. When you add the acknowledged slow down in growth due to white bark pine, which has cut population growth by 96% (7% to .3% on the high end), then add the 20% expected mortality from hunting, you are effectively imposing a cull on the GYE grizzly population. A population which the Rule never suggests is excessive. The Rule only suggests the population is now at carrying capacity. Add to this the 25 grizzlies killed by wildlife managers last year alone and the Rule clearly sets up a dramatic and adverse reduction in population numbers. Further, despite the white barn pine issue being critical to the 9th Circuits conclusion to prevent delisting, the Rule dismisses the impact of white bark pine with almost no substantive explanation. The Rule simply characterizes population slow down as carrying capacity without any meaningful explanation (or effort to refute) the correlation between population trend and availability of critical food sources. Further, the Rule acknowledges only one third of the population doesnt eat white bark pine; the other two thirds of the population do. The Service is required to treat the population as a whole, and the majority relies on white bark pine pine. It appears there is still a significant amount of uncertainty regarding the factors which prevented delisting the first time around and the Rule offers only a very superficial effort to dismiss the shortcomings this time. The conclusions therefore are not reasonable and not based on the best available science. As the Service (and the courts) are aware, the Service is mandated to proceed with institutionalized caution. Its neither legally nor morally sound to simply roll the dice with the future of a threatened species. II. State regulatory commitments clearly are not in place and are not explained. The Rule indicates over and over that viable state regulatory commitments must be in place before delisting can occur. However, the commitments are not detailed, not explained, and clearly are not binding. One of the publics biggest concerns appears to be the proposed hunting of grizzlies on the 12% of suitable habitat outside of park boundaries. What portion of the population is on the 12% outside boundaries? Whats the expectation of how much of the population will be exposed to potential hunting? What are the anticipated state commitments to ensure appropriate and sustainable hunting practices? None of this is detailed in the Rule. Further, it goes without saying that a decision to vest with the states the future of a threatened species, when those very states allowed the initial devastation to the population, is suspect. Particularly in the absence of detailed commitments and lack of enforceability. To the extent there is an inclination to trust the state wildlife agencies to manage the population, the states have already indicated that it will be open season on the population. In the event of an unacceptable numerical mortality impact on the population, the Rules proposed solution is to call a meeting and discuss potential relisting. But thats no solution at all. Meaningful commitments, and meaningful accountability, need to be in place and they clearly are not. III. Sport hunting of a threatened population is simply unacceptable. Given the historical backdrop of how these animals were wiped out through hunting and trapping, both for sport and in defense of stock the notion of reintroducing recreational hunting is unacceptable and entirely inconsistent with the history of this population. As important, sport hunting of Yellowstone grizzlies, which is not a food source, is inconsistent with a modern, mature treatment of wildlife and we deserve better from federal and state governments. While this may be unpopular to say, sometimes it is the responsibility of the federal government to impose modern and humane standards of behavior on regional populations which are not in step with contemporary norms. This countrys history is replete with examples that need no recitation here. Idaho, Montana and Wyoming legislatures and wildlife agencies have giddily embraced the prospect of sport hunting the GYE grizzly population. We cannot allow the same factors that required protection under the ESA to threaten the population again. Thats nonsensical. Let carrying capacity and nature work the requisite population control. Sport hunting is not necessary and has no justification.	FWS-R6-ES-2016-0042-4257

David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. In reality, no one really knows how many grizzlies are in the GYE. Furthermore, population growth has stagnated since the early 2000's, and the Yellowstone grizzly population declined by 59 bears in 2015 alone.	Population parameters	I am asking you to NOT delist grizzly bears in the Greater Yellowstone Ecosystem. The USFWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. However, David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. In reality, no one really knows how many grizzlies are in the GYE. Furthermore, population growth has stagnated since the early 2000's, and the Yellowstone grizzly population declined by 59 bears in 2015 alone. The USFWS also claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide. Therefore, the grizzly bear cannot be delisted in just the GYE. By USFWS own estimates, around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Furthermore, Yellowstone's Grizzly population has no connectivity with outside populations, and has not for the last 100 years. This means that today's population came from a gene pool of only 136 animals (the population low point in 1975. This lack of genetic diversity threatens the Yellowstone grizzly's survival in the long term. USFWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. Whitebark pine nuts have long been considered to be the single most important food source for grizzlies. In the last 20 years, whitebark pines have been decimated by both blister rust and pine beetles. The pine beetle epidemic has been linked to climate change. According to Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council, "Yellowstone grizzly bears are likely declining in the wake of the loss of whitebark pine, a critically important food source." 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More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. 50 percent of hunters nationwide oppose delisting of grizzlies and 62 percent of hunters support a five-year moratorium on delisting. Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. For all of these reasons I request that the USFWS should not delist the Grizzly bear, and should instead propose an additional five years of studying the stability of the population in the face of loss of food sources and climate change. It has taken four decades of hard work to achieve where the grizzly population is today. Grizzlies are one of the slowest-reproducing mammals in North America. It is too soon to risk the fate of this magnificent animal.	FWS-R6-ES-2016-0042-4260
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Grizzly bear deaths are actually increasing in the ecosystem. From 2002-2011, grizzly deaths increased at a rate of 9-11% a year. Therefore, the population is not necessarily stable. With a stagnant growth rate and increasing death rate, why would USFWS even be considering removing these bears from the Endangered Species List? Please listen to the science - the best available science - and keep Yellowstone area grizzly bears protected under the Endangered Species Act.	Population Parameters	I oppose delisting of grizzly bears because (1) the population has not grown in recent decades, (2) death rates have actually increased, and (3) changes to food sources puts grizzly bears in greater conflict with humans. First, even the United States Fish & Wildlife Service concedes that the Yellowstone grizzly population has not grown since the early 2000s. Indeed, there are nearly as many bears in the ecosystem today as there were 15 years ago. It is true the bears are more visible but this is not due to a population increase. Rather, this is due to changing food sources which force grizzlies to range further in search of food. Even though they are omnivores, not all foods are created equal. We humans, as omnivores, know that a steak does not equal a salad. With the loss of whitebark pine, grizzlies have turned to a diet more focused on meat. This conversion to meat puts bears in greater conflict with humans - namely hunters and livestock operations. What happens when grizzlies conflict with humans? Grizzlies die. In fact, a record number of grizzly bears died in the Yellowstone ecosystem just last year. Moreover, 80% of adult grizzly deaths can be attributed to human causes. Grizzly bear deaths are actually increasing in the ecosystem. From 2002-2011, grizzly deaths increased at a rate of 9-11% a year. Therefore, the population is not necessarily stable. With a stagnant growth rate and increasing death rate, why would USFWS even be considering removing these bears from the Endangered Species List? Please listen to the science - the best available science - and keep Yellowstone area grizzly bears protected under the Endangered Species Act.	FWS-R6-ES-2016-0042-4244
Grizzlies are one of the slowest-reproducing mammals in North America. It is too soon to risk the fate of this magnificent animal.	Population parameters	I am asking you to NOT delist grizzly bears in the Greater Yellowstone Ecosystem. The USFWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. However, David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. In reality, no one really knows how many grizzlies are in the GYE. Furthermore, population growth has stagnated since the early 2000's, and the Yellowstone grizzly population declined by 59 bears in 2015 alone. The USFWS also claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. 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I do not believe that Wyoming can be considered capable of maintaining populations of any large carnivore in a scientific manner, considering its dismal record of "managing" wolf populations. Its wolf management is so bad that it has had to be struck down in federal court twice. Only now that the wolf has been relisted in Wyoming are we finally seeing wolves again in Grand Teton National Park, which will prove to increase visitation to that park and consequently tourist revenue. Montana has released its management plan and is proposing a spring hunting season to run between March 15 and April 20. Yet we have already seen grizzly sows with cubs in Yellowstone National Park as early as April 16th. With warming temperatures in the future, emergence could occur even earlier than that. This means grizzly sows with new cubs could be killed and these tiny helpless bears left motherless. 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I live in the Paradise Valley north of YNP and listen and talk to scientists who are working on these issues and it does appear that, in fact, there is hard evidence available showing that the isolated grizzly bear population growth rate is flat, if not declining, for more than 10 years. For an animal in recovery with the slowest reproductive rate of any North American mammal, still today occupying only 2% of their historic habitat (and are you allowed under case law to delist isolated segments of a population listed as a single entity under the ESA? I do not think so!), and with a mortality rate of 10% in 2015, it appears to me that the Rule now open to comment is sorely lacking the kind of high level and THOROUGH analysis addressing these issues and more that is deserved by this iconic creature.	Population parameters	Grizzlies may be "generalists" when it comes to food supplies, but it is difficult to understand how you can dismiss the major dropoff in two of the GYE grizzly food sources, whitebark pine nuts and cutthroat trout, with a third major food source, cutworm moths, at high risk from the prospective drop in their availability with the introduction of GMO crops tailored to kill them in the fields where they spend most of their time. Only meat is left to the bears, along with minor food sources like forbs and grubs. And we all know the connection between meat carcasses and human interaction - whether with hunters, crossing roads or around ranchlands. It does not bode well for grizzlies. At a minimum, it seems that the diminishment of major food sources in the GYE should lead to a fuller consideration that the carrying capacity of the land has been reduced and the bears are ranging farther from their traditional territories in search of adequate diet replacements and this has not been fully evaluated in the Rule. It also does not appear to be "best science" as required by law to dismiss predictions of habitat changes that will directly affect grizzly bears without a fuller exploration of this issue than is contained in the proposed Rule. I understand that taxpayer funded data that you use has not been made available to the greater scientific community or independent scientists for review before a decision is made final on an action that is still open to much disagreement. I live in the Paradise Valley north of YNP and listen and talk to scientists who are working on these issues and it does appear that, in fact, there is hard evidence available showing that the isolated grizzly bear population growth rate is flat, if not declining, for more than 10 years. For an animal in recovery with the slowest reproductive rate of any North American mammal, still today occupying only 2% of their historic habitat (and are you allowed under case law to delist isolated segments of a population listed as a single entity under the ESA? I do not think so!), and with a mortality rate of 10% in 2015, it appears to me that the Rule now open to comment is sorely lacking the kind of high level and THOROUGH analysis addressing these issues and more that is deserved by this iconic creature. Too much is at stake. Please consider re-opening your review and include a panel of independent, qualified scientists who are working separately from current grizzly research in the GYE.	FWS-R6-ES-2016-0042-4277
Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. Å	Population parameters	#NAME?	FWS-R6-ES-2016-0042-4274

On behalf of our millions of members, we, the undersigned 84 organizations, oppose the U.S. Fish and Wildlife Service (FWS) proposal to remove grizzly bears (Ursus arctos) in the Greater Yellowstone Ecosystem (GYE) as threatened from the U.S. Endangered Species Act (ESA). The proposal is premature as the GYE grizzly bear population remains in peril from the combined effects of habitat loss and fragmentation, climate change, decline of primary food sources, and human-caused mortality. 1 Delisting and subsequently adding the threat of mortality from trophy hunting could seriously jeopardize grizzly bears	Population Parameters	Please accept as part of the record the attached letter, signed by 84 organizations, in opposition to the delisting proposal. This replaces comment tracking number 1k0-8pj9-lrmv. Attachments Yellowstone Grizzly-Sign-on Letter 2016_05.09 84	FWS-R6-ES-2016-0042-4326
GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, it is particularly vulnerable to excessive killing by humans. Last year, saw 59 grizzlies killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow reproducing species. Å	Population parameters	#NAME?	FWS-R6-ES-2016-0042-4274

YOUR CLAIM IS THAT there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), x and x that's enough to delist them. Å IN REALITY: no one really knows how many grizzlies are in the GYE.	YET Population parameters	I would like to enter the following comments about the proposed delisting of the Yellowstone Grizzly: YOUR CLAIM IS THAT there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. YET IN REALITY: no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." YOUR CLAIM IS THAT the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodis not a threat to the grizzly's long term survival. YET THE REALITY IS: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. YOUR CLAIM IS THAT your agency will stay involved with protecting the grizzly population after delisting. YET THE REALITY IS: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. YOUR CLAIM IS THAT: Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. YET THE REALITY IS THAT:This approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. = = = = = SPECIAL OBJECTIONS!!! = = = = = YOUR CLAIM IS THAT: your agency looks forward to hearing from the public about delisting. YET THE REALITY IS: A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. YOU CLAIM THAT your agency claims to look forward to consulting with Native American tribes about the delisting. AND YET IN REALITY: Fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and fish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations."	FWS-R6-ES-2016-0042-4382
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They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations."	FWS-R6-ES-2016-0042-4382

Large-bodied carnivores are sparsely populated across vast areas; they are slow to reproduce, provide extended parental care to their young, and social stability promotes their resiliency. 12 Human persecution affects their social structure, 13 harms their persistence, 14 and is a super additive effect meaning that hunting pressures far exceed what would occur in nature.15 Hunting mortality has direct effects on population growth rates because of increased mortality, but it can have indirect effects, too, such as disrupting the sex and age structure of a population.16 Hunting bears during their period of hyperphagia is energetically costly to them as they shift their sleeping patterns and become more nocturnal to avoid being hunted, 17 and hunting females can influence a lifetime of reproductive success.18 Females with cubs generally avoid males as a strategy of avoiding sexually-selected infanticide, but this means that they often choose suboptimal habitats, including in closer proximity to humans, and this affects their diet quality and reduces their reproductive potential. 19 Hunting makes the risk of sexually-selected infanticide greater, which leads to increased avoidance of males by females, and, ultimately, to lower fecundity.20 Right now, an unsustainable number of grizzly bears are dying in the GYE. In 2015, approximately 60 grizzly bears excluding the bears that agents could not find are known to have died in the GYE from various causes. 21 This is a substantial portion of the estimated population of the slowest-reproducing mammal in North America. Meanwhile, more than half of grizzly bears killed by humans go unreported from 46 to 66 percent.22	Population Parameters	Please accept as part of the record the attached letter, signed by 84 organizations, in opposition to the delisting proposal. This replaces comment tracking number 1k0-8pj9-lrmv. Attachments Yellowstone Grizzly-Sign-on Letter 2016_05.09 84	FWS-R6-E5-2016-0042-4326
While there is no doubt that grizzlies have come a long way in the Yellowstone area since 1972 when there were maybe 130 left, they have a long way to go. Recovery is in serious jeopardy with at least 70 bears killed last year. Numbers have flatlined and reproduction is probably declining. The population is aging.	Population Parameters	Hello and thank you for this opportunity to comment on the proposed delisting of the Yellowstone grizzly bear population. I oppose this proposal for many reasons. My comments are dedicated to the memory of Scarface, a magnificent male grizzly who was about 25 years old and was shot and left for dead last fall outside of Jardine, Montana. I have some great memories of watching him - he was a smart and wiley old bear who caused no problems for people, but still got shot. Chris Servheen, the federal coordinator for grizzly bear recovery, is mostly interested in his own career, and delisting is mainly a political and personal objective for him. He is arrogant and selfish and should have been fired long ago. While there is no doubt that grizzlies have come a long way in the Yellowstone area since 1972 when there were maybe 130 left, they have a long way to go. Recovery is in serious jeopardy with at least 70 bears killed last year. Numbers have flatlined and reproduction is probably declining. The population is aging. The Yellowstone ecosystem is under heavy pressure from human population and development, with more wild habitat developed every day. While the heyday of logging and road building has passed, recreational development and activity has skyrocketed. Grizzly habitat is getting crushed. Subdivisions are sprouting up everywhere. I live in Bozeman, where everything is former grizzly habitat (my house included), and the pace of development is mind blowing. Meanwhile grizzlies are losing some of their major food sources - whitebark pine, cutthroat trout, army cutworm moths. This is forcing them to seek more protein (elk, deer, livestock), which humans also want, bringing the bears into more conflict with ranchers and hunters, and bringing the bears into forests and ranchlands (where there are more people) instead of staying in the high country. Not to mention that hundreds of bison are removed from the ecosystem nearly every year due to paranoia about brucellosis. How many grizzlies could those bison feed? Nor can grizzlies safely or effectively reach other populations of grizzlies to the north, meaning the Yellowstone grizzlies are totally isolated. Thus they cannot interbreed with other populations nor supplement their numbers from outside the ecosystem. One can hardly call this recovery. Instead we should be reintroducing grizzlies to the extensive public wildlands of Central Idaho. Delisting will mean turning management over to the states of Montana, Wyoming and Idaho, all of whom are drooling over the chance to hunt grizzlies. This makes me sick. So we spend all this time and effort to recover the grizzly, just so some rednecks can turn them into trophies? Is that the best we can do? I work as a guide and naturalist in Yellowstone Park. The biggest thing my guests want to see is bears and wolves, especially grizzly bears. People pay a lot of money to come here with the hope of seeing these animals. They get to enjoy them and leave them for others to do the same. Hunting predators like grizzlies is selfish and greedy, and is a one-time use. What it really comes down to is respect for other lives than our own. Can we be wise enough and tolerant enough to let the great bear exist on its own merit? Or must we take away the protection they need so we can pretend we have saved them? Attachments DSC07180	FWS-R6-E5-2016-0042-4434

The current population of Grizzly Bears is genetically isolated, while they might be making a comeback in specific areas they are nowhere near high enough in number to maintain a healthy, stable, viable population without our help. Delisting them now, when their populations are so small and their world so fragile could potentially be catastrophic, please consider maintaining their endangered status.	Population parameters	The current population of Grizzly Bears is genetically isolated, while they might be making a comeback in specific areas they are nowhere near high enough in number to maintain a healthy, stable, viable population without our help. Delisting them now, when their populations are so small and their world so fragile could potentially be catastrophic, please consider maintaining their endangered status.	FWS-R6-E5-2016-0042-4451
The bear population has surpassed management goals and as their populations continue to expand, increased interactions with humans are inevitable.	Population parameters	De-listing the grizzly bear is the only logical decision. The bear population has surpassed management goals and as their populations continue to expand, increased interactions with humans are inevitable. What is the end game if reaching the goal does not clear them from the list? The fact of the matter is that bears will end up dead either at the hands of state game officials (when a bear inevitably attacks people/pets/livestock) or through legal hunting (helping balance the land's carrying capacity and population). This model has been proven over and over again. Bringing back legal and limited hunting will funnel additional funds, research, and education into the bears. Perpetuated listing will be a drain on the finite amount of funds budgeted for all listed species (yea, that means the Columbia Basin Pygmy Rabbit will get additional funds). While we're at it, de-listing doesn't mean every bear has a target on it, it merely changes the management strategy to allow for very limited and controlled harvest. Furthermore, as was eloquently stated by Steve Rinella in his NYT editorial, WY, MT, and ID are well versed in game management (you know, actual science not "feelings"). If de-listed, populations will be closely tracked, and bears harvested will be counted toward a cap. When the cap is met, hunting is cut off. If the cap is exceeded, the numbers for the next year are reduced. If the bears have a rough year (cold winter, fewer surviving cubs, etc.) the take can be reduced to zero until managements goals again allow for controlled harvest.	FWS-R6-E5-2016-0042-4497

Thus they cannot interbreed with other populations nor supplement their numbers from outside the ecosystem. One can hardly call this recovery. Instead we should be reintroducing grizzlies to the extensive public wildlands of Central Idaho. Delisting will mean turning management over to the states of Montana, Wyoming and Idaho, all of whom are drooling over the chance to hunt grizzlies.	Population Parameters	Hello and thank you for this opportunity to comment on the proposed delisting of the Yellowstone grizzly bear population. I oppose this proposal for many reasons. My comments are dedicated to the memory of Scarface, a magnificent male grizzly who was about 25 years old and was shot and left for dead last fall outside of Jardine, Montana. I have some great memories of watching him - he was a smart and wiley old bear who caused no problems for people, but still got shot. Chris Servheen, the federal coordinator for grizzly bear recovery, is mostly interested in his own career, and delisting is mainly a political and personal objective for him. He is arrogant and selfish and should have been fired long ago. While there is no doubt that grizzlies have come a long way in the Yellowstone area since 1972 when there were maybe 130 left, they have a long way to go. Recovery is in serious jeopardy with at least 70 bears killed last year. Numbers have flattened and reproduction is probably declining. The population is aging. The Yellowstone ecosystem is under heavy pressure from human population and development, with more wild habitat developed every day. While the heyday of logging and road building has passed, recreational development and activity has skyrocketed. Grizzly habitat is getting crunched. Subdivisions are sprouting up everywhere. I live in Bozeman, where everything is former grizzly habitat (my house included), and the pace of development is mind blowing. Meanwhile grizzlies are losing some of their major food sources - whitebark pine, cutthroat trout, army cutworm moths. This is forcing them to seek more protein (elk, deer, livestock), which humans also want, bringing the bears into more conflict with ranchers and hunters, and bringing the bears into forests and ranchlands (where there are more people) instead of staying in the high country. Not to mention that hundreds of bison are removed from the ecosystem nearly every year due to paranoia about brucellosis. How many grizzlies could those bison feed? Nor can grizzlies safely or effectively reach other populations of grizzlies to the north, meaning the Yellowstone grizzlies are totally isolated. Thus they cannot interbreed with other populations nor supplement their numbers from outside the ecosystem. One can hardly call this recovery. Instead we should be reintroducing grizzlies to the extensive public wildlands of Central Idaho. Delisting will mean turning management over to the states of Montana, Wyoming and Idaho, all of whom are drooling over the chance to hunt grizzlies. This makes me sick. So we spend all this time and effort to recover the grizzly, just so some rednecks can turn them into trophies? Is that the best we can do? I work as a guide and naturalist in Yellowstone Park. The biggest thing my guests want to see is bears and wolves, especially grizzly bears. People pay a lot of money to come here with the hope of seeing these animals. They get to enjoy them and leave them for others to do the same. Hunting predators like grizzlies is selfish and greedy, and is a one-time use. What it really comes down to is respect for other lives than our own. Can we be wise enough and tolerant enough to let the great bear exist on its own merit? Or must we take away the protection they need so we can pretend we have saved them? Attachments DSC07180	FWS-R6-ES-2016-0042-4434
Grizzly bear mortality by all causes (human and natural) is precarious at best. Sport(Trophy) hunting can easily push bear mortality past the brink of recovery. The Grizzly bear reproductive rate is extremely low making any recovery very slow.(Kind of like the white bark pine). Once Grizzly deaths exceed births you are headed towards extinction. De-listing would accelerate this and the proposed controls are to slow reacting to properly ward this off. The Grizzly bear population has leveled out in recent years and the cause of this leveling off should be identified by further research.	Population parameters	I am writing you to request that you not de-list the Grizzly Bear from the ESA, Climate change's effect on the food sources of the Yellowstone ecosystem are profound. They alone are reason enough never to de-list the Yellowstone Grizzly. The white bark pine nuts are a major Grizzly food source, and have all but disappeared from Yellowstone due to higher winter temperatures. The white bark pine is also found in high remote unoccupied areas where the female Grizzly can feed undisturbed. Army cutworm moths, another Grizzly food source found in high talus fields are being pushed north out of Yellowstone by rising temperatures, and pesticide spraying in the plains states. As the weather gets hotter and dryer it stresses the vegetation and grasses the base animals depend on, causing a decline in the food quality for Elk, Bison and rodents, all bear food source. Cutthroat Trout are also disappearing, after the appearance of Lake Trout in Yellowstone lake. The efforts to eradicate the Lake trout have been expensive and un-successful. Grizzly bear mortality by all causes (human and natural) is precarious at best. Sport(Trophy) hunting can easily push bear mortality past the brink of recovery. The Grizzly bear reproductive rate is extremely low making any recovery very slow.(Kind of like the white bark pine). Once Grizzly deaths exceed births you are headed towards extinction. De-listing would accelerate this and the proposed controls are to slow reacting to properly ward this off. The Grizzly bear population has leveled out in recent years and the cause of this leveling off should be identified by further research. The power and push of the states to grant hunting rights to the wealth few to increase revenue is offset by the money spent by others to see wild Grizzlies. I live in a state that had, or may have them and I feel the sorrow of their absence. Thank you for the chance to present a few random thoughts.	FWS-R6-ES-2016-0042-4505

By the estimations in you proposal, the bear population in the lower 48 is approx. 1680 bears, spread out between the 6 areas including Yellowstone. Naturalists' do not consider the subject county nor the situation enough in number to sustain a healthy species. According to EParks, there are approx. 1,300 grizzly bears living in the wild today. In the 1800's, an estimated 50,000 grizzlies populated the lower 48 between the Great Plains and the Pacific Coast. The range of occupation now is 2% of it's former natural habitat. (www.eparks.org) I apologize for the improper documentation, but I assure you all data is valid so far is available on available websites.	Population parameters	Hello, Being clear that this initiative isn't related to the increase in size of the Grizzly population in Yellowstone Park, but rather the management of space to allow enough "secure habitat" to accommodate the growing, yet minuscule in the larger view of saving a species, would have garnered more respect. By the estimations in you proposal, the bear population in the lower 48 is approx. 1680 bears, spread out between the 6 areas including Yellowstone. Naturalists' do not consider the subject county nor the situation enough in number to sustain a healthy species. According to EParks, there are approx. 1,300 grizzly bears living in the wild today. In the 1800's, an estimated 50,000 grizzlies populated the lower 48 between the Great Plains and the Pacific Coast. The range of occupation now is 2% of it's former natural habitat. (www.eparks.org) I apologize for the improper documentation, but I assure you all data is valid so far is available on available websites. It widely reported that 80% of bear mortality rates are caused by humans. Their official and unofficial encroachment on "secure habitat" for bears, the need to put bears down due to lack of fear of humans, as the bears have become spectacles for those in cars, watching as the bears feed from garbage dumpsters, among other reasons bears and humans clash. Of the 5 suggested remaining sites that could sustain bears, Selkirk, the Northern Cascades, and the Cabinet-Yaak area, apparently have the space but lack the resources to inhabit grizzly bears, as those pops. have been lost. The Bitterroot Recovery Zone is a laughable suggestion, as they apparently are barren of bears though they sit just atop and to the west of Yellowstone. The Northern Continental Divide Ecosystem is evidently the only thriving (unprotected?) bear population, this may be due to being the only site large enough to absorb human interference. Losing protection, this still endangered species, the Yellowstone grizzly, hasn't a large enough population to survive, and without repeating the same strategies implemented in 1974, will become an American National Park without grizzly bears. This will most likely, as with toying with the Yellowstone wolf population, lead to the eventual extinction of a species so ingrained in North American history that it can't be understated. Should you outlive the fruition of the decreasing 2% of habitable land for this national symbol to exist, the history of these misguided intentions, taking another step closer to snuffing out of this species, will still be with us all. Something of America will have been lost, and all your words will not bring it back.	FWS-R6-ES-2016-0042-4554
Since 2003 there have been approximately 700 grizzlies reported in the Greater Yellowstone Ecosystem. Numbers for 2015 are 717. These numbers do not suggest recovery but simply the same number of bears over 12 years, give or take, and these bears are dispersing. If they were leaving because of increased population, not lack of food, we would expect to see an increase in the number of bears. This has not happened.	Population Parameters	May 9, 2016 The Portneuf Valley Audubon Society is opposed to delisting the Yellowstone grizzly from the Federal List of Endangered and Threatened Wildlife for the following reasons: 1.) We do not trust the states to do a good job. Wyoming has done so badly with wolves that a federal judge took management away from them. Idaho Fish and Game sneaked a hunter into the Frank Church-River of No Return Wilderness to kill wolves because they felt the wolves were taking too many elk in the Chambelain Basin. This was done without public knowledge or input. The state fish and game agencies are under constant pressure to kill predators from state politicians who oppose their protection and wish to see them eradicated. Grizzlies, and largest and most charismatic of western omnivores, would certainly be no exception. 2.) There is not strong evidence that the Yellowstone grizzly has recovered. The U.S. Fish and Wildlife Service claims that the bears are recovered because they are dispersing out of Yellowstone National Park and the primary conversation area. However, they could well be moving out of the area because of lack of food. Their primary protein source, the cutthroat trout, is gone from Yellowstone Lake and related spawning streams because of the lake trout. Other food sources like the whitebark pine nut stands are also failing. Stand that are still viable are outside of the park and in areas where the grizzlies would be hunted and killed. Since 2003 there have been approximately 700 grizzlies reported in the Greater Yellowstone Ecosystem. Numbers for 2015 are 717. These numbers do not suggest recovery but simply the same number of bears over 12 years, give or take, and these bears are dispersing. If they were leaving because of increased population, not lack of food, we would expect to see an increase in the number of bears. This has not happened. 3.) Finally, we believe the wish on the part of U.S. Fish and Wildlife Services to delist the Yellowstone grizzly could well be due to politics, not science. It is well known that the current director, Dan Ashe, is no friend of endangered and threatened species. He has been hostile to wolf recovery, listing the obviously threatened sage grouse, and is willing to allow wind farms' collateral kill of bald eagles to increase from 1000 to 4000 annually. For these reasons we oppose delisting the Yellowstone grizzly. It is obvious the bears are a favorite with the public and we fear, with good reason, that the states of Wyoming and Idaho will do their best to kill them once federal protection is removed. Jackie Johnson Maughan, treasurer	FWS-R6-ES-2016-0042-4648

The proposed rule does not address genetic isolation of the bears. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. A	Population Parameters	There are several reasons to not delist the Grizzly Bear: The proposed rule does not address genetic isolation of the bears. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - Declining food sources. Historically bears dependent on 4 food sources - 2 of which (whitebark pine and cutthroat trout) are disappearing and moths, their third main food source, are unreliable food source due to pesticides. - Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population. - Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. - Grizzlies occupy only 1% of their historic range. - Most Americans oppose delisting. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - Bears will be killed even if they remain protected. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. - If hunting is allowed, there should be a 5-year moratorium on hunting until states can prove that they can manage the grizzly population effectively. - If hunting is allowed, there must be buffer zones around national parks and a no-hunt zone in between Yellowstone and Grand Teton national park. - DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states known for their hatred and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and most Americans (55%) oppose delisting. Even more Americans (68%) oppose hunting of grizzly bears if delisted. - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears. - GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, it is particularly vulnerable to excessive killing by humans. Last year, saw 59 grizzlies killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow reproducing species. - NEARLY 50 TRIBES OPPOSE DELISTING OF GRIZZLIES. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly oppose delisting and hunting of these bears, which they consider to be sacred animals. - EXPERTS OPPOSE REMOVING GRIZZLIES FROM THE ENDANGERED SPECIES LIST. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted. - THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc.	FWS-R6-ES-2016-0042-4679
Grizzlies are one of the slowest reproducing mammals in North America. As a result, loss of several females in a year could be devastating for the population.	Population Parameters	There are several reasons to not delist the Grizzly Bear: The proposed rule does not address genetic isolation of the bears. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - Declining food sources. Historically bears dependent on 4 food sources - 2 of which (whitebark pine and cutthroat trout) are disappearing and moths, their third main food source, are unreliable food source due to pesticides. - Grizzlies are one of the slowest reproducing mammals in North America. 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"Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears. - GRIZZLY BEARS ARE ONE OF THE SLOWEST REPRODUCING LAND MAMMALS. As a result, it is particularly vulnerable to excessive killing by humans. Last year, saw 59 grizzlies killed by humans in the Yellowstone ecosystem. We need to determine if this is a continuing trend or a blip before allowing hunting and jeopardizing this slow reproducing species. - NEARLY 50 TRIBES OPPOSE DELISTING OF GRIZZLIES. The indigenous tribes of North America revere and respect the grizzly bear. The tribes adamantly oppose delisting and hunting of these bears, which they consider to be sacred animals. - EXPERTS OPPOSE REMOVING GRIZZLIES FROM THE ENDANGERED SPECIES LIST. Nearly two in three grizzly bear experts familiar with the Greater Yellowstone Ecosystem's population recommend that the region's bears either maintain their current "threatened" status or be elevated to a more protected "endangered" level under the Endangered Species Act. Experts worried about habitat loss, habitat modification and human-caused grizzly mortality most when considering whether grizzlies should be delisted. - THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc.	FWS-R6-ES-2016-0042-4679
EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food x sources. A	Population parameters	THE PROPOSED RULE DOES NOT SUFFICIENTLY OR ACCURATELY ADDRESS CARRYING CAPACITY AND NUTRITIONAL ECOLOGY THAT ARE CONVOLUTED AND NOT WELL THOUGHT OUT. There is good reason to believe that carrying capacity for grizzly bears within the confines of Yellowstone's Primary Conservation Area has actually declined, probably substantially so. Grizzlies have lost a significant amount of food sources in recent years due to drought, human activity, climate change etc. EVEN USFWS CONCEDES THAT BEAR POPULATION HAS NOT GROWN SINCE EARLY 2000s. We have nearly as many bears now as 15 years ago. While the population has not grown - or has even decreased slightly, density of bears has also decreased. This is because bears are having to roam further and further in search of food sources.	FWS-R6-ES-2016-0042-4805

The population has grown but not to a substantial amount	Population parameters	It is not in the best interest of the grizzly bear to be taken off the endangered species list for many reasons. 1) The population is not spread out far enough to ensure a healthy gene pool for future generations 2) The population has grown but not to a substantial amount 2.1) The hunting of Grizzly bears will become rapidly popular and the population will not be able to keep up with demand from the hunting season. The number of deaths will be greater than births. 2.2) As a result of a population not being able to keep up the bears will shortly be put back into a dangerous number 3) Once you've opened the Grizzly Bear to hunting, eventually if the time comes to revoke that decision, the amount of poachers will be greater than it is today.	FWS-R6-ES-2016-0042-4865
BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. This is the kind of thing that removing Grizzlies from the Endangered List will become the norm for Montana, Wyoming and and Idaho, under the guise of protecting the bears.	Population parameters	In memory of Scarface, who was killed by a hunter in November, and news of his death was withheld until after the comment period to State Fish and Wildlife, and as the deadline for commenting on this Docket, I would like to add to my previous statements. Issue No. 1 - Grizzlies in the Greater Yellowstone Ecosystem continue to face catastrophic losses to several of their key food sources, such as white bark pine and cutthroat trout. The service's recent research on white bark pine offers no reason to believe that bears will continue to flourish in the Yellowstone Ecosystem in the absence of functioning and healthy white bark pine stands. Simply stating that "bears are omnivores so they'll find alternatives" does not adequately address the concerns raised by the Federal District Court Judge Molloy, affirmed by the Ninth Circuit Court of Appeals. Issue No. 2 - Grizzly mortality is already at record high levels, which has caused population growth to stagnate and even decline. The service's research has clearly demonstrated the correlation between white bark pine productivity and grizzly bear mortality. Now that white bark pine are effectively not a viable food for bears anymore, years of record high mortality will become the 'norm.' The idea of allowing discretionary mortality (i.e. trophy hunting) even while grizzlies are already dying in record numbers because of natural causes and human intervention is short-sighted and unnecessary. Issue No. 3 - The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. Issue No. 4 - The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the long term. Issue No. 5 - In Wyoming, where Governor Mead has already expressed his approval of Bear Trophy Hunting, the decision of the USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). Issue No. 6 - USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the white bark pine stands and potential impacts on denning habitat. Issue No. 7 - What's the Rush? There are too many unknowns right now, regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population. Why not wait five years to see how the population is responding to these threats? Why are the states in such a rush to allow trophy hunting of bears and destroy this beautiful icon of wildlife in the GYE? Issue No. 8 - BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. This is the kind of thing that removing Grizzlies from the Endangered List will become the norm for Montana, Wyoming and and Idaho, under the guise of protecting the bears. The only protections these states want is to line their state coffers by the trophy hunters. For each issue I've given, I believe that we need to achieve a balance between the needs of the people and nature, without arbitrary deadlines created to force through politically expedient decisions, or we all lose. While nothing will bring back Scarface, Blaze or any of the numerous wildlife that has lost it's life to humans, we need to honor these icons of the GYE and their descendants and all bears that share the landscape that they once roamed.	FWS-R6-ES-2016-0042-4878

As a trained conservationist, with a background in field biology work, I am adamantly opposed to this proposal. I have followed the research around Yellowstone grizzlies since college and am well aware of the issues affecting the Great Yellowstone Grizzly Bear population. This population of bears are an island population - there are significant barriers to this population being able to connect with other populations of bears due to habitat fragmentation which leads to genetic isolation and genetic inbreeding. Given the grizzlies slow reproduction rate, loss of food sources like the white bark pine nuts, potential declining populations of cutthroat trout due to climate change, habitat losses outside of the park, I feel that this proposal is ill advised.	Population parameters	As a trained conservationist, with a background in field biology work, I am adamantly opposed to this proposal. I have followed the research around Yellowstone grizzlies since college and am well aware of the issues affecting the Great Yellowstone Grizzly Bear population. This population of bears are an island population - there are significant barriers to this population being able to connect with other populations of bears due to habitat fragmentation which leads to genetic isolation and genetic inbreeding. Given the grizzlies slow reproduction rate, loss of food sources like the white bark pine nuts, potential declining populations of cutthroat trout due to climate change, habitat losses outside of the park, I feel that this proposal is ill advised. With the reintroduction of wolves, the ungulate population in parts of the of the Park appear to be in decline - another food source loss will potentially cause bears to roam farther in search of food. The unknown and potential flora losses, which are a large part of the bears diet, due to climate change cannot be overlooked and could contribute to further expansion of territories outside the Park. As a keystone species, the grizzlies influence on helping protect other sensitive species, like wolverines and lynx (as well as other non-mega fauna), is significant and crucial to species diversity in the northern Rockies. I lived in western Montana for 6 years and did field biology work, which involved direct interaction with the public, as well as working in the private sector during the winter months. The shoot, shovel and shut up mentality is still very much alive there with some of the population, which would be all to eager to illegally hunt bears. And that is to say nothing about the state governments in the area which can be heavily influenced by the cattle and timber extraction industries. I do not doubt that hunting grizzlies will be a trophy sport if the state is able to regulate the bear populations just like Idaho wants to do with wolves and grizzlies - and that is unacceptable on every level. The FWS is supposed to protect species in need for their benefit, regardless of political influence. Has the FWS looked at all the encompassing issues surrounding the bears? What about potential long term affects to the population? I believe that this has not happened. Don't play to the pressure of the states of Montana, Idaho, or Wyoming as they have shown previous unacceptable management plans for other species - i.e wolves. Delisting grizzlies in the Greater Yellowstone Ecosystem will have negative repercussions to that species, and many more. Please take the ecological high ground, the long term vision, and don't cave to political pressure. My family visits Yellowstone as much asd possible and my children would like to see a wild grizzly bear. They are depending on your agency to make the right choice. Please - do not delist the Yellowstone grizzly bear. Look at the science not the politics.	FWS-R6-ES-2016-0042-4917
I am concerned that FWS is using 1998 as a baseline, as this is before the WBP epidemic. Grizzly numbers may have been rising and the ecosystem able to support a growing population in 1998, however the GYE now has many stressors that were not as prevalent as in 1998. Climate change, blister rust, and pine beetles have decimated WBP populations. In the previous proposal of the 2007 delisting of grizzlies, WBP was stated as one of four important food sources. FWS lost its appeal in the Ninth Circuit Court in 2011 because the Service was found to be arbitrary and capricious in its consideration of grizzlies' use of WBP. In the current proposal, FWS merely claims WBP to be an important food source, and the research used to support this claim is not comprehensive in consideration to climate change and epidemics, making the argument once again arbitrary and capricious. The current rule glosses over and deemphasizes the role WBP has in a GYE grizzly's diet to serve as a base for delisting. The Service's research found grizzly bears' selection of WBP seeds has declined since 2000, coinciding with WBP population declines reaching epidemic proportions, but the agency fails to acknowledge the likely causal connection of stark and rapid declines of WBP populations being a limiting factor for grizzly bears using it as a food source. The proposal states one-third of grizzly bears do not have WBP in their home range, but does not elaborate to clarify if a lack of WBP is because WBP does not grow in those regions or if those populations have been decimated by beetles and blister rust, therefore removing that vital food source from the bear's diet. The studies conducted are vastly insufficient in duration to determine the effects of climate change, reduced viable habitat, dwindling food sources, and how these stressors affect grizzly populations. The FWS is hasty, unreasonable, and offers dubious scientific results as evidence in favor of delisting. The Service is also relying on the ability to re-emergency relist grizzlies if	Population Parameters	Please see attachment. Attachments FWS comment	FWS-R6-ES-2016-0042-4891

I am also concerned given how slowly grizzly bears reproduce, and the inexact science with regards to counting their population.	Population parameters	I am writing to respectfully share my opposition to the proposal to delist grizzlies in the Greater Yellowstone Ecosystem. I submit my comments as someone who takes an annual back country trip to another grizzly habitat, Glacier National Park in Montana, and who over the years has developed a deep appreciation for grizzlies. I also have a deep appreciation for the fact that, while generally calm, when feeling that they/their young may be threatened, they can pose a life threatening danger to hikers/backpackers or others. Given recent decreases in their food sources, and more bears wandering further in search of sustenance, I can anticipate that many of the bears in the Yellowstone system will wander at times outside of the park's boundaries. I have concern that any sport hunting which might be allowed by states after delisting (and which are already rumored to be in the works) would not only threaten the grizzly population, but could also increase the potential for conflict/threat between grizzlies and non-consumptive wildlife users, such as hikers/backpackers. If a bear were to survive or witness an encounter with a sport hunter, I worry that that bear would be more prone to perceive other humans as a threat, and therefore put people at greater risk as well. I am also concerned given how slowly grizzly bears reproduce, and the inexact science with regards to counting their population. Last year in Florida's first black bear hunt, quotas were exceeded over the first weekend of the hunt. If quotas for a grizzly hunt were accidentally exceeded, the time to rebuild the population could be significant. And from my observation with the limited sport hunting allowed of wolves, both here in my home state of Minnesota, and out west, once sport hunting starts, the appetite for it increases- regardless of if animal population numbers "support" continued hunts or not. If the FWS allows for the hunting of grizzlies, I think we need to be prepared for there to be more pressure for grizzlies to be hunted, whether or not the science would support that as a possible alternative at any given time. I also want to note the recent meta-analysis of the impact of hunting keystone predators upon their ability to best perform their vital ecological functioning, and that the environmental detriment is not simply a function of the number of animals left on the landscape, but also of the ways their behaviors are influenced by being subject to hunts (Ripple, et.al., Bioscience, 2009). In closing, I would like to add one additional matter. The USFWS says that it wants to work with Native American groups on this proposal. Over fifty native american groups have already shared that they are opposed to this delisting. Please listen to the voices of Native Americans, myriad scientists, and many many other Americans, and do not move forward with the delisting of grizzlies at this time. Thank you for your time and attention.	FWS-R6-ES-2016-0042-4930
Yellowstone grizzlies are isolated from other populations yet the proposed rule does not sufficiently address this. Rather, USFWS improperly relies on non-binding "assurances" from Montana to "limit mortality" in potential linkage zones. How is this enough? The plan should be revised to offer additional avenues to connect Yellowstone's population with grizzlies in the north, thereby ensuring longterm survival of the species. Further, the proposed rule improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001).	Population Parameters	I oppose delisting of Greater Yellowstone Ecosystem grizzly bears. First, the proposed rule fails to adequately protect habitat outside of the Primary Conservation Area (PCA). Why? As many as half of Yellowstone's grizzly bears spend time outside of the PCA. Rather, the proposed rule should require continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. Next, Yellowstone grizzlies are isolated from other populations yet the proposed rule does not sufficiently address this. Rather, USFWS improperly relies on non-binding "assurances" from Montana to "limit mortality" in potential linkage zones. How is this enough? The plan should be revised to offer additional avenues to connect Yellowstone's population with grizzlies in the north, thereby ensuring longterm survival of the species. Further, the proposed rule improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). Finally, what is the rush? With so many unknowns (stagnant population, changing climate, depleted food sources), why not delay this proposal for 5 years. It feels premature and insufficient.	FWS-R6-ES-2016-0042-4949

Additionally, the Grizzly population is likely to suffer severe reductions in their population if the proposed removal from the Federal List of Endangered and Threatened Wildlife is approved due to trophy hunts in Wyoming, Montana, and Idaho. I understand from available information that these trophy hunts are likely to begin within one year of "removal". If sport hunting and other causes of mortality exceed the number of cubs born each year, the Grizzly's numbers could be reduced within a very short amount of time.	Population Parameters	I am very concerned about the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. According to Mr. Doug Peacock, an expert on the Greater Yellowstone Grizzly Bears, evidence indicates that the Grizzly population is already being impacted by climate change in so much as reducing one of its major food sources, e.g. the Whitebark Pine tree to near extinction in the last 10 years. It remains to be seen the overall effect, but at one time, the nuts from the Whitebark Pine, a species of pine that grew abundantly at higher elevations, provided an especially valuable food source for mother bears with the added advantage that vulnerable mother bears and their young tended to stay at these higher, more remote and therefore safer locations, where the trees grew. Due to the near extinction of the Whitebark Pine, the safety that accompanied this food source no longer exists. Additionally, the Grizzly population is likely to suffer severe reductions in their population if the proposed removal from the Federal List of Endangered and Threatened Wildlife is approved due to trophy hunts in Wyoming, Montana, and Idaho. I understand from available information that these trophy hunts are likely to begin within one year of "removal". If sport hunting and other causes of mortality exceed the number of cubs born each year, the Grizzly's numbers could be reduced within a very short amount of time. I believe strongly in the protection afforded the Greater Yellowstone Grizzly Bears under the Endangered Species Act as the best means to ensure that this population of bears will continue to roam the forests and mountains of the Greater Yellowstone Ecosystem for years to come. I respectfully request that FWS halt the process of removal and begin a thorough study of the effects of climate change on the Grizzly Bear in the present as well as in the future prior to making its decision.	FWS-R6-ES-2016-0042-5486
Current efforts to recover the population of the GYE bears need to continue. Maintenance or even growth of that population should be the primary goal. Grizzly bear populations are an important part of our nation's shared natural heritage. I urge you to reject delisting.	Population parameters	Cynthia Guerra, May 2016 Comments regarding FWS Docket ID: FWS-R6-ES-2016-0042: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife It has been suggested that current management actions have led to an increase in numbers of grizzly bears in the Greater Yellowstone Ecosystem (GYE). But the published Proposed Rule Document (PRD) and supporting reports state that grizzly bears remain "a "conservation-reliant" species because of their low resiliency to excessive human-caused mortality." Therefore, continuation of current management practices is required to help assure a healthy population of the species in the future. It is stated that bear numbers have increased in the core recovery area, but the underlying assumptions to these statements may be inherently flawed rendering these numbers inaccurate. If the assumptions in the PRD and supporting reports do not hold true in the future, grizzly populations may be adversely impacted. The prudent approach now is to maintain their current listing status. Therefore, I oppose delisting of GYE grizzly bears under management conditions as described in the current FWS PRD and Conservation Strategy. Uncertainties about bear demographics and increasing human activity (including hunting) require a more conservative approach than outlined in the PRD. Established recovery strategies and criteria should be retained or even strengthened, with continuing effort to reduce human activity that either damages habitat or invites the greatest risk of human-bear conflict which leads to bear mortality. The PRD does not demonstrate adequately that the scientific modeling or the underling assumptions to population statistics are robust and will result in appropriate management measures to ensure the success of the GYE grizzly population. I am distressed that FWS expresses confidence in predicting how many "extra" female and male bears that each year will be available for trophy hunting. Some of these annual predictions are very low numbers (less than 5). It is unfathomable that a natural resource agency would ever declare any number of bears less than 5 as "extra" and appropriate for trophy hunting. Given the uncertainty, there should be no "discretionary" bear mortality within the PCA. Current efforts to recover the population of the GYE bears need to continue. Maintenance or even growth of that population should be the primary goal. Grizzly bear populations are an important part of our nation's shared natural heritage. I urge you to reject delisting.	FWS-R6-ES-2016-0042-5529

Politics vs ScienceIt appears as though current grizzly bear population estimates in the GYE are made with political expediency in mind. For example, Idaho Fish and Game claim the GYE grizzly population exceeds 1,000 bears while the USFWS claims about 760 bears currently reside in the GYE. This amounts to a 24% disparity between agencies. This , of course, does not meet scientific scrutiny .	Population Parameters	I oppose the delisting of ursus arctos horribilis in the GYE ecosystem by the USFWS for some of the following reasons: 1. Politics vs Science It appears as though current grizzly bear population estimates in the GYE are made with political expediency in mind. For example, Idaho Fish and Game claim the GYE grizzly population exceeds 1,000 bears while the USFWS claims about 760 bears currently reside in the GYE. This amounts to a 24% disparity between agencies. This , of course, does not meet scientific scrutiny . 2. I would like to see cross scientific methods used to establish the current population in the GYE in order to improve the accuracy of the count. Use a DNA rub study in conjunction with radio collaring , field observation and spatial habitat modeling and analysis as was done in the NCDE recently. I know that there were overtures made to the IGBST to conduct a DNA rub analysis in the GYE a few years back which was meant with vehement resistance. 3. Historically, the states of Wyoming, Montana and especially Idaho have done a very poor job in protecting this iconic species. Before the ESA was enacted and implemented in 1974 , the grizzly bear population in the GYE was under 200 and certainly headed towards extirpation without the timely intervention and sound recovery plan of the USFWS. If delisting occurs, what's to prevent the states involved from botching the current success achieved by the federal agency. 4. Knowing that the grizzly has one of the lowest reproductive rates and a cub of the year mortality rate of 50% , there is very little room for error. 5. Why can't the USFWS place more resources towards colonization by grizzlies into all suitable habitat within the GYE, primarily working on reducing human-bear conflicts in areas where bears have not existed for the past 50+ years? Again, I would delay delisting until a viable population is established in the Bitterroot-Selway ecosystem in west central Idaho either through natural immigration or translocation.	FWS-R6-ES-2016-0042-5574
As we know grizzly bears have such a slow reproduction rate, that if this proposed removal of protection does in fact crash the population they may or may not be able to recover as they did once before. Especially taking into consideration the habitat loss outside the park, increased development and mining, fracking, road building, all of these may not provide the needed habitat that once helped the bears recover. To make a decision based on these facts is premature. Why the rush to a decision when the facts are gray at the least.	Population parameters	'Please reconsider your decision of delisting the GYE grizzly bear. Some of the key ideas that need to be reviewed include 1)the population count uncertainties, 2)the ever-changing climate and the affects on key food sources like white bark pine and army cutworm moths, 3)the decline of westslope and yellowstone cutthroat trout (another key food source) due to the nonnative fish introduced into Yellowstone, 4)the future elk population uncertainty as more calves are being consumed by bears to replace other depleted food sources, long term drought and declining snowpack nurturing vegetation and a continued hunting economy outside park borders, 5)the conditioned behavior of grizzly bears to humans under protection which will allow their population to drastically decline once the protection is removed. A)Prior to the recent proposal of delisting the GYE grizzly, the park officials including bear biologists were unable to put a finite number on the grizzly bears. How could they possibly get a definitive number on an 18 million acre area especially when male bears are able to sustain a 1000 square mile roaming territory? We were always told 'around 300-600' for years and years and about the same for black bears (which populations haven't been studied recently at all). All of a sudden there is a definitive number being thrown out there which coincidentally corresponds with the proposed delisting. More research needs to be done to ensure this number is in fact accurate. As we know grizzly bears have such a slow reproduction rate, that if this proposed removal of protection does in fact crash the population they may or may not be able to recover as they did once before. Especially taking into consideration the habitat loss outside the park, increased development and mining, fracking, road building, all of these may not provide the needed habitat that once helped the bears recover. To make a decision based on these facts is premature. Why the rush to a decision when the facts are gray at the least. B)Yes bears have a very diverse diet and can somewhat adapt to the changing environment, it is known that NO food source can replace the caloric content of the white bark pine who are functionally extinct in some areas and with the current trend of future warming climates at high altitudes, this will most likely not allow the white bark pines to make a comeback. Army cutworm moths (another key food source) may not be a dependable food source either, as pesticides affect them in the fields of Kansas and the upper altitude environments may not be suitable in the future with warming temperatures. C)Elk calves have increasingly been consumed by bears in the early summer months, which while great for the bears does add to the overall uncertainty of this key food source as well. Long term drought and natural wolf predation has brought the population into a range of equilibrium, but with the sustained aggressive hunting economy outside the park, the declining snowpack that may not provide as nurturing of vegetation, and the bears themselves increasing predation, the future of yet another key food source is uncertain. D) The bears of Yellowstone and the GYE have learned cohabitation with humans, and those that have not are not here anymore. They get used to humans, learn to avoid them, or turn them into 'white noise' which allows them to feed in the front country in front of the millions of awed and inspired tourists that come to Yellowstone and the National Forests each year. Once protection is removed, there will be a drastic decline in the population as the bears learn their hard lessons as they simply try to replace their undependable natural food resources and turn to other sources such as trash, bird feeders, gardens and livestock. As we know their slow reproduction ways may not be viable enough to sustain the population if a crash does in fact occur. Add to that the increased pressure on the surrounding land outside Yellowstone with rapid development, and as protection is removed the land will be exploited with mining, fracking, road building all which will ensure the bear's demise. Throw in state management plans of trophy hunting and the bears may not have a chance at all outside the park. Please take all these points into consideration as you review the upcoming delisting of the grizzly bear. The value of what the bear means to us, those of us who are in touch with the wild that is, can not even be measured. There is no weight or price when it comes to measuring a true icon of the wild. Our planet has lost so much of its wildness, lets not add another KEY CHARACTER. Let the Great Spirit of the Bear continue to thrive. E) My family visited Yellowstone last year and were in awe at the sight of the animals. We were fortunate enough to see one of these magnificent animals. Don't take away the dream of thousands to see these great creatures.	FWS-R6-ES-2016-0042-5566

IT IS UNJUSTIFIED TO DELIST THE GRIZZLIES because they are not recovered. While USFWS claims that there are 700 grizzly bears in the Greater Yellowstone Ecosystem, this is a contested figure. Grizzly bears have not recovered across a significant portion of their range and should not be delisted.	Population parameters	I strongly oppose removing the Greater Yellowstone Grizzly bears from the protections afforded under the Endangered Species Act! That such a notion is even being contemplated is shocking. According to the best scientific evidence available, any plan to delist the Grizzlies is unjustified, reckless, and unconscionable. IT IS UNJUSTIFIED TO DELIST THE GRIZZLIES because they are not recovered. While USFWS claims that there are 700 grizzly bears in the Greater Yellowstone Ecosystem, this is a contested figure. Grizzly bears have not recovered across a significant portion of their range and should not be delisted. IT IS RECKLESS TO DELIST THE GRIZZLIES because their survival is precarious, at best, due to continued habitat encroachment, loss of key foods, increased mortality rates and low rate of reproduction. IT IS UNCONSCIONABLE TO DELIST THE GRIZZLIES because lifting the federal protections will allow state-sponsored trophy hunting. USFWS, as Guardians of the Greater Yellowstone Grizzlies, you have a fiduciary responsibility to protect these bears. Please do not betray that trust by delisting them from the Endangered Species Act.	FWS-R6-ES-2016-0042-5627
Historically, the states of Wyoming, Montana and especially Idaho have done a very poor job in protecting this iconic species. Before the ESA was enacted and implemented in 1974 , the grizzly bear population in the GYE was under 200 and certainly headed towards extirpation without the timely intervention and sound recovery plan of the USFWS. If delisting occurs, what's to prevent the states involved from botching the current success achieved by the federal agency.	Population parameters	I oppose the delisting of ursus arctos horribilis in the GYE ecosystem by the USFWS for some of the following reasons: 1. Politics vs Science It appears as though current grizzly bear population estimates in the GYE are made with political expediency in mind. For example, Idaho Fish and Game claim the GYE grizzly population exceeds 1,000 bears while the USFWS claims about 760 bears currently reside in the GYE. This amounts to a 24% disparity between agencies. This , of course, does not meet scientific scrutiny . 2. I would like to see cross scientific methods used to establish the current population in the GYE in order to improve the accuracy of the count. Use a DNA rub study in conjunction with radio collaring , field observation and spatial habitat modeling and analysis as was done in the NCDE recently. I know that there were overtures made to the IGBST to conduct a DNA rub analysis in the GYE a few years back which was meant with vehement resistance. 3. Historically, the states of Wyoming, Montana and especially Idaho have done a very poor job in protecting this iconic species. Before the ESA was enacted and implemented in 1974 , the grizzly bear population in the GYE was under 200 and certainly headed towards extirpation without the timely intervention and sound recovery plan of the USFWS. If delisting occurs, what's to prevent the states involved from botching the current success achieved by the federal agency. 4. Knowing that the grizzly has one of the lowest reproductive rates and a cub of the year mortality rate of 50% , there is very little room for error. 5. Why can't the USFWS place more resources towards colonization by grizzlies into all suitable habitat within the GYE, primarily working on reducing human-bear conflicts in areas where bears have not existed for the past 50+ years? Again, I would delay delisting until a viable population is established in the Bitterroot-Selway ecosystem in west central Idaho either through natural immigration or translocation.	FWS-R6-ES-2016-0042-5574

Knowing that the grizzly has one of the lowest reproductive rates and a cub of the year mortality rate of 50% , there is very little room for error.	Population parameters	I oppose the delisting of ursus arctos horribilis in the GYE ecosystem by the USFWS for some of the following reasons: 1. Politics vs Science It appears as though current grizzly bear population estimates in the GYE are made with political expediency in mind. For example, Idaho Fish and Game claim the GYE grizzly population exceeds 1,000 bears while the USFWS claims about 760 bears currently reside in the GYE. This amounts to a 24% disparity between agencies. This , of course, does not meet scientific scrutiny . 2. I would like to see cross scientific methods used to establish the current population in the GYE in order to improve the accuracy of the count. Use a DNA rub study in conjunction with radio collaring , field observation and spatial habitat modeling and analysis as was done in the NCDE recently. I know that there were overtures made to the IGBST to conduct a DNA rub analysis in the GYE a few years back which was meant with vehement resistance. 3. Historically, the states of Wyoming, Montana and especially Idaho have done a very poor job in protecting this iconic species. Before the ESA was enacted and implemented in 1974 , the grizzly bear population in the GYE was under 200 and certainly headed towards extirpation without the timely intervention and sound recovery plan of the USFWS. If delisting occurs, what's to prevent the states involved from botching the current success achieved by the federal agency. 4. Knowing that the grizzly has one of the lowest reproductive rates and a cub of the year mortality rate of 50% , there is very little room for error. 5. Why can't the USFWS place more resources towards colonization by grizzlies into all suitable habitat within the GYE, primarily working on reducing human-bear conflicts in areas where bears have not existed for the past 50+ years? Again, I would delay delisting until a viable population is established in the Bitterroot-Selway ecosystem in west central Idaho either through natural immigration or translocation.	FWS-R6-ES-2016-0042-5574
Yellowstone's grizzly bear population is NOT recovered: It is completely isolated from other grizzly bear populations and very far from the 2000+ animals considered necessary for long-term viability; it's also only 2% of the 100,000 grizzly bears that once roamed the U.S. (in a range 100 times larger!)	Population parameters	I submit comments as a biologist and wildlife conservationist. Given the severity of threats facing Yellowstone's grizzly bears, I strongly urge you to NOT delist the population, renew sport hunting, and/or lessen habitat protections. The reasons to not delist follow. - Yellowstone's grizzly bear population is NOT recovered: It is completely isolated from other grizzly bear populations and very far from the 2000+ animals considered necessary for long-term viability; it's also only 2% of the 100,000 grizzly bears that once roamed the U.S. (in a range 100 times larger!). This magnificent animal's imperilment comes from too many people collectively causing permanent habitat degradation and fragmentation (such as increasing human infrastructure, energy development, problematic livestock husbandry practices, climate change, poor state management, persecution, and questionable methods of monitoring the grizzly's status). - Yellowstone's grizzly bears have lost critically important forage that previously had positive effects on their reproductive success. Since the early 2000s much of their food resources are depleted due to recently introduced non-native lake trout, a white pine fungal disease, a climate-driven outbreak of bark beetles, and a loss of army cutworm moth that are severely threatened by warming. There is no doubt that food resources of Yellowstone's grizzly bears have declined and put the population at grave risk, and more is on its way. - Grizzly bears have one of the lowest reproductive rates of any land mammal, and most cubs die before adulthood. The species also has difficulty colonizing new habitats, mainly because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates and can more easily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover! - State wildlife management agencies bend over backwards for "sport" hunters interested in killing wildlife, who view carnivores as competitors. Hunting accounts for 70-80% of all deaths of adult carnivores in the West. The public trust doctrine is often invoked by state wildlife agencies, but much abused in actual practice in a system that marginalizes and excludes stakeholders who value large carnivores intrinsically or for contributions to ecosystem health. Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals. - Counting grizzlies in Yellowstone's wilderness is difficult, and the indirect indicators used by USFWS are unreliable and generate false results that increase the likelihood that the USFWS will inaccurately conclude that the population has grown, when, in truth, it has declined due to excessive numbers of deaths. Claims by the USFWS that the Yellowstone grizzly has grown at a high rate for several decades are NOT proven. Although some growth may have occurred, it is likely modest, and population decline is probably occurring NOW as a result of deteriorating habitat conditions. New methods being introduced by the USFWS are billed as an improvement, but will actually increase the risk of over-killing bears and mistakenly conclude that observed levels of death are "sustainable". A bad situation will almost certainly worsen if Yellowstone's grizzlies are delisted and resources are not available to maintain current levels of monitoring. - The Yellowstone grizzly population has benefited from, and will continue to benefit from ESA protection. The current population would not be nearly as numerous or as widely distributed without it. The ESA has protected habitat on public lands by requiring land managers consult with the USFWS to insure their actions do not harm grizzly bears or their habitat, and it needs to stay that way! The ESA listing also stopped sport hunting of grizzly bears, closed garbage dumps and cleaned other human attractants, reduced the numbers of domestic sheep grazing in grizzly bear habitat, prohibited and penalized the harassment and poaching of grizzlies, resulted in increased research that has led to improved management, and provided essential funding for measures to reduce conflicts between bears and people. If delisting were to occur, the bears would lose: Land managers would poorly manage to grizzlies, unnecessary sport hunting would be renewed, the mandate to eliminate human attractants would lessen, there would be little imperative to remove hazards associated with sheep grazing, penalties for harassment and poaching would be greatly lessened, and funding to reduce conflicts and hazards would be harder to secure. Please continue to protect the Yellowstone Grizzly bears under the ESA.	FWS-R6-ES-2016-0042-5647

Grizzly bears have one of the lowest reproductive rates of any land mammal, and most cubs die before adulthood. The species also has difficulty colonizing new habitats, mainly because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates and can more easily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover!	Population parameters	I submit comments as a biologist and wildlife conservationist. Given the severity of threats facing Yellowstone's grizzly bears, I strongly urge you to NOT delist the population, renew sport hunting, and/or lessen habitat protections. The reasons to not delist follow. - Yellowstone's grizzly bear population is NOT recovered: It is completely isolated from other grizzly bear populations and very far from the 2000+ animals considered necessary for long-term viability; it's also only 2% of the 100,000 grizzly bears that once roamed the U.S. (in a range 100 times larger!). This magnificent animal's imperilment comes from too many people collectively causing permanent habitat degradation and fragmentation (such as increasing human infrastructure, energy development, problematic livestock husbandry practices, climate change, poor state management, persecution, and questionable methods of monitoring the grizzly's status). - Yellowstone's grizzly bears have lost critically important forage that previously had positive effects on their reproductive success. Since the early 2000s much of their food resources are depleted due to recently introduced non-native lake trout, a white pine fungal disease, a climate-driven outbreak of bark beetles, and a loss of army cutworm moth that are severely threatened by warming. There is no doubt that food resources of Yellowstone's grizzly bears have declined and put the population at grave risk, and more is on its way. - Grizzly bears have one of the lowest reproductive rates of any land mammal, and most cubs die before adulthood. The species also has difficulty colonizing new habitats, mainly because female grizzlies tend to stay in or near their mother's range. This lack of resilience contrasts with that of wolves and mountain lions, which reproduce at higher rates and can more easily colonize areas hundreds of miles away. Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover! - State wildlife management agencies bend over backwards for "sport" hunters interested in killing wildlife, who view carnivores as competitors. Hunting accounts for 70-80% of all deaths of adult carnivores in the West. The public trust doctrine is often invoked by state wildlife agencies, but much abused in actual practice in a system that marginalizes and excludes stakeholders who value large carnivores intrinsically or for contributions to ecosystem health. Over time, states will almost certainly manage grizzly bears in the same ways as they do wolves and mountain lions, which will preclude ever securing connections between ecosystems and reaching larger conservation goals. - Counting grizzlies in Yellowstone's wilderness is difficult, and the indirect indicators used by USFWS are unreliable and generate false results that increase the likelihood that the USFWS will inaccurately conclude that the population has grown, when, in truth, it has declined due to excessive numbers of deaths. Claims by the USFWS that the Yellowstone grizzly has grown at a high rate for several decades are NOT proven. Although some growth may have occurred, it is likely modest, and population decline is probably occurring NOW as a result of deteriorating habitat conditions. New methods being introduced by the USFWS are billed as an improvement, but will actually increase the risk of over-killing bears and mistakenly conclude that observed levels of death are "sustainable". A bad situation will almost certainly worsen if Yellowstone's grizzlies are delisted and resources are not available to maintain current levels of monitoring. - The Yellowstone grizzly population has benefited from, and will continue to benefit from ESA protection. The current population would not be nearly as numerous or as widely distributed without it. The ESA has protected habitat on public lands by requiring land managers consult with the USFWS to insure their actions do not harm grizzly bears or their habitat, and it needs to stay that way! The ESA listing also stopped sport hunting of grizzly bears, closed garbage dumps and cleaned other human attractants, reduced the numbers of domestic sheep grazing in grizzly bear habitat, prohibited and penalized the harassment and poaching of grizzlies, resulted in increased research that has led to improved management, and provided essential funding for measures to reduce conflicts between bears and people. If delisting were to occur, the bears would lose: Land managers would poorly manage to grizzlies, unnecessary sport hunting would be renewed, the mandate to eliminate human attractants would lessen, there would be little imperative to remove hazards associated with sheep grazing, penalties for harassment and poaching would be greatly lessened, and funding to reduce conflicts and hazards would be harder to secure. Please continue to protect the Yellowstone Grizzly bears under the ESA.	FWS-R6-ES-2016-0042-5647
Grizzly bears are already dying in record numbers. In 2015 alone, a record 59 grizzlies were known to have died in the ecosystem, the vast majority of which were human caused (killed by hunters, management removals, etc). What is even more concerning is that 2015 is by no means an outlier year. Known and probable mortalities have exceeded 50 bears for 3 out of the last 6 years, often violating the government's own mortality limits. This increased mortality is often spun by USFWS as the natural result of more bears in the population. The problem with this is that the grizzly population has not increased substantially since the early 2000's, according to their own data.	Population Parameters	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive versus on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266

There is scientific uncertainty around the effects of climate change on grizzly bears and their food sources. Connectivity remains a major problem; Yellowstone's grizzlies are isolated from their kin in Glacier, a few hundred miles to the north. Moreover, it is likely the GYE population is no longer growing and most likely declining. The GYE population, along with grizzlies to the north, only represent a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the contiguous U.S. In a range that was formerly 100 times larger	Population Parameters	See Attached Attachments Sheehy Pike Lisa	FWS-R6-ES-2016-0042-0522
Grizzlies do not produce as quickly as other species, hunters will kill the young and most likely the sows (mothers). Unlike predators that seek out the weak and sick, "Hunters" will also seek out the best & healthiest specimens to kill and "proudly" display and brag of their murder. They will bait or lure them from the park, either by themselves or with the help of outfitters to kill. The population will be back to endangered status in no time and the very animals such as grizzlies and wolves that people come to see - will once again be extinct. PLEASE for once, listen to what the American people say - NOT the Koch brothers, the oil companies and other big corporate interests!! Do what our founding fathers would have and REPRESENT the American people for once!!	Population Parameters	I oppose delisting the Greater Yellowstone Grizzly population. These majestic animals belong, are needed for a healthy eco-system and deserve our protection on their land!! Grizzlies do not produce as quickly as other species, hunters will kill the young and most likely the sows (mothers). Unlike predators that seek out the weak and sick, "Hunters" will also seek out the best & healthiest specimens to kill and "proudly" display and brag of their murder. They will bait or lure them from the park, either by themselves or with the help of outfitters to kill. The population will be back to endangered status in no time and the very animals such as grizzlies and wolves that people come to see - will once again be extinct. PLEASE for once, listen to what the American people say - NOT the Koch brothers, the oil companies and other big corporate interests!! Do what our founding fathers would have and REPRESENT the American people for once!! DO NOT DELIST Grizzlies. Thank you!!	FWS-R6-ES-2016-0042-1655

When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Å Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. Å In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting: just like FWS is allowing to happen with wolves. The writing is on the wall. Å Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. This approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. The three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. Å Summary: The numbers of bears are not viable within GYE, GYE is an island for genetic diversity, the 3 states have horrible management of predators (has seen with wolves). I am AGAINST the delisting of the grizzly bear . Å	Population Parameters	Thank you for allowing public comment on this Proposed issue: The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Plus, the GYE is an isolated "island" where species diversity is limited because corridor for new genetic are shut down because of human inter mention (i.e. road, ranches, etc) GYE region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. FWS will stay involved with protecting the grizzly population after delisting. In the form of a leaked memo, the 3 states said that they will open up trophy hunting seasons for the bears. I believe that opening such seasons is a prime motivation for the states in pushing for de-listing. If you look at what each state is doing to manage wolves, it is clear that they will only allow the minimum numbers of individuals to survive, nothing more. Relying on state agencies, that have shown a deep hatred towards any predator shall NOT be allowed or given a chance to manage a endangered species. FWS claim that they will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting: just like FWS is allowing to happen with wolves. The writing is on the wall. Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. This approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. The three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. Summary: The numbers of bears are not viable within GYE, GYE is an island for genetic diversity, the 3 states have horrible management of predators (has seen with wolves). I am AGAINST the delisting of the grizzly bear.	FWS-R6-ES-2016-0042-1922
David Mattson also disagrees with the USFWS's contention that the number of bears has reached the [Greater Yellowstone Ecosystem's] carrying capacity. To the contrary, Mr. Mattson argues that carrying capacity has in fact declined. He stated, "because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millenial drought which is promising more of the same to come, that we've seen a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods". He further added, "while we have seen an increase in the distribution of the bear population, probably by 30 to 40% since the early 2000s, at the same time, we haven't seen any increase in the population".	Population Parameters	Biologist: Yellowstone Grizzlies Can't Afford Any Increase In Mortality This was the response David Mattson, a retired bear biologist and ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone gave when asked whether the Yellowstone Grizzly population is big enough that it could sustain any mortality from sport hunting? David Mattson also disagrees with the USFWS's contention that the number of bears has reached the [Greater Yellowstone Ecosystem's] carrying capacity. To the contrary, Mr. Mattson argues that carrying capacity has in fact declined. He stated, "because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millenial drought which is promising more of the same to come, that we've seen a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods". He further added, "while we have seen an increase in the distribution of the bear population, probably by 30 to 40% since the early 2000s, at the same time, we haven't seen any increase in the population". Because the Grizzly population is becoming increasingly vulnerable, and because state wildlife management is such a poor alternative, and in dire need of reform, Mr. Mattson strongly opposes delisting. In light of these statistics, the decision to remove Greater Yellowstone Grizzlies from federal protection under the Endangered Species Act would be disastrous. As a taxpayer, as a frequent visitor to Yellowstone and as a great appreciator of the Grizzly Bears and their impact not only on the environment but our lives, I respectfully ask that you do not delist them.	FWS-R6-ES-2016-0042-2215

At this point, the population is still small enough that they could easily become endangered or extinct if hunting them occurs and any other detrimental environmental effects occur.	Population Parameters	I'll keep this short and sweet...there is no logical reason to remove Grizzly bears from the endangered species list. At this point, the population is still small enough that they could easily become endangered or extinct if hunting them occurs and any other detrimental environmental effects occur. Basically, those wanting to hunt Grizzlies are just looking for their next fix to make themselves feel powerful. Why would anyone delist an animal just for Trophy hunting? There is no benefit to the bears, the ecosystem, or the hunters.	FW5-R6-ES-2016-0042-4072

Trigger Text	Subcode 1	Subcode 2	Code(s)	Full Comment Text	Form Letter/Document ID	Annotation Notes
Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population.	1100		Post-delisting monitoring and management	Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities. Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 -- and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears. - - The plan presents a potentially tremendous setback. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - - Yellowstone's bears have also long been isolated from other bear populations, forcing the government to keep them on permanent life support by proposing to truck in bears to avoid health issues caused by inbreeding. This fact further highlights the need for recovering grizzlies in more places. - - I am asking the Service to maintain protections for Yellowstone grizzly bears. If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts - - .I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed.	1100		Post-delisting monitoring and management	Grizzly bear numbers in the Greater Yellowstone area have improved since the animals were first protected in 1975, but the bears continue to be threatened by isolation from other grizzly populations, loss of key food sources and human-caused mortalities. Overall grizzlies occupy less than 2 percent of their historic range in the lower 48 -- and yet the U.S. Fish and Wildlife Service has proposed to remove protections from Yellowstone's bears. - - The plan presents a potentially tremendous setback. The decline of whitebark pine and cutthroat trout in Yellowstone has prompted bears to eat more meat, such as livestock and gut piles left behind by big-game hunters, resulting in increased conflicts with humans. And drought and climate change are likely to exacerbate these problems. - - Yellowstone's bears have also long been isolated from other bear populations, forcing the government to keep them on permanent life support by proposing to truck in bears to avoid health issues caused by inbreeding. This fact further highlights the need for recovering grizzlies in more places. - - I am asking the Service to maintain protections for Yellowstone grizzly bears. If removed, we know what to expect: Wyoming, Idaho and Montana have already agreed to allow trophy hunts - - .I am writing to urge you to maintain federal protection for grizzly bears in the Greater Yellowstone Ecosystem -- a population our country has been invested in since 1975. Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. As you know, this population also remains severely isolated and states do not have regulations in place to protect bears that could connect with bears in other areas. Instead, those that wander outside an arbitrary boundary are likely to be killed. - - Asking for comments on this proposal is premature because state regulations for bears aren't in place, so it's impossible to determine how bears will be managed once federal protections are removed. Please reconsider this delisting proposal and keep Yellowstone bears on the endangered species list. - - Sincerely,	CBD	
Without some assurance that surrounding states can protect bears that attempt to disperse, should ESA restrictions be lifted, this listing should be maintained	1100		Post-delisting monitoring and management	I am writing to urge you to maintain federal ESA listing for grizzly bears in the Greater Yellowstone Ecosystem (GYE) -- a high-profile population that we as a nation have invested in since 1975. The FWS estimates a GYE grizzly population of about 700 animals, but this is the census size (N). The science of conservation genetics (in which I have some expertise) tell us that the most important number is not N, but rather the "effective population size" (Ne) - basically the number of individuals that successfully reproduce each generation. Depending on the sex ratio and age structure of sexually mature individuals, the number of breeding adults will be LOWER to FAR LOWER than the census size, and in terms of genetic health and long-term viability of a population, THIS IS WHAT COUNTS. (We have learned this the hard way with the Florida Cougar!). Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. - - Despite positive demographic trends since ESA listing of the GYE grizzlies, this population remains severely isolated, which will jeopardize the long-term viability of this population until some connectivity can be established with other populations. Without some assurance that surrounding states can protect bears that attempt to disperse, should ESA restrictions be lifted, this listing should be maintained. Artificially moving GYE bears to other populations (Northern Rockies) and vice-versa may be necessary in the short term, but this amounts to "ecologically baby-sitting" and is not a long term strategy. Corridors must be developed and then maintained long enough to document successful dispersal and reproduction by bears into and out of the GYE, and then delisting would be justified. I hope you will reconsider the delisting proposal and keep the GYE bears protected until they can become part of a larger meta-population group. - - Sincerely,	CBD	

Artificially moving GYE bears to other populations (Northern Rockies) and vice-versa may be necessary in the short term, but this amounts to "ecologically baby-sitting" and is not a long term strategy	1100		Post-delisting monitoring and management	I am writing to urge you to maintain federal ESA listing for grizzly bears in the Greater Yellowstone Ecosystem (GYE) -- a high-profile population that we as a nation have invested in since 1975. The FWS estimates a GYE grizzly population of about 700 animals, but this is the census size (N). The science of conservation genetics (in which I have some expertise) tell us that the most important number is not N, but rather the "effective population size" (Ne) - basically the number of individuals that successfully reproduce each generation. Depending on the sex ratio and age structure of sexually mature individuals, the number of breeding adults will be LOWER to FAR LOWER than the census size, and in terms of genetic health and long-term viability of a population, THIS IS WHAT COUNTS. (We have learned this the hard way with the Florida Cougar!). Human-caused mortality of grizzly bears has been on the rise, and the Yellowstone population has been on the decline as a result. Allowing the surrounding states to manage these bears and permit trophy hunting will add significant pressure to this population. - - Despite positive demographic trends since ESA listing of the GYE grizzlies, this population remains severely isolated, which will jeopardize the long-term viability of this population until some connectivity can be established with other populations. Without some assurance that surrounding states can protect bears that attempt to disperse, should ESA restrictions be lifted, this listing should be maintained. Artificially moving GYE bears to other populations (Northern Rockies) and vice-versa may be necessary in the short term, but this amounts to "ecologically baby-sitting" and is not a long term strategy. Corridors must be developed and then maintained long enough to document successful dispersal and reproduction by bears into and out of the GYE, and then delisting would be justified. I hope you will reconsider the delisting proposal and keep the GYE bears protected until they can become part of a larger meta-population group. - - Sincerely,	CBD	
Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love	1100		Post-delisting monitoring and management	The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope--they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Thank you. Sincerely,	Endangered Species Coalition	
Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting.	1100	1102	Post-delisting monitoring and management	The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope--they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Thank you. Sincerely,	Endangered Species Coalition	
Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting.	1100	1102	Post-delisting monitoring and management	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been an amazing Endangered Species Act success story. However, after reading it today, I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope. They should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears therein. Secondly, please create a delay in the onset of any grizzly bear hunting for several years, post-delisting, to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Especially there, we should definitely treat them as our neighbors, not merely as game animals. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. This should be standard policy in national parks and forests. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. Grizzly bears are an iconic animal in West. I know they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	

Also, please ensure that bear management plans across Wyoming, Montana and Idaho are coordinated and protective of the bears. I've been informed that Wyoming's plan assumes authority on private land inholdings within park boundaries, (in violation of federal law), Montana's isolates bear populations and Idaho's does not place limits on bear deaths	1104		Post-delisting monitoring and management	Please do not delist grizzly bears from the Endangered Species List. Please ensure a coordinated effort across states and between states and the U.S. Fish & Wildlife Service to protect grizzly bears. Please also declare a hunting moratorium if bears are delisted. After working so hard to achieve a robust population of grizzly bears, it seems short-sighted and unnecessary to permit hunting. Also, please ensure that bear management plans across Wyoming, Montana and Idaho are coordinated and protective of the bears. I've been informed that Wyoming's plan assumes authority on private land inholdings within park boundaries, (in violation of federal law), Montana's isolates bear populations and Idaho's does not place limits on bear deaths. This is not smart wildlife management. It is more important to wildlife, and more important to those of us who love living and recreating in the west, to protect grizzly bears. Please protect bear habitat, create connections between bear populations, and coordinate bear management across the region. Thank you for considering my views.	GYC	
Given the lack of Funds for all your Work, in general, where will the dollars come from to Monitor and Police the States?	1102		Post-delisting monitoring and management	Dear Service Please slow this down and consider the State's Plans Positions first! Those must be "in place" or wanton slaying of these great bears is a real possibility. Then....review this once it is assured that the bears are "safe". I am a hunter but these bears are NOT Trophy animals. They are simply too rare. Too easily hunted and killed. They have lost the fear of the human in too many cases. Given the lack of Funds for all your Work, in general, where will the dollars come from to Monitor and Police the States? Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better. Thanks for reading this.	GYC	
Each state would have to cover the costs associated with bear management, including co-existence work to ensure bears and humans can live together .	1102	805	Post-delisting monitoring and management	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and put all the pieces in place so we can know the whole picture. The Service has blown it with this messy, uncoordinated effort. Before the Service takes another step down its delisting road, they need to make sure that all the other pieces are ready and in place. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Montana just released their plan and it is a disaster. Third, the Service needs to make sure the three states' bear management plans are singing together in harmony. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Each state would have to cover the costs associated with bear management, including co-existence work to ensure bears and humans can live together. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	

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First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management.	1100		Post-delisting monitoring and management	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	
Before going any further with the delisting process, please make sure that proper management plans are ready and that the states of Wyoming, Montana, and Idaho have developed coordinated plans to ensure that the bear population stays at appropriate levels. The plans need to provide for the various areas where bears live to be connected so that no part of the bear population is isolated. And the states' management plans should NOT permit hunting, which is prone to abuse.	1100	not under 701; under 906??	Post-delisting monitoring and management	Please accept my comments on the proposed delisting rule. Before going any further with the delisting process, please make sure that proper management plans are ready and that the states of Wyoming, Montana, and Idaho have developed coordinated plans to ensure that the bear population stays at appropriate levels. The plans need to provide for the various areas where bears live to be connected so that no part of the bear population is isolated. And the states' management plans should NOT permit hunting, which is prone to abuse. The grizzlies deserve our best efforts to maintain their habitat, provide an environment in which they can thrive, and protect them from hunters and other negative human influences. Please place a hold on the de-listing until the plans for future management of bear populations are fully ready for efficient and proper implementation, keeping the bears as top priority! .	GYC	

Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population.	1100		Post-delisting monitoring and management	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	
It has come to my attention that the US Fish and Wildlife Service is trying to put in place a proposed rule to de-list Grizzly bears without first ensuring that state Grizzly bear management plans are updated, National forests amend their plans to protect where Grizzlies live, and the Bureau of Land Management has a plan for protecting Grizzly habitat on our public lands.	1100		Post-delisting monitoring and management	It has come to my attention that the US Fish and Wildlife Service is trying to put in place a proposed rule to de-list Grizzly bears without first ensuring that state Grizzly bear management plans are updated, National forests amend their plans to protect where Grizzlies live, and the Bureau of Land Management has a plan for protecting Grizzly habitat on our public lands. The management term for such a plan would be "ass-backward". (Seriously! Look it up.) It would be much easier for me to understand the rationale for de-listing Grizzlies if I understood the FULL ramifications of that de-listing, rather than getting information piecemeal, as it's being put together. Please reconsider your approach to de-listing Grizzlies. If nothing else, the Service needs to declare a hunting moratorium BEFORE Grizzlies are de-listed. Three states (Idaho, Montana, and Wyoming) are planning to hunt bears once they're delisted. What is the purpose of hunting bears in this day and age? At the very very least, I'd like the Service needs to make sure that Idaho, Montana and Wyoming's bear management plans are consistent with each other. Currently, Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law; Montana's plan doesn't commit to allowing separate bear populations to connect with each other; and Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. I hope you change the proposed plan for the better.	GYC	
Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities.	1100		Post-delisting monitoring and management	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	

Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved.	1100		Post-delisting monitoring and management	Please accept my comments on the proposed delisting rule. First, put the proposed rule on hold and ensure that all Federal and state departments put their plans in place for the bear management. State grizzly bear management plans need to be updated. National forests need to amend their plans to protect the places where bears live. And the Service should tell us how grizzly habitat will be protected on our public lands managed by Bureau of Land Management. Second, the Service needs to declare a hunting moratorium if bears are delisted. The three states -- Idaho, Montana, and Wyoming -- are planning to hunt bears once they're delisted. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. Third, the Service needs to make sure the three states' bear management plans are consistent with one another. Right now those plans are badly out of tune, and sometimes are just plain bad. Wyoming wants to assume authority on private land inholdings within park boundaries, in violation of federal law. Montana's plan doesn't commit to allowing separate bear populations to connect with each other. Idaho's plan makes no mention of how many bear deaths they'd allow while still managing a stable population. Fourth, show us the money. Your plans need to identify the funding to pay for maintaining a healthy grizzly bear population. Here's my bottom line: Bears need the humans in charge to do the following if bears are to thrive: - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. - Reduce conflicts and maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other alphabet-soup agencies involved. The Service needs to promise all of us who care about the great bear that they will do these things. Please change the proposed plan for the better.	GYC	
Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other agencies involved. Many volunteers and local groups are ready, willing, and able to help.	1100		Post-delisting monitoring and management	Please accept my comments on the proposed delisting rule. I oppose grizzly bear hunting. Grizzly bears are majestic, awe-inspiring symbols of the wild, not trophies. Bears are worth more alive than dead. The country's grizzly bears are almost all habituated to humans, with most willing to co-exist and not harm us. They normally do not see people as food or as harmful. Hunting them is taking unfair advantage and needlessly killing creatures that we can live in harmony with. When a bear becomes a danger to people or animals, then it can be removed from the population. Include a campaign to change people's attitudes first. Protect core habitat. There needs to be a corridor from Yellowstone to the Yukon (the Y to Y project). Please support that so that the grizzly population can become self sustaining, with or without people, with or without special protections, as part of a natural ecosystem. They need to be able to travel to find food and other non-related bears. - Protect core habitat. Grizzly bears reproduce more slowly than any other animal in the ecosystem, and they need more vast, undeveloped habitat than any other animal. I want to see meaningful and enforceable habitat protections, including limits on development and road densities. -Maintain stable numbers of bears. No one should set arbitrary reductions on numbers of bears, and the Service has to set strict limits on bear deaths caused by humans. Maintaining a stable population will depend on the grizzly's food supply in a human-free habitat, which is in great fluctuation now. Commit to reducing conflicts. We already lose too many bears to conflicts with humans over food, garbage and livestock. I want the states to commit to reducing conflict between people and bears, and to step up to making it happen. A campaign and bear-proof garbage containers to start. - Create connections between bears, and coordinate bear management across the region. Yellowstone's bears need to connect with other bear groups in the Northern Rockies if they're going to survive in the face of climate change. Greater Yellowstone grizzlies must be managed as just that, Greater Yellowstone Ecosystem bears, not as separate Idaho, Montana, and Wyoming populations. This will take ongoing coordination from the states, tribal governments, the National Park Service, the Forest Service, and all the other agencies involved. Many volunteers and local groups are ready, willing, and able to help. Please change the proposed plan for the better. Show that we have learned how to manage wildlife better over these past years when we didn't do so well. Take the words 'extermination', 'killing', 'removing', and 'reducing the population' out of your dictionary. It's our country too and many of us love to see grizzly bears.	GYC	
The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them.	1100		Post-delisting monitoring and management	I am writing to ask that you do not delist Yellowstone grizzly bears. Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered. Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. It is far, far to early in the bests recovery to delist them. It will be devastating to the fragile Yellowstone Ecosystem. I implore you to rethink this and do not realist the Bears. Thank you for you compassionate consideration.	Humane Society	

A new draft agreement among the three Yellowstone-area states, recently leaked to the press, outlines the states' proposed authority to kill or allow the killing of bears that wander outside the park. Bears that wander even farther, past a "demographic monitoring area" to be set up by the states and the federal agency -- and of course, invisible to both bears and people -- would not count toward the total and could therefore be shot without penalty.	1100		Post-delisting monitoring and management	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. Preserving federal protections for grizzly bears is paramount to species' survival BY GARY CARTER SPECIAL TO THE DAILY CALLAST UPDATED APRIL 1, 2016 Comment 3 In 1805, the explorers Meriwether Lewis and William Clark, making their way across the West, were warned by Native American tribes of grizzly bears' awesome strength. At first, Lewis scoffed at the tribes' advice, writing in his journal that "in the hands of skillful riflemen they are by no means as formidable or dangerous as they have been represented." A few terrifying encounters with the bears, though, changed his mind about that. A little more than a century later, crowds at Yellowstone National Park would gather in delight to watch the bears dine on food scraps. Signs were marked "Lunch Counter ... for Bears Only." Those days are long gone, but crowds still flock to Yellowstone -- nearly 4 million visitors every year -- partly to catch a glimpse of the storied creatures. The grizzly bears that live in and around Yellowstone make up almost half the population in the lower 48 states, and now those bears are at risk. In 2015, their numbers in the Yellowstone area declined by 40, to an estimated 717 from 757 -- a 6 percent drop that represents the highest one-year mortality since grizzlies were given federal protection in 1975. Despite this decline, the U.S. Fish and Wildlife Service is currently preparing to strip the animals of their Endangered Species Act protection. The agency is under pressure from the states around Yellowstone -- Wyoming, Montana and Idaho -- to allow hunting of bears that roam outside the park's boundaries. Now, the proposal to call the bears recovered and remove their protection is imminent. If the rule is finalized, it's likely to allow states to reduce bear numbers by more than 100 practically overnight. But the bears are already struggling, threatened by declines in important foods such as white-bark pine and Yellowstone cutthroat trout, as well as by their isolation from other grizzly populations. Historically, grizzlies ranged from Alaska to Mexico, with at least 50,000 bears living in the western half of the contiguous United States. Today only about 1,500 to 1,700 grizzlies survive outside Alaska, in five isolated populations in the northern Rocky Mountains and the Cascades. Numbers in the Greater Yellowstone area have increased since the animals were first given federal protection, but they continue to be threatened by climate change and food shortages. Over all, grizzly bears still occupy only 2 to 4 percent of their ancient range in the lower 48 states. In June 2014, we filed a "recovery plan petition" asking the Fish and Wildlife Service to recover grizzlies in more of their historic range, including parts of Colorado and Utah; in December, we further petitioned to reintroduce bears into the Selway-Bitterroot Wilderness in Idaho. The Endangered Species Act requires that a species be protected in each "significant portion of its range" -- the law's intent being not only to temporarily stave off extinction, but also to recover species so they can persist into the future. But the service has been systemically ignoring -- indeed actively working to redefine and thus dismantle -- this "significant portion of its range" requirement under both the George W. Bush and Barack Obama administrations. Dozens of native tribes have also been fighting to stop federal removal of protection, asserting it would violate the American Indian Religious Freedom Act. Tribal advocates for grizzlies feel disrespected or disenfranchised by the government's delisting plan. A new draft agreement among the three Yellowstone-area states, recently leaked to the press, outlines the states' proposed authority to kill or allow the killing of bears that wander outside the park. Bears that wander even farther, past a "demographic monitoring area" to be set up by the states and the federal agency -- and of course, invisible to both bears and people -- would not count toward the total and could therefore be shot without penalty. Yet these roaming bears, which may disperse hundreds of miles to mate, are precisely the animals that are needed to convey genetic diversity among populations. If dispersing bears are shot without restraint, chances of the species' survival will be sharply lowered. Keeping federal protections in place is the best way to keep these great beasts alive. When federal protection was stripped from some states' populations of gray wolves, and wolf management was left to those states, wolves there became instant targets, resulting in more than 3,500 wolf killings between 2011 and January 2015. It would be tragic to repeat the same mistake with grizzlies. Gary Carter is a conservationist and resident of South Carolina.	Humane Society Petition	
Montana, Idaho and Wyoming have already proven they are not good stewards towards the great predators.	1100		Post-delisting monitoring and management	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. Montana, Idaho and Wyoming have already proven they are not good stewards towards the great predators. To unlist the grizzly would be their death call.	Humane Society Petition	
All evidence indicates that grizzly bears have benefited from the ESA. Although they are recovering, they still need all the protections possible. Allowing hunting would gravely impact the continued survival of this species. They are a vital part of the Yellowstone ecosystem and provide a balance of all the wildlife in the park.	1100		Post-delisting monitoring and management	All evidence indicates that grizzly bears have benefited from the ESA. Although they are recovering, they still need all the protections possible. Allowing hunting would gravely impact the continued survival of this species. They are a vital part of the Yellowstone ecosystem and provide a balance of all the wildlife in the park. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	
I live in Wyoming, and while the game wardens and the Agency are decent, our political leaders are not. They are in the pockets of the energy companies, of the rich, of the agriculture community (although only god knows why, there's little money there). I strongly urge that all animals in our parks and on federal lands remain under the aegis of the federal government, the Wyoming State government is just not up to the task.	1100		Post-delisting monitoring and management	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. I live in Wyoming, and while the game wardens and the Agency are decent, our political leaders are not. They are in the pockets of the energy companies, of the rich, of the agriculture community (although only god knows why, there's little money there). I strongly urge that all animals in our parks and on federal lands remain under the aegis of the federal government, the Wyoming State government is just not up to the task.	Humane Society Petition	

It is an unfortunate fact that without the vital safety net provided by the Endangered Species Act (ESA), Yellowstone's grizzly bears are likely to be pushed back to the brink of extinction. Here's why: Yellowstone's current population of roughly 650 to 750 grizzly bears is much smaller than the 2000+ animals widely considered by experts to be necessary for long-term viability. Altogether, the five remaining grizzly bear populations in the lower-48 states number perhaps 1500, a mere 1-2% of the 100,000 grizzly bears that once roamed the contiguous U.S. in a range that was formerly 100 times larger. The federal government plans on deliberately perpetuating this precarious situation, even though it means trucking bears into Yellowstone every ten years to deal with genetic problems, and trusting state wildlife management agencies that have notoriously anti-carnivore track records.	1100		Post-delisting monitoring and management	I am very concerned about your agency's proposal to delist Yellowstone grizzly bears and thank you for the opportunity to provide comments on the proposed rule. It is an unfortunate fact that without the vital safety net provided by the Endangered Species Act (ESA), Yellowstone's grizzly bears are likely to be pushed back to the brink of extinction. Here's why: Yellowstone's current population of roughly 650 to 750 grizzly bears is much smaller than the 2000+ animals widely considered by experts to be necessary for long-term viability. Altogether, the five remaining grizzly bear populations in the lower-48 states number perhaps 1500, a mere 1-2% of the 100,000 grizzly bears that once roamed the contiguous U.S. in a range that was formerly 100 times larger. The federal government plans on deliberately perpetuating this precarious situation, even though it means trucking bears into Yellowstone every ten years to deal with genetic problems, and trusting state wildlife management agencies that have notoriously anti-carnivore track records. Entrusting grizzly bear management to the states leaves the rest of us without a democratic voice in ensuring the survival of these magnificent creatures. Moreover, although grizzly populations could be naturally supplemented by maintaining corridors connecting Yellowstone grizzlies with their cousins in Glacier National Park, this option is being foreclosed. Meanwhile, grizzly habitat is shrinking due to growing numbers of hobby ranches, vacation homes, and hunters in pursuit of a grizzly bear trophy. Although bears are demonized for hunting cattle, sheep, and even game, their pine nut and other dietary staples are also being impacted by human damage to the ecosystems that sustain them. I ask that you NOT delist the grizzlies. Moreover, I also ask that you NOT entrust their management and responsibility for stewardship to the states. Doing so would effectively disenfranchise me from a voice in an important part of my--and my children's--national, natural heritage. I further ask that National Park Service managers be assured a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, I ask for measures to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. Please also address the fact that climate disruption is impacting grizzly bears' habitat, food sources and behavior, and take these changes into account when managing for the HEALTH of grizzly bear populations--not their reduction. Thank you again for your consideration.	NPCA	
In particular, I ask for measures to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans.	1100		Post-delisting monitoring and management	I am very concerned about your agency's proposal to delist Yellowstone grizzly bears and thank you for the opportunity to provide comments on the proposed rule. It is an unfortunate fact that without the vital safety net provided by the Endangered Species Act (ESA), Yellowstone's grizzly bears are likely to be pushed back to the brink of extinction. Here's why: Yellowstone's current population of roughly 650 to 750 grizzly bears is much smaller than the 2000+ animals widely considered by experts to be necessary for long-term viability. Altogether, the five remaining grizzly bear populations in the lower-48 states number perhaps 1500, a mere 1-2% of the 100,000 grizzly bears that once roamed the contiguous U.S. in a range that was formerly 100 times larger. The federal government plans on deliberately perpetuating this precarious situation, even though it means trucking bears into Yellowstone every ten years to deal with genetic problems, and trusting state wildlife management agencies that have notoriously anti-carnivore track records. Entrusting grizzly bear management to the states leaves the rest of us without a democratic voice in ensuring the survival of these magnificent creatures. Moreover, although grizzly populations could be naturally supplemented by maintaining corridors connecting Yellowstone grizzlies with their cousins in Glacier National Park, this option is being foreclosed. Meanwhile, grizzly habitat is shrinking due to growing numbers of hobby ranches, vacation homes, and hunters in pursuit of a grizzly bear trophy. Although bears are demonized for hunting cattle, sheep, and even game, their pine nut and other dietary staples are also being impacted by human damage to the ecosystems that sustain them. I ask that you NOT delist the grizzlies. Moreover, I also ask that you NOT entrust their management and responsibility for stewardship to the states. Doing so would effectively disenfranchise me from a voice in an important part of my--and my children's--national, natural heritage. I further ask that National Park Service managers be assured a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, I ask for measures to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. Please also address the fact that climate disruption is impacting grizzly bears' habitat, food sources and behavior, and take these changes into account when managing for the HEALTH of grizzly bear populations--not their reduction. Thank you again for your consideration.	NPCA	
In addition to the excellent points listed below, I would ask you to open your eyes and see what is happening to an animal removed from ESA protection in ID, WY and MT...that is, the grey wolf. That species will be in danger...again...if the protection by ESA is not restored to them. Is that what you want for the grizzly bear???? Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Thanks again for considering my comments.			Post-delisting monitoring and management	In addition to the excellent points listed below, I would ask you to open your eyes and see what is happening to an animal removed from ESA protection in ID, WY and MT...that is, the grey wolf. That species will be in danger...again...if the protection by ESA is not restored to them. Is that what you want for the grizzly bear???? Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Thanks again for considering my comments.	NPCA	

I don't know why Fish and Wildlife thinks opening the bears up to hunting will have a different effect than it did before Endangered Species protection was introduced.	1100		Post-delisting monitoring and management	Mr. Ashe, I don't know why Fish and Wildlife thinks opening the bears up to hunting will have a different effect than it did before Endangered Species protection was introduced. There are at least three times as many people in the US alone that could now shoot them! It would make more sense to introduce them by transport to places in which they are not found in which they could also thrive, such as vast stretches of Canada, Russia, China, and Australia, rather than to allow hunters to start the cycle of violence and slaughter over again. Let's use this opportunity to talk to our fellow caretakers of Earth and all of its living miracles and forge new bonds of cooperation and fellowship on behalf of grizzlies. Perhaps only then can we better cooperate in matters, such as earth warming and the spread of nuclear weapons, that threaten our own species's existence. Please do not allow hunting of bears or any other animal so marginally on the edge of existence! Richard H.K.Bloom Harleysville, Pennsylvania USA 267-500-4315	NPCA	
In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries on park-adjacent lands and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans.	1100		Post-delisting monitoring and management	Take the following steps before finalizing it: Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries on park-adjacent lands and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior and how your proposal takes these changes into account. Provide the public with a clear and detailed plan for how grizzlies will be managed and protected and for how their long term conservation will be assured once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals.	NPCA	
Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas.			Post-delisting monitoring and management	Take the following steps before finalizing it: Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries on park-adjacent lands and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior and how your proposal takes these changes into account. Provide the public with a clear and detailed plan for how grizzlies will be managed and protected and for how their long term conservation will be assured once management is turned over to state wildlife agencies. Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals.	NPCA	
The states can not be trusted to follow USFWS management prescriptions without diligent monitoring and enforcement actions on your agency's part!	1100		Post-delisting monitoring and management	Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. As a Professor Emeritus of Zoology and Environmental Science, I am extremely concerned about your agency's proposed rule and ask that you take the following steps before finalizing it: * Afford National Park Service managers a formal role in the management of bears on habitat adjacent to park borders, and fully address their concerns. In particular, ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors should be strictly prohibited in the proposed plan and the individual state management plans. * Include policies and firm commitments to promote Yellowstone bears naturally connecting to populations in Glacier National Park and other areas. * Clearly articulate how climate change will impact grizzly bears' habitat, food sources and behavior, and how your proposal takes these changes into account. * Provide the public with a clear and detailed plan for how grizzlies will be managed and protected, and for how their long term conservation will be assured, once management is turned over to state wildlife agencies. The states can not be trusted to follow USFWS management prescriptions without diligent monitoring and enforcement actions on your agency's part! Your proposal to remove endangered species protections from Yellowstone and Grand Teton grizzly bears fails to address these critical concerns and must therefore be revised to ensure the long term health and protection of these amazing animals. Thank you for your attention to my comments!	NPCA	
Change the rules to even better protect them. Unfortunately our society is full of those that will kill anything that they want for trophies and bragging rights, photos are not good enough. The USFWS does not have the manpower to control the outcome of delisting. As the populations increase to levels not sustainably have a very expensive raffle, to support the USFWS and let those that need a trophie help support your efforts.	1100		Post-delisting monitoring and management	Don't do it!! Change the rules to even better protect them. Unfortunately our society is full of those that will kill anything that they want for trophies and bragging rights, photos are not good enough. The USFWS does not have the manpower to control the outcome of delisting. As the populations increase to levels not sustainably have a very expensive raffle, to support the USFWS and let those that need a trophie help support your efforts.	WELC	
The grizzly has such a slow reproductive capacity, that this small and fragmented US population MUST remain protected for the foreseeable future, as the few states holding populations cannot be trusted to use science to understand the consequences of their already publicized intents to create a public market for the killing of these important apex predators and scavengers.	1100		Post-delisting monitoring and management	Greater Yellowstone Ecosystem Grizzlies remain isolated from the main population, and delisting with its consequent state public hunting will so further diminish the genetic diversity of that population, that the delisting will effectively slowly extinguish the species. The grizzly still only occupies a very tiny percentage of its historical habitat. Until sufficient subpopulation connectivity is established, and grizzly can naturally disperse into the western US, no delisting is appropriate. State control of predators has proven to be excessively draconian, turning the tiny remnant predator populations of predators not ESA listed into persecuted and very like nonviable over the long-term, unless permanent bans on public hunting can be established. The grizzly has such a slow reproductive capacity, that this small and fragmented US population MUST remain protected for the foreseeable future, as the few states holding populations cannot be trusted to use science to understand the consequences of their already publicized intents to create a public market for the killing of these important apex predators and scavengers.	WELC	

The proposed rule leaves Greater Yellowstone grizzlies in the crosshairs, as states have made clear their plans to reduce the population, including through trophy hunts. Management of grizzly bears outside of the national parks would be left completely up to the states, which have historically been hostile to bears and other large carnivores. The current proposal would allow states to exceed maximum bear deaths for years before any review, allowing for potentially irreversible damage, and would allow complete eradication of bears in some areas. The loss of female grizzlies to trophy hunters who will not be able to tell the difference between a male and female bear could cause a steep, quick decline before emergency action can be taken.	1100		Post-delisting monitoring and management	I am writing to urge you to postpone delisting of the Yellowstone grizzly bear population. The proposal to remove Yellowstone grizzly bears from the endangered species list fails to preserve the progress made toward bear recovery. In fact, it will reverse it. The Greater Yellowstone grizzly bear is one of the United States' most iconic species. Held sacred by native communities for thousands of years in the west, the majestic grizzly has become a treasured symbol of our wild heritage. Visitors spend millions of dollars in the region every year, a vital part of many local economies, in the hopes of spotting a magnificent grizzly. The loss of the grizzly would be a loss for the entire region, and a disservice to the wildlife professionals, dedicated conservationists and wildlife advocates who have fought to save them. While grizzlies have made a comeback, their recovery is still a delicate and uncertain effort. Grizzly bears occupy less than 2% of their historic range in the lower 48 and reproduce very slowly, at a rate of only 1-2 cubs every few years. In the Yellowstone region, the growth of the population has stalled since the early 2000s, and there was a 6% decline last year. The proposed rule leaves Greater Yellowstone grizzlies in the crosshairs, as states have made clear their plans to reduce the population, including through trophy hunts. Management of grizzly bears outside of the national parks would be left completely up to the states, which have historically been hostile to bears and other large carnivores. The current proposal would allow states to exceed maximum bear deaths for years before any review, allowing for potentially irreversible damage, and would allow complete eradication of bears in some areas. The loss of female grizzlies to trophy hunters who will not be able to tell the difference between a male and female bear could cause a steep, quick decline before emergency action can be taken. Additionally, the Yellowstone grizzly population remains isolated; further limiting their range and numbers could prevent them from ever connecting to other grizzly populations. People and bears can coexist. We should not let bears slide back towards extinction because of misplaced political hostility towards these magnificent and beloved creatures. The end result of this proposal will be fewer bears limited to less land and with access to fewer resources necessary for survival. For too long, human beings have assumed animals are non-sentient, unintelligent and, therefore, ours to disrespect and exploit as we will. Today, often new research is published that denies humankind's previously arrogant assumptions about other species, and our lack of respect and care must change. Money and politics should not have the weight that they do on what is essentially an ethical question.	WELC	
I can see delisting species (or not adding them to the list) if there is appropriate work to conserve said species by outside entities (such as we've seen with the Sage Grouse in Colorado recently). However, from what I can tell I do not believe this is the case with the Yellowstone grizzly, and I would like to lend my voice to the "do not delist the grizzly" cause.	1100		Post-delisting monitoring and management	I can see delisting species (or not adding them to the list) if there is appropriate work to conserve said species by outside entities (such as we've seen with the Sage Grouse in Colorado recently). However, from what I can tell I do not believe this is the case with the Yellowstone grizzly, and I would like to lend my voice to the "do not delist the grizzly" cause.	WELC	
I STRONGLY OPPOSE the desire of the state wildlife agencies to turn these magnificent bears into trophy heads for some hunters.KEEP THE GRIZZ LISTED !!!	1100		Post-delisting monitoring and management	It's premature to consider delisting the Yellowstone grizz. Please do NOT remove the protection they have under the ESA. I STRONGLY OPPOSE the desire of the state wildlife agencies to turn these magnificent bears into trophy heads for some hunters. KEEP THE GRIZZ LISTED !!!	WELC	
Numbers a just to low and trophy hunting serves no good to the animal. Wyoming is know to get out of control when permitted to hunt freely. Just look at the slaughtering of the wolves this is not needed and now just being done for haterd! And my friends that is the future of the Grizzlies! Please do what is right for the Grizzlies and do not make this a loss we can not recover from!	1100		Post-delisting monitoring and management	Please do not delist the Grizzlies! Numbers a just to low and trophy hunting serves no good to the animal. Wyoming is know to get out of control when permitted to hunt freely. Just look at the slaughtering of the wolves this is not needed and now just being done for haterd! And my friends that is the future of the Grizzlies! Please do what is right for the Grizzlies and do not make this a loss we can not recover from!	WELC	
Allowing the continued expansion of the grizzly in an un-checked and un-managed manner is quite likely to have serious un-intended consequences. Including, but not limited to over-population of the range, deprivation of other wildlife species, conflicts with ranchers, home-owners and car/bear traffic accidents.	1100		Post-delisting monitoring and management	I am providing public comment with regards to consideration of the de-listing of grizzly bears from the Federal List of Endangered and Threatened Wildlife. I STRONGLY favor this planned de-listing. I believe that all of the criteria outlined for this de-listing to occur has been met, in fact it was met quite a few years ago. I also believe it is critical that wildlife management remain a State's right as they have proven records in the past of fervently protecting both the wildlife and the wildlife's habitat. I have no faith that the federal government is in a position to do a better job than the state. Allowing the continued expansion of the grizzly in an un-checked and un-managed manner is quite likely to have serious un-intended consequences. Including, but not limited to over-population of the range, deprivation of other wildlife species, conflicts with ranchers, home-owners and car/bear traffic accidents. Please allow this de-listing and the subsequent management of the bear population by the individual states. Thank-you, Dale E. Myers	FWS-R6-ES-2016-0042-0952	
It's my understanding that (Sec. 4(a)(1)(D)) of the ESA requires adequacy of existing regulatory mechanisms **before** animals can be removed from the endangered species list. If Montana has only listed today the hunting regs they are going to use once the grizzlies are delisted, how much time could the USFWS possibly have had to study that plan to determine its adequacy?The impression i'm getting is that they're just a great big bunch of "good ole boys" who make a wild arse guess then do whatever they please because there isn't anyone that can stop them.	1100		Post-delisting monitoring and management	It's my understanding that (Sec. 4(a)(1)(D)) of the ESA requires adequacy of existing regulatory mechanisms **before** animals can be removed from the endangered species list. If Montana has only listed today the hunting regs they are going to use once the grizzlies are delisted, how much time could the USFWS possibly have had to study that plan to determine its adequacy? The impression i'm getting is that they're just a great big bunch of "good ole boys" who make a wild arse guess then do whatever they please because there isn't anyone that can stop them.	FWS-R6-ES-2016-0042-3475	

The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government, as is the case with Gray wolves.	1100		Post-delisting monitoring and management	I OPPOSE the delisting of Grizzly Bears on the following grounds: In order to ensure the long term survival of this isolated population and expand its gene pool, protected corridors to other regions need to be established. The grizzly bear is one of the slowest reproducing mammals on this continent, taking a minimum of 3 years to produce each offspring. There is currently no significant increase in grizzly bear populations, therefore it is premature to reintroduce hunting on them, as it may put them in another serious decline. Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions. There is a decline in the grizzly bear's primary food sources due to climate change, forcing bears to search further for their food. If no federal protections are in place, grizzlies would not be able to reach further vital food sources in Wyoming. The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government, as is the case with Gray wolves.	FWS-R6-ES-2016-0042-0360	
Defenders opposes the U.S. Fish and Wildlife Service's (FWS) proposed rule to remove the GYE grizzly bear population from ESA protections for the following reasons, which we explain in detail below: 1) FWS's proposed rule relies on an assumption that state and other federal agencies will provide adequate regulatory mechanisms to protect the grizzly bear post-delisting, even though those regulatory mechanisms do not currently exist and are certainly not enforceable;	1100		Post-delisting monitoring and management	Thank you for the opportunity to comment on the proposed rule to remove the Greater Yellowstone Ecosystem (GYE) population of grizzly bears from Endangered Species Act (ESA) protections. Defenders of Wildlife (Defenders) is a national non-profit conservation organization founded in 1947 focused on conserving and restoring native species and the habitat upon which they depend. We submit the following comments on behalf of our more than 1.2 million members and supporters nationwide. Over the last two decades, Defenders has played an important role in the recovery of grizzly bears in the northern Rockies. Recognizing that the largest threat facing long term grizzly bear recovery is human related mortalities, Defenders has focused heavily on minimizing conflicts between bears and people through our grizzly bear coexistence program. Since 1997, we have invested more than \$1,000,000 in over 300 on-the-ground projects in the states of Montana, Idaho and Wyoming. Additionally, since 1997 Defenders has reimbursed livestock owners in Montana and Idaho more than \$423,000 for livestock losses due to grizzly bears (Wyoming has a state run program). Defenders pays full market value for livestock verified to have been killed by a grizzly bear and 50% for livestock deemed "probably" killed by a grizzly bear. In 2013, the Montana Livestock Loss Board added grizzly bears to its compensation and conflict prevention program, to which we contributed \$25,000 in startup funding. Defenders continues to pay compensation in Idaho where a state-run program does not yet exist. Defenders is committed to the recovery of grizzly bears both on the ground and at the policy level. Our policy work has included, but has not been limited to: Defenders' significant role in the late 1990s assisting the FWS with a proposal to reintroduce grizzly bears into the Bitterroot. Defenders' Federal Lands program working tirelessly addressing forest policy changes that impact grizzly bears and we continue to fight state and federal legislation that may endanger or undermine grizzly bear recovery. Defenders opposes the U.S. Fish and Wildlife Service's (FWS) proposed rule to remove the GYE grizzly bear population from ESA protections for the following reasons, which we explain in detail below: 1) FWS's proposed rule relies on an assumption that state and other federal agencies will provide adequate regulatory mechanisms to protect the grizzly bear post-delisting, even though those regulatory mechanisms do not currently exist and are certainly not enforceable; 2) the post-delisting habitat protections and mortality limits required by FWS in the proposed rule will not provide for long-term recovery of the grizzly bear; and 3) numerous and significant inconsistencies currently exist between the proposed rule, the recovery plan, and the conservation strategy that undermine FWS's assumptions about the level of protection that would be in place post delisting and make it difficult to assess how much protection the rule would actually provide. We have attached our complete comments and associated appendices. Thank you for this opportunity to comment. Attachments 160510 FINAL to the FWS_Proposed Yellowstone Grizzly Delisting Greater Yellowstone Coalition GYE Griz Prop Zones 2 3 130620_DOW to FWS_Griz RP Dem Criteria	FWS-R6-ES-2016-0042-5018	
3) numerous and significant inconsistencies currently exist between the proposed rule, the recovery plan, and the conservation strategy that undermine FWS's assumptions about the level of protection that would be in place post delisting and make it difficult to assess how much protection the rule would actually provide.	1100	1101	Post-delisting monitoring and management	Thank you for the opportunity to comment on the proposed rule to remove the Greater Yellowstone Ecosystem (GYE) population of grizzly bears from Endangered Species Act (ESA) protections. Defenders of Wildlife (Defenders) is a national non-profit conservation organization founded in 1947 focused on conserving and restoring native species and the habitat upon which they depend. We submit the following comments on behalf of our more than 1.2 million members and supporters nationwide. Over the last two decades, Defenders has played an important role in the recovery of grizzly bears in the northern Rockies. Recognizing that the largest threat facing long term grizzly bear recovery is human related mortalities, Defenders has focused heavily on minimizing conflicts between bears and people through our grizzly bear coexistence program. Since 1997, we have invested more than \$1,000,000 in over 300 on-the-ground projects in the states of Montana, Idaho and Wyoming. Additionally, since 1997 Defenders has reimbursed livestock owners in Montana and Idaho more than \$423,000 for livestock losses due to grizzly bears (Wyoming has a state run program). Defenders pays full market value for livestock verified to have been killed by a grizzly bear and 50% for livestock deemed "probably" killed by a grizzly bear. In 2013, the Montana Livestock Loss Board added grizzly bears to its compensation and conflict prevention program, to which we contributed \$25,000 in startup funding. Defenders continues to pay compensation in Idaho where a state-run program does not yet exist. Defenders is committed to the recovery of grizzly bears both on the ground and at the policy level. Our policy work has included, but has not been limited to: Defenders' significant role in the late 1990s assisting the FWS with a proposal to reintroduce grizzly bears into the Bitterroot. Defenders' Federal Lands program working tirelessly addressing forest policy changes that impact grizzly bears and we continue to fight state and federal legislation that may endanger or undermine grizzly bear recovery. Defenders opposes the U.S. Fish and Wildlife Service's (FWS) proposed rule to remove the GYE grizzly bear population from ESA protections for the following reasons, which we explain in detail below: 1) FWS's proposed rule relies on an assumption that state and other federal agencies will provide adequate regulatory mechanisms to protect the grizzly bear post-delisting, even though those regulatory mechanisms do not currently exist and are certainly not enforceable; 2) the post-delisting habitat protections and mortality limits required by FWS in the proposed rule will not provide for long-term recovery of the grizzly bear; and 3) numerous and significant inconsistencies currently exist between the proposed rule, the recovery plan, and the conservation strategy that undermine FWS's assumptions about the level of protection that would be in place post delisting and make it difficult to assess how much protection the rule would actually provide.	FWS-R6-ES-2016-0042-5018	

				rule would actually provide. We have attached our complete comments and associated appendices. Thank you for this opportunity to comment. Attachments 160510 FINAL to the FWS_Proposed Yellowstone Grizzly Delisting Greater Yellowstone Coalition GYE Griz Prop Zones 2 3 130620_DOW to FWS_Griz RP Dem Criteria		
I also know that the states involved are fully capable of managing the bears without risk of taking a step backward in terms of maintaining a viable population in the Yellowstone ecosystem or achieving recovery in other ecosystems.	1100		Post-delisting monitoring and management	I fully support removing the greater Yellowstone ecosystem population of grizzly bears from the list for both practical reasons of coexisting with bears and from a biological standpoint. Without going in to regurgitating data to support my statement I will just say I know that the professional biologists from USFWS would not make such a proposal if there were not sufficient evidence to warrant doing so. I also know that the states involved are fully capable of managing the bears without risk of taking a step backward in terms of maintaining a viable population in the Yellowstone ecosystem or achieving recovery in other ecosystems. As far as concerns about the bears becoming genetically isolated first of all I would point out that a slight reduction of bears (if there even is) within the Yellowstone ecosystem is not going to have any affect. I would think genetic diversity within the Yellowstone ecosystem relies on transient animals from other ecosystems arriving in the Yellowstone ecosystem, keeping in mind that these transient animals will still be fully protected until their arrival I believe the delisting would have almost no affect in this regard. Having lived in close proximity to grizzlies from other ecosystems all my life I find it abundantly evident that they are recovering and dispersing and have no doubts genetic diversity is not in any danger from the proposed rule, if anything perhaps a slight reduction in the Yellowstone population may be beneficial in this regard as it would make room for transient animals to establish territories and eventually interbreed with the existing population. Knowing many people who live and recreate in the Yellowstone ecosystem I am shocked at how many tell me about frequent encounters with these bears. I am convinced the reason that the bears so commonly show little or no fear of humans is that management policies have prohibited people from engaging in activities which discourage bears from interaction with humans, including defense of life and property in all but the most dire of circumstances. Bears are very capable of learning from their experiences and I believe their behavior will change in a positive way resulting in less conflict if the proposed rule is adapted, this will be good for the bears in the long term, if sows teach their young to avoid humans rather than being indifferent to them, or worse yet seeking them out, more cubs will survive. While on the subject of cub survival I would also like to point out that if regulated hunting was established in any portion of the ecosystem it also has the potential of benefiting overall cub survival rates as well by reducing the number of mature boars which are known to kill cubs given the opportunity, in addition to helping restore a healthy fear of humans in all the bears. In reality state regulated hunting would provide funds for conservation efforts and create a better public perception of the bears as well as state and federal management agencies within the communities directly affected. Financially the proposed rule has many benefits both for government agencies as well as citizens. Federal managers would no longer be tasked with providing protection to a population segment that quite frankly has no more room to grow. State managers would no longer be tasked with monitoring a population they are forbidden from managing as a resource. Private citizens could potentially benefit in many ways including less loss of personal property and perhaps even revenue generated by regulated hunting. I believe that regardless of what biological evidence is produced to show that the recovery has been successful there will always be a certain group of activist minded people and organizations who will oppose delisting. This can be clearly seen when looking at recent efforts by activist groups on behalf of protecting wolves, the wolf story is one of rapid re-population of an enormous area, their ability to reproduce has been documented on an unprecedented scale, however the cries from activists continue. On that note I encourage the USFWS to move forward with the proposed rule, there will always be those who are opposed to such proposals on a philosophical level but the ESA was not established to further philosophies. The criteria for delisting has been met and in my eyes failing to act upon it would be nothing short of negligent.	FWS-R6-ES-2016-0042-0075	
Once recovered these species should be returned to state management as the endangered species act was intended to do.	1100		Post-delisting monitoring and management	The Grizzly Bear like the wolf in many areas has recovered and is an icon for conservation and the rehabilitation of species. Once recovered these species should be returned to state management as the endangered species act was intended to do. I support the USFWS decision to delist the Grizzly bear and believe it is the right step forward. Special interest groups should not be making decisions, biologists should. Thank you for the decision to delist the grizzly and I support it.	FWS-R6-ES-2016-0042-0146	
The bear is successfully recovered, and should now be managed by the state agencies, which have successfully recovered many other species.	1100		Post-delisting monitoring and management	It is time to remove the Grizzly Bear from the Endangered Species List. The bear is successfully recovered, and should now be managed by the state agencies, which have successfully recovered many other species. Grizzly bear and human conflicts will be reduced due to the bears will begin to see humans as a potential threat again. At this time, the bears have no threats, and are becoming accustomed as such. This can also bring some revenue to the state agencies, which are currently only spending revenue dealing with the problem bears. I for one, am a fan of the bears, and look forward to viewing them. Allowing state management of the animal will allow the state to manage the bear for what is best for the bear. Currently, with this being under federal protection, the bear is being managed under assumptions at the national level, and not by those who care for the bears themselves. I fully support the delisting of this animal.	FWS-R6-ES-2016-0042-0192	
Allowing state management of the animal will allow the state to manage the bear for what is best for the bear. Currently, with this being under federal protection, the bear is being managed under assumptions at the national level, and not by those who care for the bears themselves.	1100		Post-delisting monitoring and management	It is time to remove the Grizzly Bear from the Endangered Species List. The bear is successfully recovered, and should now be managed by the state agencies, which have successfully recovered many other species. Grizzly bear and human conflicts will be reduced due to the bears will begin to see humans as a potential threat again. At this time, the bears have no threats, and are becoming accustomed as such. This can also bring some revenue to the state agencies, which are currently only spending revenue dealing with the problem bears. I for one, am a fan of the bears, and look forward to viewing them. Allowing state management of the animal will allow the state to manage the bear for what is best for the bear. Currently, with this being under federal protection, the bear is being managed under assumptions at the national level, and not by those who care for the bears themselves. I fully support the delisting of this animal.	FWS-R6-ES-2016-0042-0192	

Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool.	?		Post-delisting monitoring and management	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the ecosystem is full or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before discretionary (hunting, management removals etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the states current management plan) i.e. Wyoming Range, southern Winds, Salt River Range. TO CONCLUDE: - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? - Bears are facing an uncertain future. Last year alone 43 bears were killed in conflicts, most of which were food related deaths. _____	FWS-R6-ES-2016-0042-0286	
If these animals become de-listed, please make sure there is a strict short and long term plan created by each state where grizzlies are known to live or travel through.	1100		Post-delisting monitoring and management	Docket FWS-R6-ES-2016-0042-0001 Hello-I want to see bears in the Greater Yellowstone Ecosystem, where I live. They deserve to be here, I don't. Don't let them be hunted or destroyed. They are smart as is proven by the research quoted on your website. I have bearly (pun intended!) seen 2 in the park, walking away or grazing, and minding their own business. This is as it should be. If these animals become de-listed, please make sure there is a strict short and long term plan created by each state where grizzlies are known to live or travel through. We don't want them to become hunters' targets. The species deserves to live and reproduce in numbers adequate that they find others with whom to mate that are unrelated. In Montana, this means they need to travel north/south along the Bitterroot and Gallatin mountains toward the national forests in and around Glacier Nat'l Park. Also, has anyone from USFWS consulted with the Canadians and what they are doing across the border to protect this keystone species? There are daily extinctions of species. Don't let this happen to this valued resource. Jerry Ladewig Emigrant, MT	FWS-R6-ES-2016-0042-0279	
Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology.	1100		Post-delisting monitoring and management	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Bitters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	

But as we have seen with the delisting of wolves, the states have demonstrated an utter lack of ability or intent to manage wildlife with a plan having even a modicum of sound scientific basis. What states have shown is an incredible ability to use all legal mechanisms possible, backed by well funded lobbyists, to kill wolves.	1100	factor D too?	Post-delisting monitoring and management	On its face, recognizing modest successes in grizzly population with removal from federal protection seems fine. But as we have seen with the delisting of wolves, the states have demonstrated an utter lack of ability or intent to manage wildlife with a plan having even a modicum of sound scientific basis. What states have shown is an incredible ability to use all legal mechanisms possible, backed by well funded lobbyists, to kill wolves. Why is there any reason to believe grizzlies won't be next. Idaho has been the poster child for this barbaric, unsound, environmentally undefendable policy and other states are not far behind. And so no, I cannot in good conscience approve any attempt to delist grizzlies until the states grow up, hire and listen to wildlife biologists instead of pandering to a myriad of other special interest groups which have no understanding of the role of an apex predator (or simply do not care) in the environment. At some point we humans need to drop our "grab your torch and pitchforks" mentality and actually act like the "superior species" we purport to be. All federal efforts for decades to help bring back wolves and grizzlies are going to be ruined within just a few years. It is completely unacceptable.	FWS-R6-ES-2016-0042-0287	
The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray wolves)	1100		Post-delisting monitoring and management	I OPPOSE the delisting of Grizzly Bears on the following grounds: 1) The current populations are being managed for stability, not growth. There is no significant increase in grizzly populations. Reinstating any kind of hunt prematurely on this species risks a decline in numbers that most likely will exceed reproduction rates. 2) Questionable science as to "Carrying Capacity". Rather than reaching carrying capacity, the decline in primary food sources due to climate change, non native fish, and heavy pesticide use; are forcing bears to search further for their food including cutthroat trout, especially Whitebark Pine nuts and army cutworm moths. 3) Without federal protections, grizzlies would not be able to reach further vital food sources in Wyoming. 4) The Grizzly bear species are the slowest reproducing mammals in North America. Reproducing every 3 years and at best, will duplicate herself in a 10-year period 5) Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. There has been no significant growth since 2000, according to the USFWS own records, with a population decline is likely occurring now as a result of high mortality linked to deteriorating habitat conditions. 6) The applicable states, Montana, Wyoming, and Idaho, have already proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray wolves) 7) Genetic Connectivity is vital to the long term survival of the species. The population/gene-pool is too isolated prohibiting genetic diversity within the species. For long term survival the grizzly needs protected corridors to reach other regions to expand the gene pool. 8) Even with Federal Protections, there have been too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management. 9) It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. 10) The Yellowstone grizzly population faces enormous threats from increasing regional human populations, energy development, climate change, decline in food sources caused by climate change, habitat degradation caused by climate warming, problematic livestock husbandry practices, hostile state management, and unreliable methods for monitoring status and trends. 11) Compared to other large carnivores, and with fragile numbers and increased threats, grizzly bears will be much more vulnerable to the effects of aggressive state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. 12) And, without doubt, colonization of new ranges will be the first casualty of state management. Populations will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range. I come to Yellowstone every year to view the wildlife. I don't understand with all the scientific evidence NOT TO DELIST, that you have to put a so called "management plan" in effect just to allow the grizzlies to be trophy hunted. Taking them off the Endangered Species Act has nothing to do with allowing the states to hunt and kill them to be made into rugs or head mounts.	FWS-R6-ES-2016-0042-0332	
State management of grizzlies could lead to disastrous consequences for the population. Removing federal protections for grizzlies means that the states of Wyoming, Montana, and Idaho will have management authority. The state of Wyoming, which holds the vast majority of the ecosystem's grizzlies, has proven itself incapable of managing large carnivores in any scientific manner. The same state that has had its vicious wolf management plan struck down in federal court not once, but twice. The same state that recently saw its legislature propose legalizing the barbaric practice of mountain lion trapping. That state now wants to take a shot at the grizzly. The three states allowed grizzly bear hunting right up until the time that grizzlies were listed in 1975, when the population was in a state of disaster. Additionally, the Wyoming plan effectively draws a line in the map, saying "no grizzlies past here" excluding the bear from large swaths of suitable habitat in the ecosystem like the Wyoming range and the southern Wind River range. It's worth noting that the bears favorite food source, the whitebark pine, is actually faring much better in those colder ranges in the ecosystem. If Wyoming has management, bears would not be able to access these areas. All three states are also chomping at the bit to offer grizzly bear trophy hunts. Given that Yellowstone's grizzlies are already dying in record numbers, the prospect of adding to that with a grizzly bear trophy hunt is a disturbing and unconscionable idea. This decision by the USFWS could have severe consequences for the Yellowstone grizzly bears prospects of surviving in the long term. The population is simply facing too many threats and too many unknowns at this point to even consider delisting, especially given what the states are proposing when they gain management authority.	1100		Post-delisting monitoring and management	I come to Yellowstone several times a year to view the Grizzly. I believe them to be one of your most valuable resources. I believe them to be far more valuable alive verses on someone floor. I will never venture into Idaho because of what they do to the wolves. I was hoping to relocate to your state upon retirement I could not support trophy hunting grizzly. We need to establish a safe corridor for biological diversity. We need to coexist and re introduce to other areas. I strongly oppose the delisting of the Yellowstone Grizzly bears. These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. The prospect of a trophy hunting season for these magnificent and beloved bears is very disturbing. The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies. Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country. Please do not delist the Yellowstone Grizzlies. "If the human race is to survive, then we must respect the rights of other species to survive. Sharing bedroom space with a grizzly bear is not practical but sharing wilderness space is. We must therefore, restrict human activity in spaces where threatened or endangered species live. We must stay out of their bedroom. Set aside some wild spaces while they yet exist. Closing the wild spaces after all of the wild things are gone will not work." - Bob McMeans Attachments grizReason Grizzly Bears Need Continued Endangered Species Act Protection to Survive, Conservation Groups Say	FWS-R6-ES-2016-0042-0266	

Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range &	1100		Post-delisting monitoring and management	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? - Bears are facing an uncertain future. Last year alone 43 bears were killed in conflicts, most of which were food related deaths.	FWS-R6-ES-2016-0042-0320	
The western state wildlife departments, sportsman, and conservation groups have demonstrated great success and competency at managing/increasing game species over the past century. When a species has value to sportsman, it in turn receives the financial and local demographic support to thrive on the landscape.	1100		Post-delisting monitoring and management	I am commenting in support of delisting the Grizzly Bear from the ESA and returning the management to the state wildlife departments. The Grizzly Bear recovery has been a great success with increasing numbers and dispersion documented through the Greater Yellowstone area. The intent of the ESA is not to list species in perpetuity; rather return management of recovered species to the states. The western state wildlife departments, sportsman, and conservation groups have demonstrated great success and competency at managing/increasing game species over the past century. When a species has value to sportsman, it in turn receives the financial and local demographic support to thrive on the landscape. Unfortunately, other "environmental" groups seem to funnel most of their efforts into attorney fees vs. conserving wildlife habitat. I live and recreate in the Grizzly Bear recovery area. I do not want to see them ever vanish from the landscape. I would like to see controlled hunting of male bears to scientifically manage their populations. I urge the USFWS to base the decision off of the unbiased science and delist the Grizzly Bear.	FWS-R6-ES-2016-0042-0392	
Don't let the grizzly bears become extinct. If their fate is turned over to the anti-carnivore states of Wyoming, Montana and Idaho this could happen. Wyoming's plan doesn't even allow for a no-hunting corridor around or between the parks. Many bears, mostly sow's with Cubs or older bears who need protection, hang out close to the roads. Without Federal protection these bears will be easy targets for hunters. Some hunters are already targeting specific bears that they intend to kill if they are delisted.	1100		Post-delisting monitoring and management	Do NOT delist the grizzly bears. They have the lowest reproduction rate of any North American mammal, their food sources are disappearing due to climate change and to the Lake Trout, they need to reach other bear populations for biological diversity, they're important to the Greater Yellowstone ecosystem, to our history and to our culture. I believe this is being fueled by greed and by the desire of some people to have a grizzly bear head as a trophy. Those are not reasons to delist them! Their are sound scientific reason to NOT delist them! Over a million people visit Yellowstone and Grand Teton annually, mostly to see grizzly bears. Don't let the grizzly bears become extinct. If their fate is turned over to the anti-carnivore states of Wyoming, Montana and Idaho this could happen. Wyoming's plan doesn't even allow for a no-hunting corridor around or between the parks. Many bears, mostly sow's with Cubs or older bears who need protection, hang out close to the roads. Without Federal protection these bears will be easy targets for hunters. Some hunters are already targeting specific bears that they intend to kill if they are delisted. Don't let this happen. Look at the statistics. Global warming is real, whatever the cause. It IS effecting the grizzly bear and other animals. That's reason enough not to delist them. We can live with the Bears. People can learn to keep their food inside, to be more careful when they're hiking and to carry bear spray when hiking in grizzly territory. The problems with bears have been caused by humans, not by the Bears! We should be able to deal with it. We're supposed to be the responsible ones. Let's act like it!	FWS-R6-ES-2016-0042-0417	

The park is not in a position to sustain the bears, please allow them to find sustenance in the surrounding areas until the park recovers.	1100		Post-delisting monitoring and management	At some point in time, we will have no vegetation due to the lack of predators keeping the wildlife in balance. This country is traveling down a "kill them all" road that has a point of no return. If we kill the grizzlies, the wolves, the mountain lions, etc, we are then put in the position to kill their prey or face the consequences of the animals eating all of the vegetation, including our food sources. As children we learned the circle of life, the checks and balances of every animal eats and all but the top predators are eaten. This is nature. Humans killing everything only creates problems, as we learn after the fact. If the grizzlies are leaving the park in search of food it only shows that the park environment needs time to rehabilitate itself. The prey leave, the predators leave, the plant life and smaller animals rebound. Then prey and predators return. Killing the predators because they travel outside your invisible boundary line only ensures the park will never reach a natural balance. We have systems of protection like the ESA because people are ruled by money, greed, and fear. People in power cannot be trusted with our environment, as that power shifts every election cycle. If the decision of control is left to the surrounding states, the grizzlies will become extinct. The park is not in a position to sustain the bears, please allow them to find sustenance in the surrounding areas until the park recovers. Let nature take care of itself.	FWS-R6-ES-2016-0042-0434	
Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable.	1100	1102	Post-delisting monitoring and management	We have lived, worked and recreated in the Greater Yellowstone Ecosystem (GYE) for almost 40 years, meeting working in Yellowstone National Park. We have explored by foot thousands of miles of trails into some of the most breathtaking landscapes on earth, filled with the suite of native wildlife that we so love and respect. We have seen many grizzly bears over the decades and no animal is more powerful in the public's sensibility than the Great Bear. It is our state animal, picked by Montana school children. Our native tribes greatly value the grizzly bear as do all of us who value our wild places and wildlife. The grizzly bear is greater than life; it represents all that we as a people almost lost and what we have preserved. We value our large predators, our carnivores, because they remind us that we share life together in this time and place. They represent the wilderness we almost lost. We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best: Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data. Because the ecosystem is becoming stressed by climate change causing dramatic changes in food supplies needed. Because all foods are not equal. Because grizzlies are being killed at a rate the slowly-reproducing animals cannot tolerate long-term; since 2002 the population has probably declined. Because connectivity with other bears depends upon GYE grizzlies roaming and hunting would preclude that. Because human caused mortality is mostly avoidable and prevention is not stressed enough. Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable. Because sport trophy hunting of grizzly bears would be abhorrent and would reverse recovery. Because tolerant bears that people see around the parks would be the first killed. Because wildlife watchers are ignored by state wildlife agencies and the USFWS. Just look at wolf and bison management. Because tribal interests are ignored by state wildlife agencies. Because wildlife watching brings in far more economically than does hunting in GYE states. Because listing the grizzly as a distinct population segment (DPS) is possibly illegal, because it precludes the bears seeking connectivity. Because the GYE grizzly bear lives on an ecological island. Because politics trumps science every time. We love our grizzly bears and want them protected from nefarious forces bent upon hunting them. USFWS should listen to the public's concerns, listen to opposing scientists and do the right thing. Do not delist the grizzly bear.	FWS-R6-ES-2016-0042-0422	
The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear. No one knows where the additional monies will come from to pay for implementation of the delisting plan. Â	1102		Post-delisting monitoring and management	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does not know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the	FWS-R6-ES-2016-0042-0452	

				development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear.No one knows where the additional monies will come from to pay for implementation of the delisting plan. 8. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. This means that the estimates of current population growth rates in the delisting plan will no longer apply after delisting. 9. The US Fish and Wildlife Service and the State of Wyoming appear to condone Wyoming county laws prohibiting bears within their borders. Four counties in Wyoming have passed laws barring bears within their borders. Recovery goals cannot be achieved if these counties implement their laws as they intend.		
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The US Fish and Wildlife Service and the State of Wyoming appear to condone Wyoming county laws prohibiting bears within their borders. Four counties in Wyoming have passed laws barring bears within their borders. Recovery goals cannot be achieved if these counties implement their laws as they intend .	1100		Post-delisting monitoring and management	I oppose delisting Yellowstone grizzly bears from the Endangered Species Act, for the following reasons: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. 2. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. 3. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. Recent studies show that whitebark pine loss is escalating from mountain pine beetle infestations - more quickly than US Fish and Wildlife Service (FWS) estimates. Research has demonstrated whitebark pine's relationship to the reproductive success of females and to lowering human-caused mortality; there appears to be no substitute bear food in the ecosystem. To compensate for the significant changes occurring rapidly in the ecosystem, the agency must protect suitable unoccupied habitat outside the recovery zone, including areas such as the Wind Rivers and Wyoming Range, where bears have been prohibited in the Wyoming plan. 4. Delisting relies on habitat management plans which are not yet in place. The public cannot be fairly asked to comment on the adequacy of regulatory mechanisms after delisting, if it does know what mechanisms exist. 5. Forest Service management plans will no longer contain binding habitat standards. Regulatory mechanisms to maintain habitat after delisting are not adequate if requirements are not binding. 6. The delisting plan contains no habitat protections for about one-third of occupied grizzly bear habitat. To sustain current population numbers, habitat conditions must also be maintained. But, the delisting plan only protects lands inside the six million acre recovery zone, and leaves out over two million acres of habitat. Contrary to FWS statements, only 15% of this land is protected as Wilderness, and the rest is open to development. 7. The plan lacks adequate funding mechanisms and fails to demonstrate agency commitment to implement the delisting plan. The delisting plan requires \$1.2 million per year in addition to what is already being spent on grizzly recovery. After delisting, ESA Section 6 funding to the states will disappear.No one knows where the additional monies will come from to pay for implementation of the delisting plan. 8. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. This means that the estimates of current population growth rates in the delisting plan will no longer apply after delisting. 9. The US Fish and Wildlife Service and the State of Wyoming appear to condone Wyoming county laws prohibiting bears within their borders. Four counties in Wyoming have passed laws barring bears within their borders. Recovery goals cannot be achieved if these counties implement their laws as they intend.	FWS-R6-ES-2016-0042-0452	
FWS claim: Their agency will stay involved with protecting the grizzly population after delisting. Å The reality: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. Å HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. Å	1100		Post-delisting monitoring and management	The U.S. Fish and Wildlife Service (FWS) wants to strip Endangered Species Act protection from the Greater Yellowstone Ecosystem grizzly bear. We have only until May 10 to comment on the FWS proposal. FWS claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claim: The shortage of cutthroat trout and white bark pine nutstwo of the grizzly's primary foods is not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. FWS claim: Their agency will stay involved with protecting the grizzly population after delisting. The reality: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said	FWS-R6-ES-2016-0042-5043	

				that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for delisting. FWS claim: The agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. The reality: When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America. If conditions are right, a female gives birth only every three years. In short, FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting.		
It's like a contractor offering a long dormant group of arsonists the opportunity to keep burning a house that they once nearly destroyed and he hasn't quite repaired. Sport hunters aren't criminals, but it is a destructive practice that depletes a population much faster than government efforts can rebuild them.	1100		Post-delisting monitoring and management	It's misleading to give the doubling of this population as an indicator of its stability. That doubling was the growth from 2% of the number in existence for tens of thousands of years and then reduced by 98% in less than one hundred years by sport hunting, nearly decimated twice, to 4%. And that growth was a result of FWS efforts. Why would the FWS put the results of that work in jeopardy by allowing same practice that nearly brought the grizzly to extinction in the last century? "Fool me once..." It's like a contractor offering a long dormant group of arsonists the opportunity to keep burning a house that they once nearly destroyed and he hasn't quite repaired. Sport hunters aren't criminals, but it is a destructive practice that depletes a population much faster than government efforts can rebuild them. FWS' works shouldn't be squandered like this. Only 20-26% of people surveyed have supported delisting or hunting seasons and the rates are lower in the local area. 50 Native governments have sent formal documents announcing their opposition to the delisting. There is no popular support for delisting. The tourism benefit of bringing into GYE sport hunters is so small compared to the loss of non-hunting tourists, as all of them now are, for whom the chance of seeing wildlife is such an important part of the park's appeal. For every one person who could shoot a given grizzly, fifty could have the experience of crossing its path, or seeing it through a telescope, finding its scat on a trail, or seeing the unbelievably high scratchings on a tree. Those are all memorable, maybe beautiful, maybe exhilarating or even terrifying experiences that make lifelong impressions and are taken away from a tourist, park ranger, local resident, and the whole ecosystem when a bear is killed. The potential tourism growth is outweighed by the potential loss, people don't support this, at all, and it doesn't make sense to hand the small recovery the GYE ecosystem has made straight back to the interests that recklessly inflicted the injury it's currently nursing, no matter how slow or carefully.	FWS-R6-ES-2016-0042-5067	
In remembrance of Scarface, the 25-year old Grizzly bear who was a park visitor favorite, and the first Grizzly bear I ever saw. Yet he was recently killed by a hunter outside park boundaries when he wandered, likely in search of food. A park icon gone, because he didn't read the park boundary signs and someone was waiting to kill him. This is what will happen to many more Grizzly bears if they are delisted now.	1100		Post-delisting monitoring and management	Please do not delist Grizzly Bears. Now is not the time to take away protections for this at-risk native species. In a time when climate change and habitat loss are challenging all wildlife to adapt and survive, the only reasonable and responsible action will be to rule that Grizzly Bears should not be delisted at this time. Grizzly bear food sources (including the whitebark pine) are collapsing and mortality rates are already increasing. Yellowstone Grizzly bears are experiencing a high level of conflict with humans and delisting would mean that any hungry bear who steps outside Yellowstone National Park will be killed by waiting hunters. Bears do not recognize park boundaries and bears just need to eat. The Greater Yellowstone Ecosystem is their home, and that includes the park and areas outside its boundaries. It is a fact that a prime motivation for the states of Idaho, Montana and Wyoming in pushing for delisting of Grizzly bears is trophy hunting and the perceived economic gain this 'sport' will bring. While the USFWS estimates there are more than 700 grizzlies in the Greater Yellowstone Ecosystem, no one really knows how many bears there are and this number could well be an over-estimation of true populations. Until it is known exactly how many grizzly bears exist in the Greater Yellowstone Ecosystem, it would be irresponsible to delist them and allow the states to open up their trophy hunt programs. Sport hunting is unnecessary for managing a stable bear population. At minimum, there should be a delay in the onset of hunting until Idaho, Montana and Wyoming have demonstrated their commitment to a responsible management plan and maintaining a stable population, particularly given the record high number (59) of bears killed in 2015. The leading cause of bear mortality is conflicts with humans. In remembrance of Scarface, the 25-year old Grizzly bear who was a park visitor favorite, and the first Grizzly bear I ever saw. Yet he was recently killed by a hunter outside park boundaries when he wandered, likely in search of food. A park icon gone, because he didn't read the park boundary signs and someone was waiting to kill him. This is what will happen to many more Grizzly bears if they are delisted now. Please do not delist Grizzly bears at this time. They must remain protected until Idaho, Montana and Wyoming have reasonable and science-based management plans in place, plans that do not consist of trophy hunting. Thank you for your consideration.	FWS-R6-ES-2016-0042-5074	

They must remain protected until Idaho, Montana and Wyoming have reasonable and science-based management plans in place, plans that do not consist of trophy hunting.	1100		Post-delisting monitoring and management	Please do not delist Grizzly Bears. Now is not the time to take away protections for this at-risk native species. In a time when climate change and habitat loss are challenging all wildlife to adapt and survive, the only reasonable and responsible action will be to rule that Grizzly Bears should not be delisted at this time. Grizzly bear food sources (including the whitebark pine) are collapsing and mortality rates are already increasing. Yellowstone Grizzly bears are experiencing a high level of conflict with humans and delisting would mean that any hungry bear who steps outside Yellowstone National Park will be killed by waiting hunters. Bears do not recognize park boundaries and bears just need to eat. The Greater Yellowstone Ecosystem is their home, and that includes the park and areas outside its boundaries. It is a fact that a prime motivation for the states of Idaho, Montana and Wyoming in pushing for delisting of Grizzly bears is trophy hunting and the perceived economic gain this 'sport' will bring. While the USFWS estimates there are more than 700 grizzlies in the Greater Yellowstone Ecosystem, no one really knows how many bears there are and this number could well be an over-estimation of true populations. Until it is known exactly how many grizzly bears exist in the Greater Yellowstone Ecosystem, it would be irresponsible to delist them and allow the states to open up their trophy hunt programs. Sport hunting is unnecessary for managing a stable bear population. At minimum, there should be a delay in the onset of hunting until Idaho, Montana and Wyoming have demonstrated their commitment to a responsible management plan and maintaining a stable population, particularly given the record high number (59) of bears killed in 2015. The leading cause of bear mortality is conflicts with humans. In remembrance of Scarface, the 25-year old Grizzly bear who was a park visitor favorite, and the first Grizzly bear I ever saw. Yet he was recently killed by a hunter outside park boundaries when he wandered, likely in search of food. A park icon gone, because he didn't read the park boundary signs and someone was waiting to kill him. This is what will happen to many more Grizzly bears if they are delisted now. Please do not delist Grizzly bears at this time. They must remain protected until Idaho, Montana and Wyoming have reasonable and science-based management plans in place, plans that do not consist of trophy hunting. Thank you for your consideration.	FWS-R6-ES-2016-0042-5074	
(2) a multi-year (too long) period needed to verify and take action on the grizzly population drop,	1100		Post-delisting monitoring and management	Delisting the grizzly bear is a misguided decision, and one based on politics, not science. Specifically, my concerns about the delisting are as follows: (1) availability of food for the bears, (2) a multi-year (too long) period needed to verify and take action on the grizzly population drop, (3) a primary conservation zone that is far too small, (4) poor grizzly genetic diversity and U.S. Fish and Wildlife Service's failure to improve the bears' genetics by bringing in an outside grizzly like they said they would do, and (5) removing grizzlies from the fringes will have negative impacts inside the primary zone for dispersal and bear cubs when a large bear is killed (new grizzlies move into his vacant territory and try to kill the bear cubs). In no way is the grizzly bear population in a health enough position to be delisted. Please reconsider this poor proposal and maintain the grizzly on the federal list of endangered and threatened wildlife. Thank you!	FWS-R6-ES-2016-0042-5081	
The primary factor affecting grizzly bears at both the individual and population level is excessive human-caused mortality. Regulating human-caused mortality through habitat management is an effective approach, as evidenced by increasing grizzly bear populations in the lower 48 States where motorized access standards exist (e.g., GYE and Northern Continental Divide Ecosystem). This requires ongoing monitoring of the grizzly bear population to understand if it is sufficiently resilient to allow for a conservative level of human-caused mortality without causing population decline.	1104		Post-delisting monitoring and management	We are adamantly against delisting the Greater Yellowstone Grizzly Bears from the Endangered and an Threatened Wildlife Species Act. An example as to why delisting of protected wildlife can be detrimental to a species has occurred with State management of the wolf population in Wyoming, Montana, and Idaho. Contest killings in both Montana and Idaho have occurred, which reflect the hatred that people have for "predator" species, and have been ignored by the States' FWS. The only certain outcome of delisting the Yellowstone grizzly bears is that it will result in trophy hunting. With delisting, the federal government will turn over grizzly management decisions outside of the park's boundaries to three states that will show no restraint in killing grizzlies. (Peacock, 2016) The Service has fiercely maintained that even if problems arise [under state management], it will not relist the population. Despite some laudatory language about co-existence with grizzly bears, the state grizzly bear management plans lack any binding commitments to do anything other than hunt bears. (Willcox, 2016) The growth of the grizzly population has leveled off; the current population estimate is down six percent from 2014. Mortality from all causes, as reported by the government, was 59 grizzlies in 2015. Reported mortality is about half of actual dead bears an accepted rule of thumb. Start adding in the bears that will be shot in the trophy hunt and you could easily approach 200 dead grizzlies in a single year. Even a population of 700 grizzly bears would be doomed to extinction by such heavy mortality. (Peacock, 2016) Even though the states may be somewhat cautious during the first five years of federal oversight that follows delisting, there is every reason to believe that, over time, state management will reverse the gains made over the last 40 years of endangered species protections. This is especially likely given the crisis that Yellowstone grizzly bears are facing now. During the past decade we have seen mounting numbers of grizzly bear deaths related to the collapse of important foods and rising conflicts organized around bears compensating by seeking more meat, especially from cows and the remains of hunter-killed elk. Indeed, this has been a record-breaking year for bear deaths, with 59 grizzly bears known to be dead, and another 30+ more that we don't know about, but which the government estimates probably are dead. This totals over 90 bears, or more than 12% of the population. The primary factor affecting grizzly bears at both the individual and population level is excessive human-caused mortality. Regulating human-caused mortality through habitat management is an effective approach, as evidenced by increasing grizzly bear populations in the lower 48 States where motorized access standards exist (e.g., GYE and Northern Continental Divide Ecosystem). This requires ongoing monitoring of the grizzly bear population to understand if it is sufficiently resilient to allow for a conservative level of human-caused mortality without causing population decline. We must allow adequate protections for these magnificent animals, so they are not another species destroyed by humans and management policies that are centered around a financial gain and political pressure.	FWS-R6-ES-2016-0042-5103	

Yet Servheen maintains that bear numbers in the Greater Yellowstone ecosystem will be closely monitored. If numbers should fall to 500, he told the Los Angeles Times earlier this year, that would trigger a management review, and a review could lead to an emergency relisting of grizzlies under the Endangered Species Act. "That's very discretionary and very fuzzy," countered Willcox. "There are no hard triggers anywhere in the state or federal plans," she said - no single, lower population number for grizzlies that would trigger an automatic relisting under the Endangered Species Act. Willcox's fear is that without a hard trigger, the states and U.S. Fish & Wildlife will use adaptive management to ineffectively tweak this or that aspect of this or that state plan, while habitat continues to be lost to development, foods continue to decline and bears continue to die. And, Willcox noted, the Bush administration has not voluntarily listed a single species in over four years - despite a backlog of thousands of species in danger of extinction. The political opposition to relisting grizzlies would be tremendous. Relisting might never occur, said Willcox, or come too late to do any good.'	1103	1100	Post-delisting monitoring and management	From the Yellowstone Park website: 'Bear mortality rates aren't the only worry for biologists. There's also the issue of genetic isolation among the bears in the Greater Yellowstone. The Yellowstone population has less genetic variation than is found in any other remnant population in North America. Researcher Lance Craighead and others have found that the Yellowstone grizzlies have lost 15-20 percent of their genetic variability over the past century. This could lead to inbreeding and worsen problems stemming from food loss, habitat loss and conflicts with people. Researchers Lisette Waites and Craig Miller have calculated that the Yellowstone population would need 1,850 grizzlies to maintain long-term genetic viability. Importing all those bears from Canada is not an acceptable option. Dr. Michael Gibeau, the foremost bear expert in Alberta, said the province has only 500 bears. "They're skinny and stressed," he said, from rampant energy and economic development and fragmentation of habitat. Gibeau said a female grizzly in Alberta needs 500 square kilometers of habitat, while a male needs 1,500-6,000 square kilometers, due to highly fragmented and lower quality habitats. Tapping Alberta bears to make up for U.S. losses is unrealistic, he said. "Bears are caught in a giant pinball game, bumping against people and mountain peaks," Gibeau said. In his research, he's found a linear relationship between road density and bear mortality: more roads mean more dead bears, because more roads increase opportunities for bears and people to meet. Yet Servheen maintains that bear numbers in the Greater Yellowstone ecosystem will be closely monitored. If numbers should fall to 500, he told the Los Angeles Times earlier this year, that would trigger a management review, and a review could lead to an emergency relisting of grizzlies under the Endangered Species Act. "That's very discretionary and very fuzzy," countered Willcox. "There are no hard triggers anywhere in the state or federal plans," she said - no single, lower population number for grizzlies that would trigger an automatic relisting under the Endangered Species Act. Willcox's fear is that without a hard trigger, the states and U.S. Fish & Wildlife will use adaptive management to ineffectively tweak this or that aspect of this or that state plan, while habitat continues to be lost to development, foods continue to decline and bears continue to die. And, Willcox noted, the Bush administration has not voluntarily listed a single species in over four years - despite a backlog of thousands of species in danger of extinction. The political opposition to relisting grizzlies would be tremendous. Relisting might never occur, said Willcox, or come too late to do any good.' Please, do not delist these bears.	FWS-R6-ES-2016-0042-5147	
Finally, I don't think delisting is an appropriate tool of adaptive management when applied to conservation biology. I'm not sure it works well within the regulatory framework of the Endangered Species Act. It is too coarse, too slow, and does not allow for versatile adaptability. I think it will be much more challenging to relist the grizzly than it is to delist (which is proving challenging enough). The numbers might look good at this moment in time but I'm worried about the long-term trend, with unresolved pressure from climate change and habitat fragmentation, on the stability of the grizzly bear.	1103		Post-delisting monitoring and management	I am writing to say I do not support the USFWS plan to delist the grizzly bear. Grizzly bear recovery has been a slowly successful, long-term process for the Interagency Grizzly Bear Study Team; they should be proud of their efforts. But I don't believe there is scientific consensus that the species is beyond the need for protection. And I don't believe there is agreement among all interests that the grizzly population is stable enough to withstand hunting. The USFWS states in a their press release from March 3, 2016 that delisting does not solely rely on numbers but also includes "the quantity and quality of habitat, adequate regulatory mechanisms to maintain a healthy and viable population, and a good balance of male and female bears that are well-distributed throughout the ecosystem." I believe all of these factors are unresolved and continue to place the grizzly bear at risk. 1) Quantity/quality of habitat. Climate change and development pressure continue to impact grizzly bear food sources and habitat. Traditional food sources (whitebark pine, cutworm moths, cutthroat trout) are threatened by climate change and invasive species. Development continues to fragment the edges and connectivity of core grizzly bear range. Management needs to aggressively protect habitat including limiting development and road densities in core areas. USFWS needs to work with states and other land management agencies to ensure long-term habitat protection. 2) Regulatory mechanisms. There are not adequate regulatory mechanisms in place to guarantee grizzly populations are maintained, especially if hunting is allowed. USFWS and states need to set strict caps on grizzly mortality and ensure mechanisms and funding are in place to reduce human-bear conflict. 3) Bear distribution. Scientists and concerned citizens have always maintained that in order to ensure a strong and stable population there must be a genetic connectivity to other grizzly populations in the Northern Rockies. I am concerned that pressure from hunting and other human-bear conflict will continue to isolate the Greater Yellowstone population. On an emotional and intellectual level I just don't believe an iconic animal such as the grizzly bear should be hunted. If they were restored to their historic range and allowed to roam the Rocky Mountains, the Great Plains and the Central Valley I might feel differently, but that is never going to happen. I think there is too much risk of increased mortality to bears if a spring and fall hunting season is opened. Finally, I don't think delisting is an appropriate tool of adaptive management when applied to conservation biology. I'm not sure it works well within the regulatory framework of the Endangered Species Act. It is too coarse, too slow, and does not allow for versatile adaptability. I think it will be much more challenging to relist the grizzly than it is to delist (which is proving challenging enough). The numbers might look good at this moment in time but I'm worried about the long-term trend, with unresolved pressure from climate change and habitat fragmentation, on the stability of the grizzly bear.	FWS-R6-ES-2016-0042-5158	

There also needs to be adequate and continual funding for Bear conservation in place, including bear management personnel to deal with bear-people conflicts, before delisting happens. The loss of federal money for conservation efforts is a major concern regarding delisting.	1102		Post-delisting monitoring and management	To the U.S. Fish and Wildlife Service: I am writing for the board of directors of the North Fork Preservation Association to comment on the proposal to remove Grizzly Bears in the Greater Yellowstone Ecosystem from the Federal List of endangered and threatened wildlife. Our community on the North Fork of the Flathead River in Northwest Montana, sitting just below the U.S./Canadian border next to Glacier National Park is one of the most ecologically diverse regions in North America. We also have the highest population of Grizzly Bears in the lower 48 states. Surrounded by public land and wildlife habitat, we have learned to live peacefully in the Grizzlys country. We value these bears and have enjoyed watching their numbers grow over the last few decades. The conservation efforts that have been deployed to encourage the Grizzly Bears recovery have been a great success. However, these efforts should be continued until Grizzly populations are connected over the entire landscape between Yellowstone and the Yukon. Isolated populations do not do well over the long run. Grizzly Bears need to be allowed to roam freely through all areas with suitable habitat. The Yellowstone grizzly bear population is an isolated population. There is very little evidence that Grizzly Bears from Yellowstone travel to other Grizzly Bear populations to the north. Without this connectivity, genetic diversity cannot remain strong in the Yellowstone population. For this reason, we feel that it is too early to delist Grizzly Bears. We also disagree with trophy hunting grizzly bears. It has taken many decades and millions of our tax dollars to change the trend toward extinction and hunting these iconic creatures seems contrary to everything that we have achieved. In addition, the status of Grizzly Bears in the public mind has risen. Many visitors come to Montana and Wyoming hoping to see a Grizzly Bear. These bears are the heritage of all of the people in the U.S., not just those of us who live in Montana, Wyoming, or Idaho. Just from an economic viewpoint these Bears generate more income for Montana, Wyoming, and Idaho from visitors than will ever be realized from 10-50 annual Trophy Tags. There are many more people who want to see a grizzly bear than shoot one. There also needs to be adequate and continual funding for Bear conservation in place, including bear management personnel to deal with bear-people conflicts, before delisting happens. The loss of federal money for conservation efforts is a major concern regarding delisting. For these reasons, we oppose the delisting of Grizzly Bears at this time.	FWS-R6-ES-2016-0042-5128	
A71TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states known for their hatred and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of	1102		Post-delisting monitoring and management	As a tax paying American I am asking that you do the right thing and NOT delist grizzlies! - DELISTING IS A BAD IDEA ECONOMICALLY. The grizzly bears of Yellowstone drive the region's billion dollar a year tourism industry. People come from all over the world to see these special bears, spending money in the local towns on food, lodging, guides and souvenirs. A new study demonstrates significant loss of tourism revenue when wolves in Yellowstone and Alaska are hunted. Why would it be any different with grizzlies? - TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states known for their hatred and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and most Americans (55%) oppose delisting. Even more Americans (68%) oppose hunting of grizzly bears if delisted. - USFWS MUST CONSIDER CLIMATE CHANGE. The proposed rule states that climate change has not impacted the bears and is not likely to in the future. USFWS made a similar argument with regard to wolverines and climate change and was reversed by a federal court. "Climate change affects all trends", according to President Obama, and is unprecedented in terms of its impact on food sources, behavior, etc. USFWS must at least seriously weigh the impact climate change will have on Yellowstone grizzly bears.	FWS-R6-ES-2016-0042-5238	
Toss in the already proposed hunting seasons in WY, MT and ID -- and the certainty that more bears will be killed if delisted -- and the conclusion should be inescapable that it is not yet the time to remove grizzlies from Endangered Species Act protections.	1100		Post-delisting monitoring and management	I want to go on record as strongly OPPOSING delisting for GYA grizzly bears from Endangered Species Act protections. As a 46-year resident of Montana I am very familiar with the Greater Yellowstone Area, its fish and wildlife. Also very familiar with the on-going development in and around Yellowstone, which shows no signs of slowing, let alone reversing the trend of putting ever more humans into the remnants of grizzly habitat and the predictable unfortunate outcome of bear-human interactions, which almost always end in grizzly mortality. I have personally backpacked into and camped out in every wilderness area in Montana, including into the Bob Marshall's famous Chinese Wall, all through Glacier as well as significant time in Yellowstone's backcountry. Truth is, I've seen exactly ONE grizzly bear during all those decades in the wild -- and that was in Glacier National Park. We do not hike with bear bells or other noise-makers on, so I'm quite sure we didn't "spook" any bears away on the hundreds of miles of trails hiked. I also skied across the entire length of both the Anaconda-Pintlar Wilderness (1983) and the Tobacco Root range (1997) and, despite it being early spring when the bears should have been coming out of hibernation, saw not one bear. Consequently, I'm finding it a little hard to believe we now have a "recovered" grizzly population in the Greater Yellowstone area -- or Montana, for that matter. The grizzlies in the Cabinet-Yaak area have been struggling for decades, despite "recovery" attempts and are primarily impacted by habitat loss due to logging and development, with the primary problem being human-caused mortality. It's worth considering the Cabinet-Yaak example because there is currently political pressure to increase logging throughout Montana, including in the GYA (Hebgen Lake area, specifically). Moreover, climate change has already severely impacted traditional food sources for GYA bears with the massive die off of white bark pines. Add to that the illegal introduction of lake trout into Y-stone Lake and the subsequent reduction in historic cutthroat trout spawning runs and the future food supplies for grizzlies in the GYA will probably lead to even more conflicts since both cattle and sheep graze public and private lands in the GYA -- and the Forest Service shows no signs of significantly reducing livestock grazing to protect grizzlies. Likewise, climate change is driving wildfires due to lower snowpack, shorter, warmer winters, earlier springs, drought, and much higher summer temperatures. While the wildfires do not "destroy" forests as some claim, they certainly do affect grizzly habitat. Given the incredibly small "secure zones" for grizzlies, losing the forest cover in those areas to wildfire forces grizzlies into other areas and, again, more conflict with humans and livestock. Put it all together -- along with the predictions for increasing, not decreasing, temperatures -- and it should be obvious that grizzly bears do not have a smooth ride into the future. Toss in the already proposed hunting seasons in WY, MT and ID -- and the certainty that more bears will be killed if delisted -- and the conclusion should be inescapable that it is not yet the time to remove grizzlies from Endangered Species Act protections. Thanks for the opportunity to comment and I hope you're listening to the public on this issue. It doesn't take long to go back through the comments online to see that virtually all of them are against delisting at this time. As someone who actually lives in Montana and knows its wilderness, wildlife and fish very well, I can only hope that you'll take my concerns into serious account when it comes time to make your decision.	FWS-R6-ES-2016-0042-5223	

The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population.	1100		Post-delisting monitoring and management	The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. The plan wrongly assumes that the future will look like the past. It calls for maintaining habitat conditions as of 1998, but 1998 conditions have already changed significantly and will continue to do so. The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population. Research has also shown threshold population effects, which could mean that by the time the problem is detected, it is too late to fix the problem. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Indeed, at the recent announcement of the delisting proposal, Senator Larry Craig used the opportunity to call for weakening the Endangered Species Act. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources. The delisting plan lacks binding motorized access management standards to protect habitat. The 1993 Grizzly Bear Recovery Plan and scientific research have demonstrated that roads kill bears.	FWS-R6-ES-2016-0042-5224	
With development increasing in the Northern Rockies region, public lands are critical for providing essential secure habitat for grizzly bears into the future. The agencies in charge of our public lands have an obligation to ensure that an iconic species like the grizzly bear can continue to thrive. However, the U.S. Forest Service has not revealed when it will amend the management plans of the six national forests surrounding Yellowstone to provide for adequate habitat protections for grizzly bears post-delisting or when this process would be available for public review.	1100		Post-delisting monitoring and management	Thank you for the opportunity to comment on potential Yellowstone Grizzly de-listing. Prairie Hills Audubon Society wants to be assured that the states and federal land management agencies, including the U.S. Forest Service, will manage bears and their habitat in a way that ensures a healthy and expanding grizzly bear population into the future. Prairie Hills Audubon Society is seriously concerned that the U.S. Fish and Wildlife Service (FWS) does not have all the required information and assurances finalized to make an informed decision. Specifically, the Endangered Species Act requires that, before delisting can occur, among other things, there are adequate regulatory mechanisms in place to ensure that the grizzly bear does not slip back towards extinction. These regulatory mechanisms are the responsibility of the states of Wyoming, Montana and Idaho and the appropriate federal land management agencies. However, the necessary management plans that provide these commitments have not been finalized and provided to us by the FWS for review with the proposal. Wyoming has yet to finalize a revised grizzly bear state management plan, and the recently completed draft is not consistent with statements made in the delisting proposal. It is unclear if, let alone when, Idaho or Montana will update their management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the adequate regulatory mechanisms that are required. With development increasing in the Northern Rockies region, public lands are critical for providing essential secure habitat for grizzly bears into the future. The agencies in charge of our public lands have an obligation to ensure that an iconic species like the grizzly bear can continue to thrive. However, the U.S. Forest Service has not revealed when it will amend the management plans of the six national forests surrounding Yellowstone to provide for adequate habitat protections for grizzly bears post-delisting or when this process would be available for public review. Prairie Hills Audubon Society encourages the FWS to continue to work with the state grizzly bear management agencies, tribal agencies and state and federal land management agencies that will be responsible for grizzly bears post delisting on: - Ensuring that robust protections remain in place for the Yellowstone grizzly bear core population including strict limits on mortality and strong habitat protections within the Primary Conservation Area (PCA), the area identified to remain the most protective for grizzly bears after delisting; - Giving Yellowstone grizzly bears the opportunity to continue to expand their range and reconnect with other grizzly bear populations to the north as well as allow for Yellowstone grizzly bears to expand into the Bitterroot Recovery Zone, currently absent of a grizzly bear population; - Expanding and strengthening habitat protections currently only allocated to the PCA into the larger Demographic Monitoring Area and further into areas identified as important to linkage between grizzly bear populations; - Continuing and strengthening programs that proactively minimize conflicts between bears and people thereby improving social tolerance and public acceptance for the bears throughout their range; and, - Working together to broaden partnerships and secure long term adequate funding for grizzly bear conservation and recovery into the future. In summary, Prairie Hills Audubon Society opposes the delisting of grizzly bears in the Yellowstone Ecosystem and request that the U.S. Fish and Wildlife Service withdraw the proposal until such time as all the required state and federal management plans and other documents that detail how this population of grizzly bears and their habitat will be managed post-delisting are finalized. This is too important of a decision to make without a full understanding of how bears and their habitat will be managed once delisted. Furthermore, there is no reason to rush this process.	FWS-R6-ES-2016-0042-5311	

Working together to broaden partnerships and secure long term adequate funding for grizzly bear conservation and recovery into the future.	1102		Post-delisting monitoring and management	Thank you for the opportunity to comment on potential Yellowstone Grizzly de-listing. Prairie Hills Audubon Society wants to be assured that the states and federal land management agencies, including the U.S. Forest Service, will manage bears and their habitat in a way that ensures a healthy and expanding grizzly bear population into the future. Prairie Hills Audubon Society is seriously concerned that the U.S. Fish and Wildlife Service (FWS) does not have all the required information and assurances finalized to make an informed decision. Specifically, the Endangered Species Act requires that, before delisting can occur, among other things, there are adequate regulatory mechanisms in place to ensure that the grizzly bear does not slip back towards extinction. These regulatory mechanisms are the responsibility of the states of Wyoming, Montana and Idaho and the appropriate federal land management agencies. However, the necessary management plans that provide these commitments have not been finalized and provided to us by the FWS for review with the proposal. Wyoming has yet to finalize a revised grizzly bear state management plan, and the recently completed draft is not consistent with statements made in the delisting proposal. It is unclear if, let alone when, Idaho or Montana will update their management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the adequate regulatory mechanisms that are required. With development increasing in the Northern Rockies region, public lands are critical for providing essential secure habitat for grizzly bears into the future. The agencies in charge of our public lands have an obligation to ensure that an iconic species like the grizzly bear can continue to thrive. However, the U.S. Forest Service has not revealed when it will amend the management plans of the six national forests surrounding Yellowstone to provide for adequate habitat protections for grizzly bears post-delisting or when this process would be available for public review. Prairie Hills Audubon Society encourages the FWS to continue to work with the state grizzly bear management agencies, tribal agencies and state and federal land management agencies that will be responsible for grizzly bears post delisting on: - Ensuring that robust protections remain in place for the Yellowstone grizzly bear core population including strict limits on mortality and strong habitat protections within the Primary Conservation Area (PCA), the area identified to remain the most protective for grizzly bears after delisting; - Giving Yellowstone grizzly bears the opportunity to continue to expand their range and reconnect with other grizzly bear populations to the north as well as allow for Yellowstone grizzly bears to expand into the Bitterroot Recovery Zone, currently absent of a grizzly bear population; - Expanding and strengthening habitat protections currently only allocated to the PCA into the larger Demographic Monitoring Area and further into areas identified as important to linkage between grizzly bear populations; - Continuing and strengthening programs that proactively minimize conflicts between bears and people thereby improving social tolerance and public acceptance for the bears throughout their range; and, - Working together to broaden partnerships and secure long term adequate funding for grizzly bear conservation and recovery into the future. In summary, Prairie Hills Audubon Society opposes the delisting of grizzly bears in the Yellowstone Ecosystem and request that the U.S. Fish and Wildlife Service withdraw the proposal until such time as all the required state and federal management plans and other documents that detail how this population of grizzly bears and their habitat will be managed post-delisting are finalized. This is too important of a decision to make without a full understanding of how bears and their habitat will be managed once delisted. Furthermore, there is no reason to rush this process.	FWS-R6-ES-2016-0042-5311	
The United States Fish and Wildlife Service proposes to remove the Greater Yellowstone Ecosystem (GYE) Grizzly Bears from the Endangered and Threatened Wildlife list. Also, the affected states promise to continue to ensure the grizzly bear population remains. I think that delisting the Grizzly Bears would only work if there were policies that were strictly enforced to ensure the continuation of the grizzly bear population. The major worry is that human caused mortality will quickly exceed the grizzly bear reproduction. Grizzly bear reproduction is a slow process and about half the cubs do not survive. Based on the fact that they are slow reproducers I believe the bears should stay on the endangered list for at least 5-10 more years and then maybe slowly introduce different policies that may allow regulated hunting again.	1100		Post-delisting monitoring and management	The United States Fish and Wildlife Service proposes to remove the Greater Yellowstone Ecosystem (GYE) Grizzly Bears from the Endangered and Threatened Wildlife list. Also, the affected states promise to continue to ensure the grizzly bear population remains. I think that delisting the Grizzly Bears would only work if there were policies that were strictly enforced to ensure the continuation of the grizzly bear population. The major worry is that human caused mortality will quickly exceed the grizzly bear reproduction. Grizzly bear reproduction is a slow process and about half the cubs do not survive. Based on the fact that they are slow reproducers I believe the bears should stay on the endangered list for at least 5-10 more years and then maybe slowly introduce different policies that may allow regulated hunting again. According to an article in the national geographic that addresses this issue, it is believed that if the very states that failed to ensure the populations of grizzly bears gain control again, the population will quickly dwindle. Also, it is believed that this means the laws implanted will not be enforced well by these states. According to the article, the bears are worth a billion annually alive than dead, so it is better to keep the hunting levels down. Another problem endangering the grizzly bears is habitat and food. According to Yellowstone, there has been a 15-20 percent loss of their genetic variability. This could cause "inbreeding and worsen problems stemming from food loss, habitat loss and conflicts with people. A lot of these problems have to do with increased interaction between bears and humans. Dr. Michael Gibeau has done a lot of research on the correlation between increased number of roads and bear mortality. Based on this information, bears are greatly affected by the amount of human interaction and can definitely stress them out. I believe that the best way to conserve the bears is to conserve their habitat and try to decrease the human interaction (for example by building fewer roads through their homes). In conclusion I think that the bears should not be delisted, at least not right now. When thinking about laws as a nation we must remember there will always be people who break the law. Therefore delisting them can cause people to break the rules more and more, as the laws become increasingly lenient.	FWS-R6-ES-2016-0042-0569	

According to an article in the national geographic that addresses this issue, it is believed that if the very states that failed to ensure the populations of grizzly bears gain control again, the population will quickly dwindle. Also, it is believed that this means the laws implanted will not be enforced well by these states. According to the article, the bears are worth a billion annually alive than dead, so it is better to keep the hunting levels down.	1100	1102	Post-delisting monitoring and management	The United States Fish and Wildlife Service proposes to remove the Greater Yellowstone Ecosystem (GYE) Grizzly Bears from the Endangered and Threatened Wildlife list. Also, the affected states promise to continue to ensure the grizzly bear population remains. I think that delisting the Grizzly Bears would only work if there were policies that were strictly enforced to ensure the continuation of the grizzly bear population. The major worry is that human caused mortality will quickly exceed the grizzly bear reproduction. Grizzly bear reproduction is a slow process and about half the cubs do not survive. Based on the fact that they are slow reproducers I believe the bears should stay on the endangered list for at least 5-10 more years and then maybe slowly introduce different policies that may allow regulated hunting again. According to an article in the national geographic that addresses this issue, it is believed that if the very states that failed to ensure the populations of grizzly bears gain control again, the population will quickly dwindle. Also, it is believed that this means the laws implanted will not be enforced well by these states. According to the article, the bears are worth a billion annually alive than dead, so it is better to keep the hunting levels down. Another problem endangering the grizzly bears is habitat and food. According to Yellowstone, there has been a 15-20 percent loss of their genetic variability. This could cause "inbreeding and worsen problems stemming from food loss, habitat loss and conflicts with people. A lot of these problems have to do with increased interaction between bears and humans. Dr. Michael Gibeau has done a lot of research on the correlation between increased number of roads and bear mortality. Based on this information, bears are greatly affected by the amount of human interaction and can definitely stress them out. I believe that the best way to conserve the bears is to conserve their habitat and try to decrease the human interaction (for example by building fewer roads through their homes). In conclusion I think that the bears should not be delisted, at least not right now. When thinking about laws as a nation we must remember there will always be people who break the law. Therefore delisting them can cause people to break the rules more and more, as the laws become increasingly lenient.	FWS-R6-ES-2016-0042-0569	
It is obvious that states cannot be trusted to manage wildlife. The three states of Montana, Wyoming and Idaho have shown little if any ability to be in agreement when it comes to managing wolves or other species. I see grizzly bear management from these states no different. There would need to be some uniformity, consistency, and communication among these three states to prevent elimination of the bear from certain landscapes. There has been no such history of such behavior of coordinating efforts.	1100		Post-delisting monitoring and management	See attached file(s). In the attached file, I have comments on the following docket number: Number FWS-R6-ES-2016-0042. Attachments Comments on Delisting Grizzly Bears.20160331	FWS-R6-ES-2016-0042-0540	
Also the current management of this animal is causing excessive danger to both bear and human alike. It has recovered and the greater population needs new management to ensure safety of the public and success of the bear.	1100		Post-delisting monitoring and management	Please follow the existing law and de-list the Yellowstone Grizzly Bear as all requirements to do so have been met. Also the current management of this animal is causing excessive danger to both bear and human alike. It has recovered and the greater population needs new management to ensure safety of the public and success of the bear.	FWS-R6-ES-2016-0042-0701	
Given how slowly bears reproduce, the current proposal to allow Wyoming and the other states to exceed the maximum number of bear deaths for several years before even initiating a review could mean that the population is in steep decline before any emergency action can be taken. Instead of promoting and implementing proven co-existence methods to reduce conflicts between bears, livestock, and people, Wyoming plans to aggressively manage bears, including potentially killing them pre-emptively.	1103		Post-delisting monitoring and management	I live in Jackson, WY and regularly hike and enjoy the wildlife in the Grand Teton National Park and Yellowstone National Park. Removing the grizzly bear from the federal list of endangered and threatened wildlife is a step backward in grizzly recovery, and will result in a smaller grizzly bear population over a smaller area than exists today. Grizzly bears are also a positive economic driver, bringing much more revenue to Wyoming from people who want to see these majestic animals alive and in the wild, rather than through hunting tags. If grizzly bears in the Yellowstone region are delisted, Wyoming plans to initiate a sport trophy hunt. Fifty Native American tribes and many other people are opposed to trophy hunting of grizzly bears. Given how slowly bears reproduce, the current proposal to allow Wyoming and the other states to exceed the maximum number of bear deaths for several years before even initiating a review could mean that the population is in steep decline before any emergency action can be taken. Instead of promoting and implementing proven co-existence methods to reduce conflicts between bears, livestock, and people, Wyoming plans to aggressively manage bears, including potentially killing them pre-emptively. This is an unacceptable and counterintuitive action that the Fish and Wildlife Service absolutely should not undertake.	FWS-R6-ES-2016-0042-0741	

The grizzly was placed on the endangered species list and should remain so. There is no unified plan that has been submitted and approved by the people of each state to manage these bears. The states each have their own management plans but do not take into consideration the number of bears that will be allowed to be killed by the other states. There are no controls, there is no cohesion in the states management plan.	1100		Post-delisting monitoring and management	I strongly OPPOSE the delisting of the GYE grizzlies. The grizzly is facing losses of some of their key food sources such as the white bark pine. This has been studied and the concerns of loss of these foods has been supported by the Ninth Circuit Court of Appeals, Federal District Judge Molloy. The cutthroat trout are also diminishing due to the introduction of non native species causing 2 of the grizzlies main food sources to scarce. With these food supplies short they must look elsewhere for new foods to replace these. With no protections outside the park they will not have the habitat needed to establish new food sources. The lack of food sources is what cause the very few and far between encounters with ranchers livestock. The adjoining states have already said and have it in their plans to allow killing of any grizzlies who pose a threat to their livestock. The reproduction rate of the grizzly is slow and without the necessary food sources to make it through hibernation there will be fewer births. If you consider this in conjunction with the amount of bears each state is going to allowed to be hunted, the number of bears that will inevitably be killed because due to ranchers seeing them as a threat to their livestock, the current population of bears will not stand the reduction without grave consequences. The citizens of the united states have paid for the protection of these bears. Your office has been charged with the duty of safe guarding these bears and delisting them without more thought and planning for the delisting will certainly put them back in an endangered state. The areas which border the GYE is becoming more heavily populated. With the encroachment of development the bears have very little space in which to travel from one population to another for breeding. If there are no safe guards for the bears to migrate to other areas the population will be trapped, this again brings them to the point of being endangered. There is no reason for hunting a bear other than sport and the money the states have proposed to charge for the hunting of this prized animal will in no way cover the cost the tax payers have already paid to protect that bear. It just doesn't make sense. The ranches are compensated by the numerous willing organizations for the loss of any animal killed by a bear. So it is not like the grizzlies are out there destroying herds of cattle. In fact as per your own studies the losses of ranchers has been minimal, and the ranchers do not loss money. At the very least the Primary Conservation area should be increased to include bear corridors, and am ample area around the entire GYE for the bears. Encounters with bears for people are rare, and most of those have proven it was not the bears fault, but the people's; regardless those bears have been killed. If people are going to go into bear country and not be prepared it is their fault and the entire population of bears should not have to pay the price for human stupidity. If you allow the states to openly place and advertise these great bears can be shot for a trophy what are you saying about your plan and your entrusted duty to safe guard the animals of our great parks and country. The states of Wyoming and Idaho allow for baiting of bears. They are saying it will not be allowed for the grizzly but it is not in their plan and when someone baits a black bear and a grizzly shows up that someone will shoot it and claim they thought it was a black bear. The current grizzly population cannot withstand these additional killings. The grizzly was placed on the endangered species list and should remain so. There is no unified plan that has been submitted and approved by the people of each state to manage these bears. The states each have their own management plans but do not take into consideration the number of bears that will be allowed to be killed by the other states. There are no controls, there is no cohesion in the states management plan. There is no rush to delist, there are to many threats out there for the bears food sources, impacts of climate change. I oppose the delist.	FWS-R6-ES-2016-0042-0739	
I support the idea and decision to remove them from the endangered list solely because I know wildlife managers and hunters can control the population and support the bears better than any federal government agency or anti-hunting organization. This is a fact.	1100		Post-delisting monitoring and management	As an outdoorsman, fisherman, hunter, conservationist and supporter of the Rocky Mountain Elk Foundation, I fully support the idea/decision to remove the greater Yellowstone ecosystem population of grizzly bears from the list of endangered and threatened wildlife. It's a proven fact that grizzly bears have recovered to a sustainable population in the Yellowstone area and have moved way beyond it's boundaries. Just this past September, I had a friend hunting in WY attached by a grizzly bear that had found his downed elk before he did. I've also heard countless stories of bears encountering hikers and fishermen in WY and Montana. I personally have no desire to hunt a grizzly bear and delisting them will have no direct impact on me. I support the idea and decision to remove them from the endangered list solely because I know wildlife managers and hunters can control the population and support the bears better than any federal government agency or anti-hunting organization. This is a fact.	FWS-R6-ES-2016-0042-0884	
States have managed such a wide section of wildlife for many years and they have done a wonderful job. Make it possible for this to continue.	1100		Post-delisting monitoring and management	Over the last hundred years wildlife has been supported and managed by scientific information. Numbers have been set and requirements made to insure the survival of every endangered species. Removing the Grizzly Bear from the Federal Endangered Species classification is not only the proper thing to do but also what the Endangered Species Act was designed to do. I know we will always have those "groups" that sit in the cities, watch TV, and contribute nothing to preserving any wildlife; that will protest any action no matter what scientific evidence says. States have managed such a wide section of wildlife for many years and they have done a wonderful job. Make it possible for this to continue.	FWS-R6-ES-2016-0042-1155	

Just like elk, deer, moose, mountain lion and other wild game, Grizzly Bear (and wolves too for that matter) should be managed by the respective state game management entity so a balanced predator/prey environment can be more effectively achieved for the benefit of all species and the habitat they live in and live off of. This will also benefit the hunting community by allowing all game animals to have a better chance to thrive with balanced and sustainable numbers for all.	1100		Post-delisting monitoring and management	As an avid hunter and outdoor activity proponent I very strongly support the delisting of Yellowstone Grizzly Bear so they can be managed like all wild game animals should be. Just like elk, deer, moose, mountain lion and other wild game, Grizzly Bear (and wolves too for that matter) should be managed by the respective state game management entity so a balanced predator/prey environment can be more effectively achieved for the benefit of all species and the habitat they live in and live off of. This will also benefit the hunting community by allowing all game animals to have a better chance to thrive with balanced and sustainable numbers for all. These decisions should NOT be left to animal rights activists as evidenced by how they have caused game and wildlife management problems with the introduction of grey wolves and thrown lawsuit after lawsuit in the way of state wildlife management agencies long after the previously agreed upon sustainable numbers had been reached. As a result of their overzealous actions to allow wolf populations to grow unchecked, these predators have since spread to many more states and areas that were not intended to have them, such as Oregon, Washington, Idaho and now even Colorado. The problems these unmanaged predators have caused to elk, deer, moose and other game animals, as well as the destruction of livestock by the wanton "sport hunting" wolves are known to perpetuate are too numerous to list here. That said, delisting Grizzly Bear and NOT allowing animal rights activists to prevent them from being properly manages should not be allowed or tolerated. If man is going to be involved in managing wildlife then excluding certain species, regardless of their being predator or prey, is just wrong. Man should either manage all or manage none. Managing none is not a wise choice based on history and the near wipe-out of species in our nation's early history. Hunters in general have become the conservationists with the most vested interest in preserving wildlife and raising money to do so. In contrast animal rights activists don't even come close.	FWS-R6-ES-2016-0042-1162	
I think that the management of the Grizzly is much more effective in the hands of the states involved than to have the Federal Governmentmanage it from an outsiders point of view.	1100		Post-delisting monitoring and management	I guided elk hunters in the Teton Wilderness starting early in the 1970's till 1986 and in the early days of guiding we never had encounters with Grizzly bears for the most part. Once the Grizzly's were put on the endangered list we saw the progression that the bears lost their fear of humans and became more aggressive toward coming into hunting camps etc. We then seen that they related gun shots with an elk kill and were on the gut piles or the carcasses in very short order. My personal feeling is that we did more harm to the Grizzly by putting them on the endangered list than we did to help them. I think that the management of the Grizzly is much more effective in the hands of the states involved than to have the Federal Government manage it from an outsiders point of view.	FWS-R6-ES-2016-0042-1195	
These decisions should NOT be left to animal rights activists as evidenced by how they have caused game and wildlife management problems with the introduction of grey wolves and thrown lawsuit after lawsuit in the way of state wildlife management agencies long after the previously agreed upon sustainable numbers had been reached. As a result of their overzealous actions to allow wolf populations to grow unchecked, these predators have since spread to many more states and areas that were not intended to have them, such as Oregon, Washington, Idaho and now even Colorado. The problems these unmanaged predators have caused to elk, deer, moose and other game animals, as well as the destruction of livestock by the wanton "sport hunting" wolves are known to perpetuate are too numerous to list here. That said, delisting Grizzly Bear and NOT allowing animal rights activists to prevent them from being properly manages should not be allowed or tolerated. If man is going to be involved in managing wildlife then excluding certain species, regardless of their being predator or prey, is just wrong.	1100		Post-delisting monitoring and management	As an avid hunter and outdoor activity proponent I very strongly support the delisting of Yellowstone Grizzly Bear so they can be managed like all wild game animals should be. Just like elk, deer, moose, mountain lion and other wild game, Grizzly Bear (and wolves too for that matter) should be managed by the respective state game management entity so a balanced predator/prey environment can be more effectively achieved for the benefit of all species and the habitat they live in and live off of. This will also benefit the hunting community by allowing all game animals to have a better chance to thrive with balanced and sustainable numbers for all. These decisions should NOT be left to animal rights activists as evidenced by how they have caused game and wildlife management problems with the introduction of grey wolves and thrown lawsuit after lawsuit in the way of state wildlife management agencies long after the previously agreed upon sustainable numbers had been reached. As a result of their overzealous actions to allow wolf populations to grow unchecked, these predators have since spread to many more states and areas that were not intended to have them, such as Oregon, Washington, Idaho and now even Colorado. The problems these unmanaged predators have caused to elk, deer, moose and other game animals, as well as the destruction of livestock by the wanton "sport hunting" wolves are known to perpetuate are too numerous to list here. That said, delisting Grizzly Bear and NOT allowing animal rights activists to prevent them from being properly manages should not be allowed or tolerated. If man is going to be involved in managing wildlife then excluding certain species, regardless of their being predator or prey, is just wrong. Man should either manage all or manage none. Managing none is not a wise choice based on history and the near wipe-out of species in our nation's early history. Hunters in general have become the conservationists with the most vested interest in preserving wildlife and raising money to do so. In contrast animal rights activists don't even come close.	FWS-R6-ES-2016-0042-1162	
I oppose this proposal because it will grant the states the right to begin to systematically target grizzlies attempting to recolonize former occupied habitat outside of a "Demographic MonitoringArea" for trophy sport hunts and this will guarantee that true grizzly recovery will be stopped in its tracks	1100		Post-delisting monitoring and management	I oppose the proposed Yellowstone Grizzly Bear Delisting Rule removing the bear from the protections of the Endangered Species Act at this time. I oppose this proposal because the Yellowstone grizzly lives on an island. This island has been isolated from other bear populations for over 100 years. As of this date the bears are still isolated from other populations and there is no provision in this delisting proposal to assure protected linkage habitat to other populations. In fact, the reverse is currently taking place with the US Sheep Experimental Station in the Centennial Mountains of Montana/Idaho still insisting that they must run sheep in this important linkage zone between Yellowstone and the vast central Idaho Wildlands (read their current EIS). The Sheep Station insistence that domestic sheep must take precedence over public wildlife helps insure that the Yellowstone bears will remain on an island. I oppose this proposal because there is still no secure grizzly population in the vast Central Idaho Wildlands even though plans were prepared some 20 years ago to translocate suitable bears into Idaho. This population will be essential to link up with the Yellowstone bears and more northern bear populations to form a truly recovered meta-population of grizzlies in the Lower 48. Until we have such an Idaho population I will know that the USFWS is not serious about achieving true Yellowstone grizzly recovery and I will continue to oppose a Delisting Rule. I oppose this proposal because it will grant the states the right to begin to systematically target grizzlies attempting to recolonize former occupied habitat outside of a "Demographic Monitoring Area" for trophy sport hunts and this will guarantee that true grizzly recovery will be stopped in its tracks. A wide ranging top-level opportunistic omnivore such as the grizzly can not be turned over to the provincial interests of the livestock driven agendas of the state game departments of Wyoming, Idaho and Montana. I oppose this proposal because it does not take into account the unavoidable declining food resources in the Yellowstone core that will accompany the global climate change that is now underway. The grizzlies are adaptable but we must give them the room to adapt in the face of climate change. The State of Wyoming has no intention of giving them that room. The best scenario that this will result from the Delisting Rule is maintenance of a relic population of bears but it can not and will achieve true Yellowstone grizzly bear recovery. The bears must be allowed to disperse into all biologically suitable habitat. An example--The Wyoming Range likely has some of the best bear habitat in the Greater Yellowstone Ecosvstem. Because of livestock political oower the State of Wyoming	FWS-R6-ES-2016-0042-1109	

				Some of the best bear habitat in the Greater Yellowstone Ecosystem. Because of intense poaching pressure, the state of Wyoming considers any bears who attempt to recolonize this superb habitat to be expendable and, beyond doubt, they will be high on the list for trophy, sport hunts. To repeat--to turn management of the Yellowstone grizzlies over to the states will assure that all the investment of time and money up to now toward recovering these bears will be for naught and we will have snatched "defeat right out of the jaws of victory". Now is not the time to turn back. I oppose this premature Proposed Rule for Yellowstone Grizzly Bear Delisting from the Endangered Species Act.		
In the past four years on the Upper Green River Cattle Allotment, confirmed depredations caused by grizzly bears have increased from 20 in 2010 to 80 in 2015. Since 1995, there have been over 500 head of cattle confirmed to have been killed by grizzly bears on this allotment. I fully support delisting of this species, as they have met every recovery goal ever established, and there have been several. Further, I support sport hunting of this species in areas like the Upper Green, where substantial conflict exists. I support management flexibility to address individual bears, not just numbers in a matrix. The Upper Green is in the Designated Monitoring Area (DMA), and the DMA was created to be an area both biologically suitable and socially acceptable for grizzly expansion. I have fought against the inclusion of the Upper Green in this grizzly management area, because the level of conflict that exists there is not socially acceptable to those of us making a living there. I ask that the Upper Green be removed from inclusion in the DMA. If the DMA is actually an area that is biologically important to grizzly bear recovery, then designate it such, but this area does not qualify as being socially acceptable for grizzly bears. The PCA was designated early on to be that area essential for grizzly bear recovery, and it has served that purpose well, as grizzlies have expanded great distances beyond the PCA. I am concerned that land use restrictions that have been put in place in the PCA, will be pushed throughout the DMA. I do not believe that is appropriate. How will the DMA boundary be amended in the future, as there is no process in place? If the states live up to their part of the bargain, and grizzlies continue to meet delisting requirements for the five year period that a conservation strategy is designed to exist for, can the DMA boundary be changed? USFWS should only retain management control for the five year period after the grizzly is delisted, then the states should have full management authority, unless the population demographics are not maintained. Why is there no physical description of the DMA is this proposed federal rule?			Post-delisting monitoring and management	I submitted comments earlier in the process, but wish to do so again, as I have other issues to present. My family has grazed in the Upper Green River, on the Bridger-Teton National Forest, for well over 100 years. We have persisted in spite of the long trail, bureaucrats, and grizzly bears. At no time in the history of the Upper Green River Cattle Association, of which my family was a founding member 100 years ago this year, has depredation from large carnivores, especially grizzlies, been so pervasive. In 1993, our association saw its first grizzly kill in a generation, and in 2015 members of the association saw 80 head of livestock confirmed by Wyoming Game and Fish personnel as killed by grizzly bears. In 2015, this association lost more nearly 14% of its calf crop, or 290 calves, to natural causes and predation. This level of predation is unprecedented. We are excited to see that the grizzly bear may, once again, be delisted from the Endangered Species Act, and that management authority could return to the state of Wyoming. The Wyoming Game and Fish Department (WGFD) have been instrumental in supporting the recovery of this iconic species, and they have been great partners with our association through the thick and the thin of grizzly recovery. Without the compensation program initiated by the WGFD, most of us grazing cattle in the Upper Green would no longer be there, ending a 100 year tradition. Individual members of the WGFD have worked tirelessly, even 24/7, to resolve conflict issues when grizzlies kill livestock. In the past four years on the Upper Green River Cattle Allotment, confirmed depredations caused by grizzly bears have increased from 20 in 2010 to 80 in 2015. Since 1995, there have been over 500 head of cattle confirmed to have been killed by grizzly bears on this allotment. I fully support delisting of this species, as they have met every recovery goal ever established, and there have been several. Further, I support sport hunting of this species in areas like the Upper Green, where substantial conflict exists. I support management flexibility to address individual bears, not just numbers in a matrix. The Upper Green is in the Designated Monitoring Area (DMA), and the DMA was created to be an area both biologically suitable and socially acceptable for grizzly expansion. 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If the states live up to their part of the bargain, and grizzlies continue to meet delisting requirements for the five year period that a conservation strategy is designed to exist for, can the DMA boundary be changed? USFWS should only retain management control for the five year period after the grizzly is delisted, then the states should have full management authority, unless the population demographics are not maintained. Why is there no physical description of the DMA is this proposed federal rule? Albert Sommers	FWS-R6-ES-2016-0042-1222	
Delisting relies on habitat management plans which are not yet in place. We are just beginning the Forest Plan Revision for Custer-Gallatin NF. This will take years. There is no guarantee that bear habitat will be protected or that FS funding will be adequate for monitoring. A related factor is the rapidly growing population in our area and the increased number of recreational use within the Custer Gallatin NF. This will impact habitat/bear management. Additional monitoring and money for educational programs will be needed which may and may not be forthcoming.	1102		Post-delisting monitoring and management	See Attached Attachments Patten Eva	FWS-R6-ES-2016-0042-1227	

Upon delisting of the GYE grizzly bear, the states of Wyoming, Montana, and Idaho along with the NPS, U.S. Forest Service (USFS), Bureau of Land Management (BLM) and tribes will collectively co-manage this species and habitat within the identified Demographic Monitoring Area (DMA). This will require careful coordination and collaboration to effectively manage bears which do not recognize jurisdictional boundaries. The NPS is committed to working closely and collaboratively with the USFWS and our other partners to develop and implement a cooperative management framework for this wide-ranging species while recognizing and respecting each partner's jurisdiction, mission, values and interests. The NPS continues to focus on supporting the delisting process while trying to ensure values of the NPS are considered in management strategies and actions.	1100		Post-delisting monitoring and management	United States Department of the Interior NATIONAL PARK SERVICE INTERMOUNTAIN REGION 12795 West Alameda Parkway P.O. Box 25287 Denver, Colorado 80225-0287 May 10, 2016 VIA ELECTRONIC MAIL NATIONAL PARK SERVICE Subject: NPS Comments on Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife and Final Draft 2016 Conservation Strategy, Docket ID: FWS-R6-ES-2016-0042 The National Park Service (NPS) appreciates the opportunity to provide comments on the Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife and the associated draft Conservation Strategy. The attached review comments were prepared by staff from Yellowstone National Park (YELL), Grand Teton National Park (GRTE), John D. Rockefeller Jr. Memorial Parkway (JODR), and NPS Regional and Washington Offices. NPS reviewers noted that the U.S. Fish and Wildlife Service (USFWS) has done an excellent job of structuring the argument for delisting of the Greater Yellowstone Ecosystem (GYE) population of grizzly bears and that the state of the science is well presented. Upon delisting of the GYE grizzly bear, the states of Wyoming, Montana, and Idaho along with the NPS, U.S. Forest Service (USFS), Bureau of Land Management (BLM) and tribes will collectively co-manage this species and habitat within the identified Demographic Monitoring Area (DMA). This will require careful coordination and collaboration to effectively manage bears which do not recognize jurisdictional boundaries. The NPS is committed to working closely and collaboratively with the USFWS and our other partners to develop and implement a cooperative management framework for this wide-ranging species while recognizing and respecting each partner's jurisdiction, mission, values and interests. The NPS continues to focus on supporting the delisting process while trying to ensure values of the NPS are considered in management strategies and actions. Grizzly bears are a premier wildlife attraction for visitors to YELL, GRTE and JODR; and those visitors bring tens of millions of dollars into the regional economy. The bears contribute to the public enjoyment and sense of pride in our conservation heritage. We seek to ensure that any future grizzly bear harvests within the GYE be conducted in a manner that: 1) respects the NPS mission; 2) protects regional economic benefits and the enjoyment of bear watching; 3) reduces the risks associated with wounded bears entering NPS units; and 4) limits the likelihood that well-known or transboundary bears will be harvested. The attached NPS comments on the Proposed Rule and draft Conservation Strategy reflect many of the same key issues or themes that the NPS raised during the April 2016 Interagency Grizzly Bear Committee Yellowstone Ecosystem Subcommittee (IGBC-YES) meeting in West Yellowstone and during the September 2015 interagency meeting in Idaho Falls. Those key issues include: 1. If, after delisting, the decision is made to hunt grizzly bears, NPS is requesting that states focus the majority of future grizzly bear harvests away from park boundaries. In addition, NPS is requesting that harvests be focused in areas where human-bear conflicts are prevalent. 2. NPS is requesting that NPS representatives be included in the discussions and contribute to the development of recommendations during the annual meetings referred to in the draft Memorandum of Agreement (MOA) among the three states, recognizing that the decisions made during these meetings ultimately inform the discretionary mortality allocation by the states. 3. NPS is requesting that the Proposed Rule, Conservation Strategy, state management plans and other related documents identify the John D. Rockefeller, Jr. Memorial Parkway (JODR) as one of the three national park units in the GYE where hunting will not be permitted. 4. NPS is requesting that if a new estimation model other than Chao2 is used in the future, the states will recalibrate the population thresholds (i.e., minimum and average numbers of bears) and proportions of allocated hunter harvest based on the estimates provided by the new model in comparison to Chao2. We look forward to working with the USFWS and other members of IGBC-YES to ensure that these issues are addressed in the Proposed Rule, Conservation Strategy and/or state grizzly bear management plans, as appropriate. The NPS is committed to working collaboratively with our state, federal and tribal partners to develop and implement a cooperative framework for successful management of the GYE grizzly bear population upon delisting of this iconic species. Thank you again for the opportunity to provide comments. Sue E. Masica Superintendent, Yellowstone National Park Associate Director, Natural Resource Stewardship and Science Attachment	FWS-R6-ES-2016-0042-5325	

Grizzly bears are a premier wildlife attraction for visitors to YELL, GRTE and JODR; and those visitors bring tens of millions of dollars into the regionaleconomy. The bears contribute to the publicâ€™s enjoyment and sense of pride in our conservation heritage. We seek to ensure that any future grizzly bear harvests within the GYE be conducted in a manner that: 1)respects the NPS mission; 2) protects regional economic benefits and the enjoyment of bear watching; 3) reduces the risks associated with wounded bears entering NPS units; and 4) limits the likelihood thatwell-known or transboundary bears will be harvested.			Post-delisting monitoring and management	United States Department of the Interior zi -Â» NATIONAL PARK SERVICE â€œ' â€œ"Â"E INTERMOUNTAIN REGION Â· i . , Â» 12795 West Alameda Parkway Q P.O. Box 25287 Denver, Colorado 80225-0287 ru REPLY REFER ro;May 10, 2016 VIA ELECTRONIC MAIL â€" NO HARD COPY TO FOLLOW MemorandumTo: Director, U.S. Fish & Wildlife Service From: Intermountain Regional Director, National Park Service Subject: NPS Comments on Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlde and Final Draft 2016 Conservation Strategy, Docket ID: FWS-R6â€"ES-2016-0042 The National Park Service (NPS) appreciates the opportunity to provide comments on the Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife and the associated draft Conservation Strategy. The attached review comments were prepared by staff from Yellowstone National Park (YELL), Grand Teton National Park (GRTE), John D. Rockefeller Jr. Memorial Parkway (JODR), and NPS Regional and Washington Offices. 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The NPS continues to focus on supporting the delisting process while trying to ensure values of the NPS are considered in management strategies and actions. Grizzly bears are a premier wildlife attraction for visitors to YELL, GRTE and JODR; and those visitors bring tens of millions of dollars into the regional economy. The bears contribute to the publicâ€™s enjoyment and sense of pride in our conservation heritage. We seek to ensure that any future grizzly bear harvests within the GYE be conducted in a manner that: 1) respects the NPS mission; 2) protects regional economic benefits and the enjoyment of bear watching; 3) reduces the risks associated with wounded bears entering NPS units; and 4) limits the likelihood that well-known or transboundary bears will be harvested. 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NPS is requesting that NPS representatives be included in the discussions and contribute to the development of recommendations during the annual meetings referred to in the draft Memorandum of Agreement (MOA) among the three states, recognizing that the decisions made during these meetings ultimately inform the discretionary mortality allocation by the states. 3. NPS is requesting that the Proposed Rule, Conservation Strategy, state management plans and other related documents identify the John D. Rockefeller, Jr. Memorial Parkway (JODR) as one of the three national park units in the GYE where hunting will not be permitted. 4. NPS is requesting that if a new estimation model other than Chao2 is used in the future, the states will recalibrate the population thresholds (i.e., minimum and average numbers of bears) and proportions of allocated hunter harvest based on the estimates provided by the new model in comparison to Chao2. We look forward to working with the USFWS and other members of IGBCâ€™YES to ensure that these l issues are addressed in the Proposed Rule, Conservation Strategy and/or state grizzly bear management plans, as appropriate. The NPS is committed to working collaboratively with our state, federal and tribal partners to develop and implement a cooperative framework for successful management of the GYE grizzly bear population upon delisting of this iconic species. Thank you again for the opportunity to provide comments. Â© Sue E. Masica cc:Superintendent, Yellowstone National Park Superintendent, Grand Teton National Park Associate Director, Natural Resource Stewardship and Science Associate Regional Director, Resource Stewardship and Science, Intermountain Region Attachment	FWS-R6-ES-2016-0042-5325	

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Box 25287 Denver, Colorado 80225-0287 May 10, 2016 VIA ELECTRONIC MAIL NO HARD COPY TO FOLLOW Memorandum To: Director, U.S. Fish & Wildlife Service From: Intermountain Regional Director, National Park Service Subject: NPS Comments on Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife and Final Draft 2016 Conservation Strategy, Docket ID: FWS-R6-ES-2016-0042 The National Park Service (NPS) appreciates the opportunity to provide comments on the Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife and the associated draft Conservation Strategy. The attached review comments were prepared by staff from Yellowstone National Park (YELL), Grand Teton National Park (GRTE), John D. Rockefeller Jr. Memorial Parkway (JODR), and NPS Regional and Washington Offices. NPS reviewers noted that the U.S. Fish and Wildlife Service (USFWS) has done an excellent job of structuring the argument for delisting of the Greater Yellowstone Ecosystem (GYE) population of grizzly bears and that the state of the science is well presented. Upon delisting of the GYE grizzly bear, the states of Wyoming, Montana, and Idaho along with the NPS, U.S. Forest Service (USFS), Bureau of Land Management (BLM) and tribes will collectively co-manage this species and habitat within the identified Demographic Monitoring Area (DMA). This will require careful coordination and collaboration to effectively manage bears which do not recognize jurisdictional boundaries. The NPS is committed to working closely and collaboratively with the USFWS and our other partners to develop and implement a cooperative management framework for this wide-ranging species while recognizing and respecting each partner's jurisdiction, mission, values and interests. The NPS continues to focus on supporting the delisting process while trying to ensure values of the NPS are considered in management strategies and actions. Grizzly bears are a premier wildlife attraction for visitors to YELL, GRTE and JODR; and those visitors bring tens of millions of dollars into the regional economy. The bears contribute to the public enjoyment and sense of pride in our conservation heritage. We seek to ensure that any future grizzly bear harvests within the GYE be conducted in a manner that: 1) respects the NPS mission; 2) protects regional economic benefits and the enjoyment of bear watching; 3) reduces the risks associated with wounded bears entering NPS units; and 4) limits the likelihood that well-known or transboundary bears will be harvested. 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To repeat--to turn management of the Yellowstone grizzlies over to the states will assure that all the investment of time and money up to now toward recovering these bears will be for naught and we will have snatched "defeat right out of the jaws of victory".	1100		Post-delisting monitoring and management	I oppose the proposed Yellowstone Grizzly Bear Delisting Rule removing the bear from the protections of the Endangered Species Act at this time. I oppose this proposal because the Yellowstone grizzly lives on an island. This island has been isolated from other bear populations for over 100 years. As of this date the bears are still isolated from other populations and there is no provision in this delisting proposal to assure protected linkage habitat to other populations. In fact, the reverse is currently taking place with the US Sheep Experimental Station in the Centennial Mountains of Montana/Idaho still insisting that they must run sheep in this important linkage zone between Yellowstone and the vast central Idaho Wildlands (read their current EIS). The Sheep Station insistence that domestic sheep must take precedence over public wildlife helps insure that the Yellowstone bears will remain on an island. I oppose this proposal because there is still no secure grizzly population in the vast Central Idaho Wildlands even though plans were prepared some 20 years ago to translocate suitable bears into Idaho. This population will be essential to link up with the Yellowstone bears and more northern bear populations to form a truly recovered meta-population of grizzlies in the Lower 48. Until we have such an Idaho population I will know that the USFWS is not serious about achieving true Yellowstone grizzly recovery and I will continue to oppose a Delisting Rule. I oppose this proposal because it will grant the states the right to begin to systematically target grizzlies attempting to recolonize former occupied habitat outside of a "Demographic Monitoring Area" for trophy sport hunts and this will guarantee that true grizzly recovery will be stopped in its tracks. A wide ranging top-level opportunistic omnivore such as the grizzly can not be turned over to the provincial interests of the livestock driven agendas of the state game departments of Wyoming, Idaho and Montana. I oppose this proposal because it does not take into account the unavoidable declining food resources in the Yellowstone core that will accompany the global climate change that is now underway. The grizzlies are adaptable but we must give them the room to adapt in the face of climate change. The State of Wyoming has no intention of giving them that room. The best scenario that this will result from the Delisting Rule is maintenance of a relic population of bears but it can not and will achieve true Yellowstone grizzly bear recovery. The bears must be allowed to disperse into all biologically suitable habitat. An example--The Wyoming Range likely has some of the best bear habitat in the Greater Yellowstone Ecosystem. Because of livestock political power the State of Wyoming considers any bears who attempt to recolonize this superb habitat to be expendable and, beyond doubt, they will be high on the list for trophy, sport hunts. To repeat--to turn management of the Yellowstone grizzlies over to the states will assure that all the investment of time and money up to now toward recovering these bears will be for naught and we will have snatched "defeat right out of the jaws of victory". Now is not the time to turn back. I oppose this premature Proposed Rule for Yellowstone Grizzly Bear Delisting from the Endangered Species Act.	FWS-R6-ES-2016-0042-1109	
NPS is requesting that the Proposed Rule, Conservation Strategy, state management plans and other related documents identify the John D. Rockefeller, Jr. Memorial Parkway (JODR) as one of the three national park units in the GYE where hunting will not be permitted.			Post-delisting monitoring and management	United States Department of the Interior NATIONAL PARK SERVICE 12795 West Alameda Parkway P.O. Box 25287 Denver, Colorado 80225-0287 REPLY REFERENCE: May 10, 2016 VIA ELECTRONIC MAIL NO HARD COPY TO FOLLOW Memorandum To: Director, U.S. Fish & Wildlife Service From: Intermountain Regional Director, National Park Service Subject: NPS Comments on Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife and Final Draft 2016 Conservation Strategy, Docket ID: FWS-R6-ES-2016-0042 The National Park Service (NPS) appreciates the opportunity to provide comments on the Proposed Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife and the associated draft Conservation Strategy. The attached review comments were prepared by staff from Yellowstone National Park (YELL), Grand Teton National Park (GRTE), John D. Rockefeller Jr. Memorial Parkway (JODR), and NPS Regional and Washington Offices. NPS reviewers noted that the U.S. Fish and Wildlife Service (USFWS) has done an excellent job of structuring the argument for delisting of the Greater Yellowstone Ecosystem (GYE) population of grizzly bears and that the state of the science is well presented. Upon delisting of the GYE grizzly bear, the states of Wyoming, Montana, and Idaho along with the NPS, U.S. Forest Service (USFS), Bureau of Land Management (BLM) and tribes will collectively co-manage this species and habitat within the identified Demographic Monitoring Area (DMA). This will require careful coordination and collaboration to effectively manage bears which do not recognize jurisdictional boundaries. The NPS is committed to working closely and collaboratively with the USFWS and our other partners to develop and implement a cooperative management framework for this wide-ranging species while recognizing and respecting each partner's jurisdiction, mission, values and interests. The NPS continues to focus on supporting the delisting process while trying to ensure values of the NPS are considered in management strategies and actions. Grizzly bears are a premier wildlife attraction for visitors to YELL, GRTE and JODR; and those visitors bring tens of millions of dollars into the regional economy. The bears contribute to the public's enjoyment and sense of pride in our conservation heritage. We seek to ensure that any future grizzly bear harvests within the GYE be conducted in a manner that: 1) respects the NPS mission; 2) protects regional economic benefits and the enjoyment of bear watching; 3) reduces the risks associated with wounded bears entering NPS units; and 4) limits the likelihood that well-known or transboundary bears will be harvested. The attached NPS comments on the Proposed Rule and draft Conservation Strategy reflect many of the same key issues or themes that the NPS raised during the April 2016 Interagency Grizzly Bear Committee Yellowstone Ecosystem Subcommittee (IGRC-YES) meeting in West Yellowstone and during the September 2015 interagency meeting in Idaho Falls. Those key	FWS-R6-ES-2016-0042-5325	

				subcommittee (page 14) meeting in West Yellowstone and during the September 2012 emergency meeting in Idaho Falls. Those key issues included: 1. If, after delisting, the decision is made to hunt grizzly bears, NPS is requesting that states focus the majority of future grizzly bear harvests away from park boundaries. In addition, NPS is requesting that harvests be focused in areas where human-bear conflicts are prevalent. 2. NPS is requesting that NPS representatives be included in the discussions and contribute to the development of recommendations during the annual meetings referred to in the draft Memorandum of Agreement (MOA) among the three states, recognizing that the decisions made during these meetings ultimately inform the discretionary mortality allocation by the states. 3. NPS is requesting that the Proposed Rule, Conservation Strategy, state management plans and other related documents identify the John D. Rockefeller, Jr. Memorial Parkway (JODR) as one of the three national park units in the GYE where hunting will not be permitted. 4. NPS is requesting that if a new estimation model other than Chao2 is used in the future, the states will recalibrate the population thresholds (i.e., minimum and average numbers of bears) and proportions of allocated hunter harvest based on the estimates provided by the new model in comparison to Chao2. We look forward to working with the USFWS and other members of IGBC to ensure that these issues are addressed in the Proposed Rule, Conservation Strategy and/or state grizzly bear management plans, as appropriate. The NPS is committed to working collaboratively with our state, federal and tribal partners to develop and implement a cooperative framework for successful management of the GYE grizzly bear population upon delisting of this iconic species. Thank you again for the opportunity to provide comments. Â© Sue E. Masica cc:Superintendent, Yellowstone National Park Superintendent, Grand Teton National Park Associate Director, Natural Resource Stewardship and Science Associate Regional Director, Resource Stewardship and Science, Intermountain Region Attachment		
Montana's plan is to charge only \$50 for in state licenses and a \$1,000 for out-of-state. These low costs will ensure their decimation, not to mention the fact that they are not used to being hunted making them an easy target. The time it takes for them to mature sexually and only reproduce every two to three years will greatly increase their reduction should de-listing occur.	1100		Post-delisting monitoring and management	It is with great sadness and frustration to hear about the possible de-listing of grizzly bears in the greater Yellowstone eco-system. First I would like to address the issue from the perspective of a native of Wyoming. My life began on a large ranch nestled along the Beartooth Mountains reaching into Sunlight Basin north of Cody, WY close to the Montana border. During my childhood, I encountered an extraordinary plethora of wildlife including the grizzly. My parents taught me the value and necessity of living with, not against nature. In order for humanity to have a connection to the earth, there must be respect and love for all things wild and free. Predation was a part of doing business as a rancher and if you were not smart enough or creative enough to deal with predators, then you had no business being a rancher. And true to their wisdom, we experienced very little predation. More livestock was lost to injury and illness than wildlife predation. Throughout all my childhood years, I learned to understand wildlife and respect their ways. Ultimately learning how to alter my own behavior in order to interact safely. Not a hardship, sometimes a short delay or detour, but nothing that would ever cause my parents a willingness to take the life of a bear, coyote, cougar, bobcat, fox, etc. for convenience's sake. Fast forward to my life as a wildlife biologist and it is with a grateful heart that they taught me the value of all nature and it's ways. It is from their lifelong commitment to harmony, balance, and respect for all life that I long to protect the last vestiges of the wild. It is poor science that calls for the slaughter of these magnificent creatures. And slaughter it will be. Montana's plan is to charge only \$50 for in state licenses and a \$1,000 for out-of-state. These low costs will ensure their decimation, not to mention the fact that they are not used to being hunted making them an easy target. The time it takes for them to mature sexually and only reproduce every two to three years will greatly increase their reduction should de-listing occur. Their value is far greater alive than on someone's wall or under their feet. I recall a funny comment made to Yellowstone rangers about training the bears better so that visitors will be able to see them. Not so funny when you think about how much money wildlife engenders for the park and the surrounding businesses. And bears are iconic, everyone who enters a park where they remain wish to see one and to feel their wildness. There is no good reason to de-list these bears and especially not for political maneuvering. It is our responsibility, collectively to keep these icons safe. As anyone who works in science and law enforcement can tell you, the amount of "Shoot, shovel, and shut up," has an already significant impact in every aspect of wildlife. We must not allow the wanton destruction of grizzlies a further opportunity to take hold. Stand firm in choosing to retain the grizzly on the endangered species list where they at least have some protections. Thank you for your time and consideration.	FWS-R6-ES-2016-0042-5376	

The grizzly population of the Yellowstone ecosystem is isolated from all other grizzly populations (pp. 13190-13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. x Accurately estimating the number of bears in the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGBST to estimate bear population numbers have been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review. A There has been a lack of transparency about making taxpayer funded data (for which the IGBST have maintained an exclusive monopoly) available for scrutiny by the larger scientific community. All raw data on grizzly bears collected by government agencies should be made available to independent scientists. In view of the wide disagreement about delisting decisions, the USFWS should establish a review panel of independent, academically qualified scientists who are not involved in current grizzly bear research in the GYE. A			Post-delisting monitoring and management	I oppose delisting of the Yellowstone population of grizzly bears. The species should not be removed from the Federal List of Endangered and Threatened Wildlife. In 2015, approximately 70 bears died. This represents about 10% of the total population for the slowest reproducing mammal in North America. This mortality rate is not sustainable. The 10% rate occurred even with federal protection of the Threatened and Endangered Species act. Removing such protection and placing it with Idaho, Montana, and Wyoming is incompatible with a sustainable population. These three states have clearly demonstrated hostility to co-existence with large carnivores and seem to view them only as unwanted pests or a commodity for revenue through hunting licenses, etc. Demonstrated, real-world sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Climate change effects on Yellowstone's grizzlies are dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. Four critical foods make up the diet of grizzlies in the Yellowstone ecosystem: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. The expanding range of Yellowstone's grizzlies is depicted in The Rule as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). A more reasonable hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement for "best science" as required by law. The grizzly population of the Yellowstone ecosystem is isolated from all other grizzly populations (pp. 13190-13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Accurately estimating the number of bears in the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review. There has been a lack of transparency about making taxpayer funded data (for which the IGBST have maintained an exclusive monopoly) available for scrutiny by the larger scientific community. All raw data on grizzly bears collected by government agencies should be made available to independent scientists. In view of the wide disagreement about delisting decisions, the USFWS should establish a review panel of independent, academically qualified scientists who are not involved in current grizzly bear research in the GYE.	FWS-R6-ES-2016-0042-5355	
FWS claims that it will be involved in management of and protecting the grizzly population after delisting. However, Montana has already decided to allow trophy hunting for grizzlies. Idaho, Montana, and Wyoming have shown themselves to be hostile towards predators, with little attempt to prosecute poaching, and only minor penalties for poachers who are prosecuted.	1100		Post-delisting monitoring and management	I strongly oppose the delisting of Grizzly Bears in the Greater Yellowstone Ecosystem. FWS claims that it will be involved in management of and protecting the grizzly population after delisting. However, Montana has already decided to allow trophy hunting for grizzlies. Idaho, Montana, and Wyoming have shown themselves to be hostile towards predators, with little attempt to prosecute poaching, and only minor penalties for poachers who are prosecuted. You claim that there are enough grizzlies (700) in the Greater Yellowstone Ecosystem to delist them. How was the number of 700 arrived at, and by whom? Has this number been confirmed by an independent researcher, and if so, by whom? Dr. David Mattson, who has studied grizzlies and mountain lions for the last 35 years, 15 of which were intensive field study in Yellowstone, disagrees with this assessment. Even IF your estimate is accurate, the population is still in danger. Whitebark pine is being killed off due to climate change, which removes a major food source for the grizzlies, A report by the Interagency Grizzly Bear Study Team that concludes that whitebark pine is not essential to the bears is conceptually flawed, with a bias towards a political agenda, and flatly contradicts an overwhelming body of earlier government research which demonstrated the importance of whitebark pine to the grizzly population. Other major food sources of the grizzly are stressed - cutthroat trout by invasives, and cutworm moths by pesticide use. The decrease in availability of food sources will result in healthier bears, greater mortality, and decreased fertility, all of which will lead to a decline in the bear population. Coming back from any population decline will be difficulty for grizzlies, since the females only give birth every 3 years. Lastly, regarding claims that the Greater Yellowstone Grizzly has recovered enough range to be delisted - Under the Endangered Species Act, species must be treated as a whole. The Yellowstone Ecosystem population is no different biologically than other grizzlies in the Northern Continental Divide region. Therefore, you have no legal authority to delist the grizzly in the Greater Yellowstone Ecosystem. Please remember that the wildlife of this nation does not belong to the state Fish and Game Departments, nor to special interest groups such as hunters and outfitters, but to the people of this nation. Thank you for your consideration of my opinion.	FWS-R6-ES-2016-0042-5377	

a commitment to habitat connectivity for bear migrations and genetic diversity -- managing the GYE population as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management.	1100		Post-delisting monitoring and management	I am very wary of the proposal to delist the GYE population of grizzly bears from the federal list of endangered wildlife. If the delisting does indeed proceed forward, it should be done with great caution in favor of the grizzlies' continued chance of survival and thriving. I strongly support the following provisions in the delisting rule: -- protecting the bear's core habitat, with meaningful and enforceable habitat protections, including limits on development and roads. -- maintaining a stable population, without arbitrary reductions in the number of bears and a strong commitment from Montana, Idaho, and Wyoming to reduce conflicts between people and bears. -- a commitment to habitat connectivity for bear migrations and genetic diversity -- managing the GYE population as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. Grizzly bears are a magnificent creature and any ecosystem that has healthy populations of them is very fortunate on multiple levels. Where I live, in the North Cascades, the grizzlies are missing and we are working hard to get them back. Thank you for careful consideration of the above recommendations when moving forward in the GYE.	FWS-R6-ES-2016-0042-1250	
In order for this success story to continue into the future, we believe that strong state-based conservation planning must be in place. While there may be a time in the near future where de-listing could happen, we do not believe the necessary sideboards are in place now for that to occur. In addition to needed amendments to state-based grizzly bear management policy, federal land management plans also need to be updated to mitigate risks to grizzly bears from human caused mortality and livestock conflict. Until these two things happen, we advise the U.S Fish and Wildlife Service (USFWS) to not de-list the Yellowstone grizzly bear.			Post-delisting monitoring and management	See attached file for full comment letter. Summary: Since 1973, the Idaho Conservation League (ICL) has been Idaho's voice for clean water, clean air and public lands. The Idaho Conservation League works to protect these values through education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters who have a deep personal interest in protecting our land, water, fish, and wildlife. The Yellowstone grizzly is an iconic carnivore that is important to many Idahoans as well as many Americans. The continued preservation of this species is imperative for a functioning and healthy Greater Yellowstone Ecosystem. The restoration of the Yellowstone grizzly bear from an estimated 138 individuals to a now estimated 700 individuals represents a success story for the Endangered Species Act. Without the concerted effort from federal, state, and tribal wildlife management entities, this success would not have been possible. In order for this success story to continue into the future, we believe that strong state-based conservation planning must be in place. While there may be a time in the near future where de-listing could happen, we do not believe the necessary sideboards are in place now for that to occur. In addition to needed amendments to state-based grizzly bear management policy, federal land management plans also need to be updated to mitigate risks to grizzly bears from human caused mortality and livestock conflict. Until these two things happen, we advise the U.S Fish and Wildlife Service (USFWS) to not de-list the Yellowstone grizzly bear. Attachments ICL comments on USFWS proposal to delist Yellowstone grizzly bear	FWS-R6-ES-2016-0042-5391	
There are not adequate existing regulatory mechanisms taking place outside the ESA. For example, the state of Wyoming's plan states that they will not let the demographic of the bears drop below 500 individuals. This would mean the population could potentially lose at least 30% of its current members, not including the estimates that the population doubles every two years. That substantially decreases not only the current and future population but the genetic diversity as well. The goal of the Endangered Species Act is to recover individuals to a level where they can sustain their population and increase in numbers for the futures. The current proposal to delist encourages the reduction of the population to a precarious level			Post-delisting monitoring and management	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	
- BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections.			Post-delisting monitoring and management	There are many reasons I feel that this rule should not be passed, below are the most important ones to me. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. These states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. Every animal on this planet was put here by GOD and DESERVES to be here. Granted not everyone cares about this but remember animals have been here as long if not longer than humans. They are not destroying this planet humans ARE - BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. Many people are so obsessed with KILLING that they don't care about what they are doing to the future of this planet or what kind of world the future generations are going to be left with. - MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. I am tired of the MAJORITY desire of this country being thrown aside.	FWS-R6-ES-2016-0042-1415	

The USFWS proposal to delist the grizzly not only puts a stop to this recovery, it will quickly QUICKLY reverse it. This would turn management of this iconic species over to the states and subject these animals to trophy hunting seasons in Montana, Idaho and Wyoming. Removing federal protections from this one small, isolated population and immediately hunting them will likely start an immediate decline back towards extinction. We do not recover species from the ESA, to delist and immediately begin hunting them. This is not the intention of the Endangered Species Act.			Post-delisting monitoring and management	_____ Grizzly bears in the Greater Yellowstone Ecosystem have benefited greatly from ESA protections but are not even close to fully recovered in the area, and are very vulnerable. It has taken 40 years of protections to get the population where it is. Losing ESA protections means they would be immediately hunted Grizzliehunters, which would set population numbers in an immediate decline. The USFWS proposal to delist the grizzly not only puts a stop to this recovery, it will quickly QUICKLY reverse it. This would turn management of this iconic species over to the states and subject these animals to trophy hunting seasons in Montana, Idaho and Wyoming. Removing federal protections from this one small, isolated population and immediately hunting them will likely start an immediate decline back towards extinction. We do not recover species from the ESA, to delist and immediately begin hunting them. This is not the intention of the Endangered Species Act. The ESA is not a game farm plan. The purpose of the ESA is to protect and recover imperiled species and the ecosystems upon which they depend. It was designed to protect critically imperiled species from extinction as a "consequence of economic growth and development untempered by adequate concern and conservation." The U.S. Supreme Court found that "the plain intent of Congress in enacting" the ESA "was to halt and reverse the trend toward species extinction, whatever the cost. To delist species, several factors are considered: the threats are eliminated or controlled, population size and growth, and the stability of habitat quality and quantity. The threats are not eliminated nor controlled, but greater than ever. Habitat quality and quantity are currently unstable, and further unsustainable if delisted. The direct and indirect threats to the grizzly are enormous. The loss of key food sources due to climate change, slow reproductive rates, and the fact that the state plans to "manage" and "reduce" numbers through trophy hunts guarantee an unsustainable future for the species. The American public overwhelmingly wants grizzly bears protected for future generations, not killed by a few trophy hunters. Grizzly bears are a wildlife icon that have been a part of the American West and been integral to the Yellowstone region for centuries. Each year, visitors spend millions in the region, hoping to catch a glimpse of a grizzly, this beautiful and powerful symbol of our wild heritage. And as an apex predator, their presence is crucial to the health of wildlife in the Greater Yellowstone region. If the delisting goes through, the very states Wyoming, Montana, and Idaho that had their management authority over grizzlies taken away for failing to keep their populations healthy will again assume primary custodial care. Due to the extreme hostility towards wildlife predators, Wyoming's treatment of other delisted predators, namely wolves, and state policies allow wolves to be killed for any reason over 85% of the state. In the latest grizzly recovery plan, the bears are strictly protected in the core of the park, but there are very liberal hunting policies just barely outside the park and lethal control if they encounter livestock on public lands. The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, (cutthroat trout and especially Whitebark Pine) diminish. There are too many unknowns in climate/food source/habitat right now. The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (Gray Wolves). Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. Population will no longer be allowed to grow - population is now being managed for stability, not growth. We just spent millions of dollars and it has taken 40 years to increase the bear population from 125 to 725 (demonstrating the length of time for reproduction) With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting?	FWS-R6-ES-2016-0042-1424	
Also, the plan talks about waiting for THREE years of lowered bear population before action is taken. With what I know about the difficult and slow reproductive rates of these bears, I consider THREE years too long without a response by a management team. After all, it took grizzly bears 40 years to raise their numbers to only about 700.	1103		Post-delisting monitoring and management	I am a proud American and value what makes this country unique, including our land and wildlife. After hearing of the debate about Grizzly Bear delisting, not only was I disappointed, but angry. Angry because, once again, it seems those who are paid by American citizens to manage and protect our countries treasures are bowing to some wealthy political lobbyists. We have torn down forests, paved over habitat, wiped out entire species, and built our capitalist shrines throughout this nation. It is past time to reign in our greed and arrogance. It is time to take pride in this country's life. Delisting will only bring hunts... And hunts contributed to the grizzly numbers dropping to less than 200 in the 70s. I DO NOT SUPPORT DELISTING the grizzly or the Yellowstone Draft Plan due to the lack of protection offered to the great Grizzly Bear. These bears need to travel to find mates. How can this species not only survive, but thrive, when their gene pool is so isolated? They need to be able to travel to find mates who offer gene diversity without the threat of hunters, habitat loss, or disgruntled ranchers. These bears should be able to expand their territory to sustain their species without human threat. These ranchers need to man up... Stop blaming the bear and wolves for trying to survive on what little land we've left for them. Ranchers are the intruders. They need to take more precautions before taking out their rifles on my land. This is PUBLIC LAND PAID FOR BY TAXPAYERS and most of us want the wildlife to stay in tact. Also, the plan talks about waiting for THREE years of lowered bear population before action is taken. With what I know about the difficult and slow reproductive rates of these bears, I consider THREE years too long without a response by a management team. After all, it took grizzly bears 40 years to raise their numbers to only about 700. While the plan does not mention an intended grizzly hunt, I can only guess it's impending. I do not support a hunt at this time especially in or AROUND Yellowstone. And definitely not in any area that interrupts the bears' passage to find mates. And if you allow hunts, how will hunters differentiate between males and mothers with cubs that depend on her for survival? Or will they even care? Starving, motherless cubs is not acceptable. This plan is no plan without addressing these points. Please consider my words while remembering the dire state of the world's wildlife. Be part of the solution. With deep concern, Ang Sutton	FWS-R6-ES-2016-0042-1373	

HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. These states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains.	1100		Post-delisting monitoring and management	Do NOT delist the Yellowstone Grizzlies! - THE PROPOSED RULE DOES NOT ADDRESS GENETIC ISOLATION OF YELLOWSTONE POPULATION: The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. - DECLINING FOOD SOURCES: Historically bears dependent on 4 food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. These states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. - GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. Sow's will be killed and Cubs left to starve or be killed by predators. Don't delist the Grizzlies. Too many of them are being killed even with protection. There is no reason to delist them. Do you really want the states to lose millions of tourist dollars? That's what will happen because millions of people come to the Tetons and Yellowstone to see the Grizzlies. If they are hunted they won't be seen in the parks like they are now. To delist them is totally wrong on so many levels.	FWS-R6-ES-2016-0042-1366	
Due to the extreme hostility towards wildlife predators, Wyoming's treatment of other delisted predators, namely wolves, and state policies allow wolves to be killed for any reason over 85% of the state. In the latest grizzly recovery plan, the bears are strictly protected in the core of the park, but there are very liberal hunting policies just barely outside the park and lethal control if they encounter livestock on public lands.			Post-delisting monitoring and management	_____ Grizzly bears in the Greater Yellowstone Ecosystem have benefited greatly from ESA protections but are not even close to fully recovered in the area, and are very vulnerable. It has taken 40 years of protections to get the population where it is. Losing ESA protections means they would be immediately hunted Grizzliehunters, which would set population numbers in an immediate decline. The USFWS proposal to delist the grizzly not only puts a stop to this recovery, it will quickly QUICKLY reverse it. This would turn management of this iconic species over to the states and subject these animals to trophy hunting seasons in Montana, Idaho and Wyoming. Removing federal protections from this one small, isolated population and immediately hunting them will likely start an immediate decline back towards extinction. We do not recover species from the ESA, to delist and immediately begin hunting them. This is not the intention of the Endangered Species Act. The ESA is not a game farm plan. The purpose of the ESA is to protect and recover imperiled species and the ecosystems upon which they depend. It was designed to protect critically imperiled species from extinction as a "consequence of economic growth and development untempered by adequate concern and conservation." The U.S. Supreme Court found that "the plain intent of Congress in enacting" the ESA "was to halt and reverse the trend toward species extinction, whatever the cost. To delist species, several factors are considered: the threats are eliminated or controlled, population size and growth, and the stability of habitat quality and quantity. The threats are not eliminated nor controlled, but greater than ever. Habitat quality and quantity are currently unstable, and further unsustainable if delisted. The direct and indirect threats to the grizzly are enormous. The loss of key food sources due to climate change, slow reproductive rates, and the fact that the state plans to "manage" and "reduce" numbers through trophy hunts guarantee an unsustainable future for the species. The American public overwhelmingly wants grizzly bears protected for future generations, not killed by a few trophy hunters. Grizzly bears are a wildlife icon that have been a part of the American West and been integral to the Yellowstone region for centuries. Each year, visitors spend millions in the region, hoping to catch a glimpse of a grizzly, this beautiful and powerful symbol of our wild heritage. And as an apex predator, their presence is crucial to the health of wildlife in the Greater Yellowstone region. If the delisting goes through, the very states Wyoming, Montana, and Idaho that had their management authority over grizzlies taken away for failing to keep their populations healthy will again assume primary custodial care. Due to the extreme hostility towards wildlife predators, Wyoming's treatment of other delisted predators, namely wolves, and state policies allow wolves to be killed for any reason over 85% of the state. In the latest grizzly recovery plan, the bears are strictly protected in the core of the park, but there are very liberal hunting policies just barely outside the park and lethal control if they encounter livestock on public lands. The population/gene-pool is too small and disjointed. 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It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. Population will no longer be allowed to grow - population is now being managed for stability, not growth. We just spent millions of dollars and it has taken 40 years to increase the bear population from 125 to 725 (demonstrating the length of time for reproduction) With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting?	FWS-R6-ES-2016-0042-1424	

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The American public overwhelmingly wants grizzly bears protected for future generations, not killed by a few trophy hunters. Grizzly bears are a wildlife icon that have been a part of the American West and been integral to the Yellowstone region for centuries. Each year, visitors spend millions in the region, hoping to catch a glimpse of a grizzly, this beautiful and powerful symbol of our wild heritage. And as an apex predator, their presence is crucial to the health of wildlife in the Greater Yellowstone region. If the delisting goes through, the very states Wyoming, Montana, and Idaho that had their management authority over grizzlies taken away for failing to keep their populations healthy will again assume primary custodial care. Due to the extreme hostility towards wildlife predators, Wyoming's treatment of other delisted predators, namely wolves, and state policies allow wolves to be killed for any reason over 85% of the state. 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It seems odd that the US Fish and Wildlife wants to reintroduce bears in the North Cascades of Washington State to ensure a genetically viable population, and at the same time, allow the remaining small population of grizzlies in Yellowstone Park to be hunted and killed by trophy hunters. This is not a logical decision.			Post-delisting monitoring and management	I am opposed to the plan of US Fish and Wildlife Service to delist Yellowstone bears from federal protection and further to allow trophy hunts on Yellowstone area grizzly bears. These magnificent animals are a keystone species in Yellowstone Park, and represent the kind of wild beauty that is quickly disappearing from the earth. Millions of Americans treasure the experience of seeing these amazing animals in their natural world, and millions of visitors from countries around the world also value these animals. Further, it makes no sense to delist Yellowstone grizzly bears under the Endangered Species Act inasmuch as wildlife biologists now recognize that biologically, grizzly populations have a very slow reproductive rate...statists show that fewer than 2,000 grizzlies exist in the continental states (down from 50,000 in the 19th century), also climate change, invasive species, and pesticide use make it harder for these animals to reproduce. It seems odd that the US Fish and Wildlife wants to reintroduce bears in the North Cascades of Washington State to ensure a genetically viable population, and at the same time, allow the remaining small population of grizzlies in Yellowstone Park to be hunted and killed by trophy hunters. This is not a logical decision. I urge the US Fish and Wildlife Service not to yield to pressure from special interest groups to desire to hunt, kill, and maim grizzly bears in Yellowstone Park for their own personal pleasure by issuing permits for trophy hunting. As you must be aware, the world was repulsed by the killing of the lion called Cecil in Africa last year. This incident created international negative response against trophy hunting and demonstrated that people who love wild populations of endangered animals will speak up and will not tolerate this kind of disrespect of endangered animals.	FWS-R6-ES-2016-0042-1467	

Their population is at risk as it isolated from other grizzly bear populations. There are no plans for connecting the two populations, which is key to long term survival of the species.			Post-delisting monitoring and management	I oppose the delisting of Greater Yellowstone Ecosystem grizzly bears. Their population is at risk as it isolated from other grizzly bear populations. There are no plans for connecting the two populations, which is key to long term survival of the species. Further, grizzly bears are one of the slowest reproducing mammals in North America. What would happen if a number of bears died due to unforeseen events in a single year? The population would be in jeopardy. Finally, state management of the bears is a risk in and of itself. We have seen what happened when these predator-unfriendly states "managed" the wolves. The populations were decimated. Wyoming's so much so that a federal judge had to re-list Wyoming wolves. There are no assurances that things would be any different with management of grizzlies. Indeed, the discussion between the states so far has indicated that they plan a trophy hunting season and that bears dispersing to connect with other populations would be among those first to be killed. As if that weren't enough, a majority of Americans oppose the delisting of Yellowstone area grizzly bears. These bears are icons of the American wilderness as well as a huge tourism draw to the region. They should be protected, not delisted.	FWS-R6-ES-2016-0042-1455	
HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. Montana, Wyoming and Idaho have shown themselves to be incredibly hostile toward predators. Bears trying to disperse have become victims of trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. Such is likely to be the norm after delisting. Any bear that has it's den outside the Grand Teton Park, Yellowstone Park, or on national forest lands, there is a good chance that these bears will be killed by hunters. This happened in November 2015 in Montana at the northern edge of the Yellowstone Ecosystem when a hunter, claiming self defense without proof of any aggression shown by the bear, shot and killed with one bullet, Grizzly #211, also known as Scarface, an aged grizzly (26 plus years) who happened to be in poor health. To add insult to the poaching of #211, the State of Montana withheld media release of this incident until after the comment period for the Delisting Grizzlies proposal was passed. This is exactly the kind of thing that removing Grizzlies from the Endangered List will become the norm for Montana, Wyoming and Idaho, under the guise of protecting the bears. The only protections these states want is to line their state coffers by the trophy hunters.			Post-delisting monitoring and management	My position on the proposed rule concerning the Removal of Grizzly Bears from the Greater Yellowstone Ecosystem from the Endangered and Threatened Wildlife list is as follows: - The proposed rule does nothing to address the lack of an adequate grizzly gene pool in the Yellowstone area. The existing grizzly population is to small and lacks access to other populations north of this ecosystem. There currently are no plans between Montana, Idaho or Wyoming to provide the means for grizzlies to reach other bear populations which would give them the opportunity to improve the biological diversity. - DECLINING FOOD SOURCES: It has been documented by Wildlife Management teams that grizzlies main food sources have been wiped out due to climate change (whitebark pine), invasive species (cutthroat trout) and use of pesticides in/and near the Yellowstone Ecosystem (moths). While some waterways are being restocked with cutthroat trout, this is only a part of the necessary diet for grizzly bears. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - HOSTILE STATE MANAGEMENT JEOPARDIZES SPECIES SURVIVAL. Montana, Wyoming and Idaho have shown themselves to be incredibly hostile toward predators. Bears trying to disperse have become victims of trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. Such is likely to be the norm after delisting. Any bear that has it's den outside the Grand Teton Park, Yellowstone Park, or on national forest lands, there is a good chance that these bears will be killed by hunters. This happened in November 2015 in Montana at the northern edge of the Yellowstone Ecosystem when a hunter, claiming self defense without proof of any aggression shown by the bear, shot and killed with one bullet, Grizzly #211, also known as Scarface, an aged grizzly (26 plus years) who happened to be in poor health. To add insult to the poaching of #211, the State of Montana withheld media release of this incident until after the comment period for the Delisting Grizzlies proposal was passed. This is exactly the kind of thing that removing Grizzlies from the Endangered List will become the norm for Montana, Wyoming and Idaho, under the guise of protecting the bears. The only protections these states want is to line their state coffers by the trophy hunters. - MOST AMERICANS OPPOSE DELISTING. Fifty-five percent of Americans are opposed to ending federal protections for the region's grizzly bears, and by a 3-to-1 margin people oppose grizzly hunting, a new poll conducted by Remington Research Group commissioned by the Humane Society of the United States and Wyoming Wildlife Advocates. - BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. A record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. As stated above, grizzlies are already being slaughtered by hunters. The claim of self-defense has yet to be verified, even after 5 months of investigation. If the Grizzly bear is delisted, further conflict with humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population.	FWS-R6-ES-2016-0042-1550	

FWS claims that the agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. But when David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods."			Post-delisting monitoring and management	FWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. But no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. But this is not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. But under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. FWS claims that the agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. But when David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS claims that Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. But this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS claims that the agency looks forward to hearing from the public about delisting.Yet a recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. FWS claims that the agency looks forward to consulting with Native American tribes about the delisting. But fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting.	FWS-R6-ES-2016-0042-1611	
FWS claims that Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. But this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management.			Post-delisting monitoring and management	FWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. But no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. But this is not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. But under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. FWS claims that the agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. But when David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS claims that Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. But this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native	FWS-R6-ES-2016-0042-1611	

				American tribes and the interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS claims that the agency looks forward to hearing from the public about delisting. Yet a recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. FWS claims that the agency looks forward to consulting with Native American tribes about the delisting. But fifty federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting.		
In my opinion, the most integral consideration in the decision to delist the GYE grizzly population is whether the decision is a reasonable interpretation of the congressional intent of the Endangered Species Act. The ESA states that conservation programs should be developed by States and other interested entities to "better safeguard, for the benefit of all citizens, the Nation's heritage in fish, wildlife, and plants." As the Service is well aware, U.S. History is full of a paucity of examples where state entities have allowed wildlife species within their jurisdiction to become extinct, or be threatened with extinction, before the federal government intervenes. The passenger pigeon, bison, California condor, and grizzlies are just a few of the more well known examples of this phenomena. The management framework that the GYE states must adopt if delisting occurs, will be critical in determining whether grizzly bears will continue to be able to thrive in the Yellowstone area. If the management framework is insufficient to keep the GYE grizzly population within management objectives, further intervention by the Service will be necessary, at increased social/economic/ecological costs.			Post-delisting monitoring and management	Attachments Proposed Rule Comment	FWS-R6-ES-2016-0042-1585	
I respectfully disagree that the factors that endanger the long term ability of grizzlies to thrive in the GYE have been sufficiently mitigated. Furthermore the history of endangered species in the United States shows that state entities are often negligent in the preservation of endangered species			Post-delisting monitoring and management	Attachments Proposed Rule Comment	FWS-R6-ES-2016-0042-1585	
Directly after removal from protections, in 2008, Grizzlies died in record numbers, there were virtually no penalties for killing them. Bear management had been turned over to fish and game agencies of Wyoming, Idaho and Montana who more than welcome the "opportunity to kill a Grizzly" a bear whose life was made less valuable by delisting. Some 54 grizzly bears "including 37 shot by humans" were known to have died that year, the highest mortality ever recorded% exceeding the extensive killings of 40 years ago when Yellowstone National Park closed down its garbage dumps leaving the bears to search for food sources in towns and campgrounds.			Post-delisting monitoring and management	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530	
"The first bears to be killed in a trophy sport hunt are likely to be celebrities such as Grizzly 399 that make their living along roadsides in Grand Teton and Yellowstone Parks, where they give thousands of visitors the thrill of a lifetime. These tolerant bears, which live partly on National Forest lands outside parks, would be especially vulnerable to hunting if federal protections are lifted later this year. These bears are comfortable with people and would be relatively easy to find. Moreover, certain local thugs have stated outright that they will be out to kill these much-beloved grizzlies" out of spite.			Post-delisting monitoring and management	See attached file(s) Attachments Delisting Greater Yellowstone Ecosystem Grizzlies	FWS-R6-ES-2016-0042-1530	

Without federal protection, management authority will be given to state and local governments who will almost certainly want to open hunting seasons on the bears. Such trophy hunting could significantly impact the genetic diversity of the population. This is because most hunters would target large, strong, healthy, and attractive bears, so they would be removing these favorable traits from the gene pool. Eventually, the population would grow weaker and would be more vulnerable to the effects of habitat loss, disease, climate change, etc. Aside from hunting, state governments would probably allow their residents more freedom to "remove" any bears that they feel would pose a threat to them.			Post-delisting monitoring and management	I oppose removing the GYE grizzly bear population from the List of Endangered and Threatened Wildlife. While the population has made a significant recovery since 1975 (from about 136 to about 700 today according to the National Park Service website), delisting the species now will only cause more harm than good. Removing protection from the bears will not only harm their own population, but may harm the entire ecosystem as well. It has been shown time and time again that most people are not comfortable with the idea of living next door to wild grizzly bears, or any predator for that matter. Without federal protection, management authority will be given to state and local governments who will almost certainly want to open hunting seasons on the bears. Such trophy hunting could significantly impact the genetic diversity of the population. This is because most hunters would target large, strong, healthy, and attractive bears, so they would be removing these favorable traits from the gene pool. Eventually, the population would grow weaker and would be more vulnerable to the effects of habitat loss, disease, climate change, etc. Aside from hunting, state governments would probably allow their residents more freedom to "remove" any bears that they feel would pose a threat to them. Of course, most people would unfortunately feel threatened by any bear within shooting distance. All these factors combined would certainly cause the GYE grizzly bear population to decline once again. It is important to understand that grizzly bears are an important umbrella species. By removing protection from the bears, you would be removing protection from their entire ecosystem. Because bears are predators, they help to manage the population sizes of many of the herbivores in the area. If the grizzly bear population significantly decreased, the herbivore populations would be allowed to increase. This could cause some overgrazing problems in the ecosystem, which would mean less food for all other species in the GYE, which would mean a decrease in multiple populations and communities, which would mean a decrease in overall biodiversity. This scenario may be a bit exaggerated, but it at least shows the important role the bears play in their ecosystem. In addition, bears, like humans, are omnivores, meaning they can eat almost anything. Berries and other plants make up a good portion of their diet, so every time they forage for food, they can pick up pollen on their fur and can carry countless seeds in their bellies. Because bears travel large distances, the undigested seeds in their droppings will have a whole new location to sprout and grow, away from their parent plants. This in turn, contributes to the overall health and genetic diversity of the vegetation. If the bears are no longer protected, then the vegetation will suffer as well. Thus, as previously stated, delisting the GYE grizzly bear population would only cause more harm than good. In fact, it is very hard to see or understand what good could come out of the situation at all. Many make the argument that they are proposing this new change, because the grizzly bear population has gotten too large to manage within the GYE boundaries. But perhaps the problem isn't the population size, but the boundaries themselves. Many people fail to understand or accept the fact that you can't contain nature. You just can't. Human made property boundaries mean absolutely nothing to wildlife. Energy, animals, nutrients, and resources are meant to flow throughout ecosystems and across landscapes, and will continue to for at least attempt to flow across our boundaries despite our best efforts to contain them. If connectivity is lost and	FWS-R6-ES-2016-0042-1664	
Many people may be against delisting grizzly bears in this area but they need to understand that the bears will not be forgotten. The idea of Idaho, Montana, and Wyoming having plans to manage the grizzlies after they are delisted is comforting. These plans must be well thought over because of the progress that has been made over the years. The idea of these states bringing plans to the table about what they will do with the grizzlies after they are delisted is comforting. We wouldn't want our tax dollars to be wasted and have the grizzly populations go down the drain. The idea of postponing the delisting until after the states have completed their plans has my support. These plans will allow the grizzlies to thrive in this ecosystem according to its carrying capacity as well as protect them from ever going back on the endangered and threatened species list.			Post-delisting monitoring and management	See attached file(s) Attachments Delist the Grizzly	FWS-R6-ES-2016-0042-1716	
GYE Grizzlies should be managed as an ecosystem population rather than separately by three different states, all of which have stated their desire to significantly reduce the population and limit their occupied habitat.			Post-delisting monitoring and management	I am apposed to delisting grizzly bears in the Greater Yellowstone Ecosystem (GYE) for the following reasons: 1. The fact is that one truly knows how many grizzlies there are in the GYE. Several prominent scientists and ecologists familiar with the GYE and grizzly bears doubt the U.S. Fish & Wildlife Services numbers. But what we do know is that at least 60 grizzlies died last year, mostly at the hand of man, and another 30 are unaccounted for and are likely also dead. Grizzlies have one of the lowest, if not the lowest reproductive rate of any mammal in the GYE. The continuation of such mortality rates will likely very soon result in a critically low GYE grizzly population. Much more work needs to be done in the GYE to prevent many of these grizzly deaths before this population can be safely delisted. Such actions as mandating that ranchers remove their garbage and carcass dumps to county facilities, the use of bear-proof garbage cans in communities, camping areas, etc. within the GYE, removal of domestic livestock from public lands important to grizzlies, mandating bear spray for hunters and other public land users in grizzly habitat need to be implemented within the GYE before grizzlies are delisted. 2. The GYE Grizzly population is an isolated island population. There are currently no connective corridors to other populations, endangering the continued survival of GYE bears. Mitochondrial DNA studies have shown that the grizzly population in Yellowstone National Park can trace their lineage back to only two female bears. There have been proposals to relocate bears from other populations into the GYE to improve genetic diversity but this has not occurred. Additionally, the state wildlife management agencies in the three states (Wyoming, Idaho, and Montana) within the GYE have publically stated in their pending management plans that they will "discourage" (i.e. kill) grizzlies in thousands of square miles of currently occupied habitat in the GYE and prevent them from colonizing other lands in which they were originally found. This will be done through "trophy hunting" at levels that will guarantee local extirpation. Much of this land is public land in which grizzlies should be allowed to survive and thrive. Grizzlies currently occupy only about 2% of their historic range. Grizzlies should absolutely not be "discouraged" from their currently occupied range, but instead should be "encouraged" to thrive in these areas while enabling colonization of other suitable habitats, most especially into areas that would extend potential key ecological corridors which may one day allow connection to other populations. 3. Historically important food sources for grizzlies such as whitebark pine nuts, cutthroat trout and possibly even army cutworm moths populations have recently been significantly reduced due to a variety of human caused issues. More research is needed to determine how the loss of these food sources will impact the future grizzly population in the GYE. 4. GYE Grizzlies should be managed as an ecosystem population rather than separately by three different states, all of which have stated their desire to significantly reduce the population and limit their occupied habitat. 5. Recent studies have shown that GYE Grizzly Bears are a currently important, and significantly rising economic resource to GYE communities. Yellowstone National Park visitors have listed grizzlies and wolves as the two most important species they want to be able to observe due to their scarcity. Many national park visitors come specifically to see these apex predators. Live bears are much more valuable to the GYE economy than dead bears. Live	FWS-R6-ES-2016-0042-1765	

Trophy hunting of the grizzly is not sound management of the speices. There should be a three to five year moratorium on even considering hunting as a management tool.			Post-delisting monitoring and management	I say NO to the delisting of Grizzly Bears.Trophy hunting of the grizzly is not sound management of the speices. There should be a three to five year moratorium on even considering hunting as a management tool. GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. The Yellowstone area population gene pool is too small and is disconnected from populations to the north. There are no plans to provide opportunities for the grizzlies to reach other bear populations to allow for biological diversity and dispersing individuals are subject to persecution, making connectivity all that much less likely. GRIZZLIES OCCUPY ONLY 1% OF THEIR HISTORIC RANGE. MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it	FWS-R6-ES-2016-0042-1783	
The funding of the extensive monitoring plan must be considered and guaranteed. This is a tough element to contend with at the outset of a program, but funding must be assured if this proposal is to ultimately be adopted. Perhaps			Post-delisting monitoring and management	See attached file(s) Attachments Grizzly Bear Delisting Proposal Attn	FWS-R6-ES-2016-0042-1757	
The states that you propose to hand over grizzly bear control and management to have a proven track record of supporting sport killing of other delisted species such as wolves. They had no regard for radio collared, research project or other animals. These states have crippled the pronghorn migratory routes, seen their ecosystem destroyed by cattle and feral horses. To trust the fate of the grizzly bears to these states is basically handing the bears a death certificate. I am a veterinarian as well as a sheep and cattle farmer in central KY.			Post-delisting monitoring and management	The states that you propose to hand over grizzly bear control and management to have a proven track record of supporting sport killing of other delisted species such as wolves. They had no regard for radio collared, research project or other animals. These states have crippled the pronghorn migratory routes, seen their ecosystem destroyed by cattle and feral horses. To trust the fate of the grizzly bears to these states is basically handing the bears a death certificate. I am a veterinarian as well as a sheep and cattle farmer in central KY. I do not get to graze my animals on land I do not own, there are no public lands or subsidies lent to me to help me feed my herds. Free roaming dogs have killed more than a dozen of my calves and 20 of my ewes in the last 10 years, there is no federal money for that and dogs are not crazily shot upon sight... The same is NOT true of incidents involving mountain lions, wolves, coyotes or bears. When the ranchers out there decide that a bear they have only SEEN in passing or merely seen evidence of its presence, even if it hasn't inflicted ANY damage upon them, but they see it as a threat, they will happily shoot it to remove the risk or fear of risk. The national averages for that area are that 24-40% of calves/cattle are lost to respiratory disease, less than 0.03% are lost to predation - ranchers can report ANY carcass feeding from these predators that are often scavengers as predation, they are likely to get federal monies to reimburse the value of that animal. There is NOT a rational nature to fear. I have NO belief that these states will handle grizzly bears in a responsible manner. Shoot first and don't ask any questions IS NOT the way to deal with bears. I urge you do NOT delist bears. It will be a tragedy for the remaining bears.	FWS-R6-ES-2016-0042-1796	
After a killing period of a few years, then you will have no option but to readmit what will then be a fragile population, followed by the very slow growth that a small population with a slow breeding rate will need to recover. With this in mind, then the trophy hunters will go all out to get their kill in the short period that the Grizzlies are off the list, which will further increase the problem, not helped by the likely long period of time, it will take to readmit them to the endangered list.			Post-delisting monitoring and management	sir/madam, I am writing to ask you to not delist the Yellowstone population of Grizzly Bears from the Federal Endangered List. From what I understand, one of the leading ecologists, David Mattson, doubts your population estimates. Given his 20 years in the area, then that must be a significant reason not to change their status. With crashes in their preferred foods, then there is the risk more will venture outside of the protected areas & run the risk of quickly being killed by the trophy hunters. They have shown time & again that they have no respect for wildlife or the species status as long as they get their kill. After a killing period of a few years, then you will have no option but to readmit what will then be a fragile population, followed by the very slow growth that a small population with a slow breeding rate will need to recover. With this in mind, then the trophy hunters will go all out to get their kill in the short period that the Grizzlies are off the list, which will further increase the problem, not helped by the likely long period of time, it will take to readmit them to the endangered list. Therefore, there is only 1 solution, reject the hunters demands & keep the Yellowstone Grizzlies on the Federal Endangered List. thank you	FWS-R6-ES-2016-0042-1818	
In addition, record number of grizzly bears were killed in 2015 - including the famous patriarch of Yellowstone, Scarface. Most of these killings were due to conflict with hunters or livestock operations. Once delisted, the states will be able to remove even more bears from the ecosystem due to human conflicts. We need to see what that looks like before grizzly hunting is permitted. Therefore, if bears are delisted, USFWS should institute a minimum five year moratorium on hunting to enable the surrounding states to prove effective management of grizzly bears.			Post-delisting monitoring and management	Please keep Yellowstone ecosystem grizzly bears protected under the Endangered Species Act. If bears are delisted, hunting should not be allowed. A large majority of Americans (68%), including 50% of hunters, oppose sport hunting of grizzly bears. These animals are icons of the West and are revered as sacred beings by the native tribes, 50 of which oppose delisting. In addition, record number of grizzly bears were killed in 2015 - including the famous patriarch of Yellowstone, Scarface. Most of these killings were due to conflict with hunters or livestock operations. Once delisted, the states will be able to remove even more bears from the ecosystem due to human conflicts. We need to see what that looks like before grizzly hunting is permitted. Therefore, if bears are delisted, USFWS should institute a minimum five year moratorium on hunting to enable the surrounding states to prove effective management of grizzly bears. Finally, if hunting is allowed, there must be no-hunt zones around the national parks and connecting Yellowstone and Grand Teton national parks. Hunting of roadside bears and popular park bears that wander out of the park endangers not only the bear population but the economy of the region. Yellowstone's nature-based economy is worth one billion dollars a year. People who work at the park can tell you what visitors are coming to see. It is not the mud pots or Old Faithful that are the big draw. Tourists flock to Yellowstone and the Grand Tetons for the wildlife - with grizzly bears topping the list. For these reasons, I ask USFWS to withdraw its plan to delist grizzly bears in the Yellowstone ecosystem or, at a minimum, dramatically strengthen the plan to protect a population that took 40 years to grow.	FWS-R6-ES-2016-0042-1822	
Until a comprehensive bear management plan is put in place and agreed to by Wyoming, Montana, and Idaho, it would be irresponsible to delist the grizzlies. Taking the bears off the list means that they'll once again be hunted, something we are firmly against.			Post-delisting monitoring and management	Our family frequently visits Wyoming and Yellowstone National Park. We care about all the animals in the state and we were happy to learn the grizzly bear population is thriving thanks to the Endangered Species Act. However, we were unhappy to learn that the Fish and Wildlife Service is considering taking grizzlies off the Endangered Species List. Until a comprehensive bear management plan is put in place and agreed to by Wyoming, Montana, and Idaho, it would be irresponsible to delist the grizzlies. Taking the bears off the list means that they'll once again be hunted, something we are firmly against. Please show us that the safeguards are in place for these magnificent bears to continue thriving before removing them from the list.	FWS-R6-ES-2016-0042-1831	

The increasingly far-right legislatures of Idaho, Montana, and Wyoming are thirsty for the bear management control that would come to their fish and game departments with delisting the Yellowstone grizzly. The bears would be hunted. Their numbers and the extent of their range would inevitably be reduced.		Post-delisting monitoring and management	I am the author of THE GRIZZLY BEAR, first published by Alfred A. Knopf in 1984 and republished several times, most recently in 1997 by Lyons and Burford. It was called "a classic" by the New York Times and is still considered the definitive book on the Yellowstone grizzly bear population. I am also a former chairman of the Greater Yellowstone Coalition as well as a former partner in a cattle ranch within the Greater Yellowstone Ecosystem which is seasonally occupied grizzly bear habitat. The proposed end of federal protection of the Yellowstone grizzly bear is trumpeted in some quarters as one of the great triumphs of the Endangered Species Act. In fact it would be a spurious victory. The most salient argument against delisting is the collapse of the grizzlies' food system. By far the most important source of nutrition for the bears has been the seeds of the whitebark pine tree, but the whitebark is under a double attack. The native mountain pine beetle has historically been kept in check by periodic deep freezes, but there haven't been any of those for years now. The other attacker is the deadly, non-native white pine blister rust. More than 95 percent of the whitebarks are now dead. Until recent years, early each summer there were vast runs of spawning cutthroat trout up the tributaries of Yellowstone Lake a high-fat feast for grizzlies. Since the illegal introduction of non-native lake trout, however, which feed on juvenile cutthroats, the spawning runs are down by 90 percent. A less well understood but equally grave danger is that Yellowstone grizzlies live on what is effectively an island. Island populations are subject to inbreeding and hence lowered reproduction rates and grizzlies are already among the least fecund mammals, rarely producing young until the age of five, with litters of two cubs most common, typically three years apart. When island populations dip, they cannot be resupplied by adjacent populations, because there aren't any. The study of island biogeography has found that islands always have higher rates of extinction. Grizzlies are notoriously hard to count, and some independent scientists have challenged the studies on which the government has based its population assessments not only of present numbers but of projected ones. Their analyses indicate that the population is already declining. The increasingly far-right legislatures of Idaho, Montana, and Wyoming are thirsty for the bear management control that would come to their fish and game departments with delisting the Yellowstone grizzly. The bears would be hunted. Their numbers and the extent of their range would inevitably be reduced. Opponents of delisting cite what happened when Yellowstone's gray wolves came under state management. Montana has been pretty good, but conservationists claim that Idaho's approach, at least in some parts of the wolves' range, has been not far short of outright slaughter, and Wyoming decreed that outside a zone encircling Yellowstone and its adjacent protected lands, the rest of the state would be a year-round free-fire zone. Grizzly bear management by these three states, based on their previous behavior, seems likely to reduce an already declining population with a declining food base. The only way Yellowstone's grizzly bears can be expected to thrive in the long run is for their ecosystem to be connected by a habitat corridor to other grizzly population the one centered on Glacier National Park and others up the Rocky Mountain chain to Alaska. That is still possible, if the connecting lands are protected, which they are not today. To take away the bears' federal protection now with their food sources plunging, their ecosystem isolated,	FWS-R6-ES-2016-0042-1832	
Opponents of delisting cite what happened when Yellowstone's gray wolves came under state management. Montana has been pretty good, but conservationists claim that Idaho's approach, at least in some parts of the wolves' range, has been not far short of outright slaughter, and Wyoming decreed that outside a zone encircling Yellowstone and its adjacent protected lands, the rest of the state would be a year-round free-fire zone. Grizzly bear management by these three states, based on their previous behavior, seems likely to reduce an already declining population with a declining food base.		Post-delisting monitoring and management	I am the author of THE GRIZZLY BEAR, first published by Alfred A. Knopf in 1984 and republished several times, most recently in 1997 by Lyons and Burford. It was called "a classic" by the New York Times and is still considered the definitive book on the Yellowstone grizzly bear population. I am also a former chairman of the Greater Yellowstone Coalition as well as a former partner in a cattle ranch within the Greater Yellowstone Ecosystem which is seasonally occupied grizzly bear habitat. The proposed end of federal protection of the Yellowstone grizzly bear is trumpeted in some quarters as one of the great triumphs of the Endangered Species Act. In fact it would be a spurious victory. The most salient argument against delisting is the collapse of the grizzlies' food system. By far the most important source of nutrition for the bears has been the seeds of the whitebark pine tree, but the whitebark is under a double attack. The native mountain pine beetle has historically been kept in check by periodic deep freezes, but there haven't been any of those for years now. The other attacker is the deadly, non-native white pine blister rust. More than 95 percent of the whitebarks are now dead. Until recent years, early each summer there were vast runs of spawning cutthroat trout up the tributaries of Yellowstone Lake a high-fat feast for grizzlies. Since the illegal introduction of non-native lake trout, however, which feed on juvenile cutthroats, the spawning runs are down by 90 percent. A less well understood but equally grave danger is that Yellowstone grizzlies live on what is effectively an island. Island populations are subject to inbreeding and hence lowered reproduction rates and grizzlies are already among the least fecund mammals, rarely producing young until the age of five, with litters of two cubs most common, typically three years apart. When island populations dip, they cannot be resupplied by adjacent populations, because there aren't any. The study of island biogeography has found that islands always have higher rates of extinction. Grizzlies are notoriously hard to count, and some independent scientists have challenged the studies on which the government has based its population assessments not only of present numbers but of projected ones. Their analyses indicate that the population is already declining. The increasingly far-right legislatures of Idaho, Montana, and Wyoming are thirsty for the bear management control that would come to their fish and game departments with delisting the Yellowstone grizzly. The bears would be hunted. Their numbers and the extent of their range would inevitably be reduced. Opponents of delisting cite what happened when Yellowstone's gray wolves came under state management. Montana has been pretty good, but conservationists claim that Idaho's approach, at least in some parts of the wolves' range, has been not far short of outright slaughter, and Wyoming decreed that outside a zone encircling Yellowstone and its adjacent protected lands, the rest of the state would be a year-round free-fire zone. Grizzly bear management by these three states, based on their previous behavior, seems likely to reduce an already declining population with a declining food base. The only way Yellowstone's grizzly bears can be expected to thrive in the long run is for their ecosystem to be connected by a habitat corridor to other grizzly population the one centered on Glacier National Park and others up the Rocky Mountain chain to Alaska. That is still possible, if the connecting lands are protected, which they are not today. To take away the bears' federal protection now with their food sources plunging, their ecosystem isolated,	FWS-R6-ES-2016-0042-1832	

The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. The population will decline after delisting, and cannot be sustained without life-support measures.	1100		Post-delisting monitoring and management	The proposal to delist Yellowstone Grizzly Bears is irresponsible and will result in the decimation of our Country's iconic symbol of the West. For the following reasons below the proposal to delist must be abandoned: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. 2. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout. 3. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. The population will decline after delisting, and cannot be sustained without life-support measures. 4. The delisting plan fails to address issues associated with high, ongoing human caused grizzly bear mortality. Most of the grizzly bears that die in the Greater Yellowstone Ecosystem die of human causes, and most are avoidable. While Yellowstone Park and some communities outside the park have gone to enormous measures to remove grizzly bear attractants, others have not. The problem of mortality of food-habituated bears will only get worse after delisting, when allowable mortality levels are raised, and resources for conflict resolution are reduced. Because problem grizzly bears are a human safety problem, it only makes sense to resolve the ongoing sanitation issues in the ecosystem before delisting. 5. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public. 6. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources. Please keep the Yellowstone Grizzlies protected! Do not delist them!	FWS-R6-ES-2016-0042-1912	
The turning over of Grizzly Bear management to the states surrounding is a gross mistake. Look how they managed Grey Wolves it is nothing but an attack to eliminate them. I think it is important to keep them listed up until we have had a chance to reform state wildlife management, because state management is such a poor alternative. It's a really poor alternative at a time when the population is becoming increasingly vulnerable.	1100		Post-delisting monitoring and management	Delisting of the Greater Yellowstone Grizzly Bear is just a political ploy to appease the state governments of Wyoming, Montana, and the "Trophy Hunting" community. A live Grizzly Bear is worth far economically to these states and communities adjacent to Yellowstone Park than the revenue from a hunting license and a Grizzly Bear rug hanging on some hunters wall. There is absolutely no consensus on the size of the grizzly bear population in Yellowstone. There are some estimates, and all of those estimates are beset by bias of one sort or another. On the one hand you'll hear them claiming there's a thousand bears, based on use of one method. On the other hand they'll say there's 700 bears, based on the use of a different estimator altogether. The carrying capacity is not static, it's not a constant. It varies hugely, and I would argue that because we've lost whitebark pine, we've lost cutthroat trout, we've lost most of the elk in the ecosystem, we've experienced a millennial drought which is promising more of the same to come, that we've seen a decline in carrying capacity. And so it's probably no surprise that the bear population is bumping its head up against carrying capacity. In fact, what we've had is a decline in carrying capacity, which has forced the same number of bears to redistribute themselves in search of foods making them look outside of Yellowstone. The turning over of Grizzly Bear management to the states surrounding is a gross mistake. Look how they managed Grey Wolves it is nothing but an attack to eliminate them. I think it is important to keep them listed up until we have had a chance to reform state wildlife management, because state management is such a poor alternative. It's a really poor alternative at a time when the population is becoming increasingly vulnerable. I am would be willing to predict is that if you wait two years out into the future using the exact same methods you're using now, the population estimate will be down to 600, at which point, even by your reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using your methods. Under a scenario like that, with the drivers afoot leading to elevated grizzly bear mortality as-is, I don't think we can afford to have any increase in mortality for any reason at all. There is another key reason that is being completely overlooked. None of your documents even acknowledge the spiritual importance to the Native American the significance of the Grizzly Bear to their culture. Doing so continues to keep Native Americans second class citizens in this country where all men are created equal	FWS-R6-ES-2016-0042-2000	
Funding to address these increasing risks are not available to either the three states nor to the federal land management agencies where these bears reside. Nor is it likely that funding will be made available to the states or federal land management agencies in the future to address these increasing risks.	1102		Post-delisting monitoring and management	While I was the BLM Dillon Field Manager, I served as the Montana BLM representative to the IGBC Yellowstone Ecosystem Subcommittee for ten years (2002-2012). Great strides have been made in increasing the Yellowstone sub population of Grizzly Bears, however more work in needed to reduce threats to this population of Grizzly Bears. Reduced high value food supplies due to the loss of Yellowstone Cutthroat Trout, Whitebark Pine Nuts, and the significant reduction in the Yellowstone Northern Elk Herd have decreased the upward trajectory of this population of Grizzly Bears. In fact the population increase has been static for the last ten years while human caused threats identified have not been addressed. This has resulted in increased mortality that cannot sustain the population long term. Increased human population, especially to the north and east of Yellowstone National Park has resulted in increased hunting pressure on Elk resulting in Grizzly Bear deaths due to conflicts with Grizzly Bears during hunting season. Continued domestic sheep grazing on USDA public lands in the Centennial and Gravelly Mountains of Southwest Montana have resulted in Grizzly Bear deaths and are prohibiting the genetic connection between the Northern Continental Divide and Yellowstone Ecosystems. Sport hunting of the Yellowstone Grizzly Bear cannot be justified due to increase risks that are not addressed and increasing mortality of these bears. Funding to address these increasing risks are not available to either the three states nor to the federal land management agencies where these bears reside. Nor is it likely that funding will be made available to the states or federal land management agencies in the future to address these increasing risks. States dont even require hunters to carry bear spray while hunting big game in hunting units occupied by grizzly bears. Until there is a substantial increase in the efforts to reduce risks to the Yellowstone Grizzly Bear I dont believe the Yellowstone Grizzly should be delisted.	FWS-R6-ES-2016-0042-1958	

I strongly feel that once a population (of any specie) has reached and exceeded pre-determined objectives for recovery, the management of the recovered population should be turned over to the state. Historically, states' management of species through licensed hunting seasons has proven effective at protecting and bolstering populations. Revenue via licensing goes to protect these populations via habitat protection and law enforcement.	1100		Post-delisting monitoring and management	As a hunter, living in Massachusetts and quite removed from the GYE, I am writing in support of the de-listing of the Grizzly bear from the Endangered and Threatened Wildlife list. I strongly feel that once a population (of any specie) has reached and exceeded pre-determined objectives for recovery, the management of the recovered population should be turned over to the state. Historically, states' management of species through licensed hunting seasons has proven effective at protecting and bolstering populations. Revenue via licensing goes to protect these populations via habitat protection and law enforcement. By continually moving the goal posts for what "recovery" is for a population and allowing anti-hunting interests to litigate away the biologists recommendations, we loose the power of the North American Model for Wildlife Conservation to protect population for future generations to experience. Please stay true to the ESA and the North American Model and move to de-list the grizzly bear in the GYE.	FWS-R6-ES-2016-0042-2109	
I read the proposed rule change and understand that hunting would be contingent upon what the states of Idaho, Montana and Wyoming do for management. Plus hunting would be away from areas of the park containing large numbers of visitors. But let's not be naive. Two things that will happen if the grizzly bears lose Federal protection. First, this population of bears has not been hunted in years. That means they do not have the learned survival and cautionary skills of other hunted animals. Grizzly bears are accustomed to being the top predator once they reach adulthood, which will make the Yellowstone bears 'sitting ducks'. Hunters *will* sit at the hunting boundaries waiting for bears to cross the line. A naive group of grizzlies is a trophy hunter's dream. What will stop hunting guides, who work for people like Walter Palmer, from luring trophy bears out of protected areas? Park Rangers won't be able to watch every hunting group. Without Endangered Species protection, a US version of Cecil the Lion *will* happen.			Post-delisting monitoring and management	Please do not remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. Yellowstone grizzlies are a special population in a special place. Only there, with all of the protections, can novice wildlife enthusiasts glimpse a view of a grizzly bear in its natural habitat behaving as it might in real life, without fear of humans. I am from Michigan and camp every year in the Upper Peninsula near Seney. According to our State DNR, 15000 - 19000 black bears live in the U.P., or ~1 bear/square mile. That is 5 times more higher the number of grizzlies in Yellowstone (~700 bears/ 3468 sq.miles). Yet, we haven't seen a live bear in 20 years. We see plenty of bear hunters and bear hounds, but, ever since bear hunting became so popular, the only bears we see are dead ones strapped across the hoods of trucks. I know black bears are shy, but the high hunting pressure makes them flee all humans. It would be a crime for all future generations of Americans to allow the same thing to happen in Yellowstone. My only visit to Yellowstone was in 2002 when my family camped there for 10 days. In addition to bison and thermal features, we hoped to see a grizzly bear. And we did! We were fortunate enough to have 3 separate sightings of grizzlies high on a hill and ambling across a meadow. When the bear appeared, everyone and every vehicle stopped. We stood with total strangers, watching for over an hour until the bear moved on and out of sight. That was pure magic which all Americans should be allowed to experience. I read the proposed rule change and understand that hunting would be contingent upon what the states of Idaho, Montana and Wyoming do for management. Plus hunting would be away from areas of the park containing large numbers of visitors. But let's not be naive. Two things that will happen if the grizzly bears lose Federal protection. First, this population of bears has not been hunted in years. That means they do not have the learned survival and cautionary skills of other hunted animals. Grizzly bears are accustomed to being the top predator once they reach adulthood, which will make the Yellowstone bears 'sitting ducks'. Hunters *will* sit at the hunting boundaries waiting for bears to cross the line. A naive group of grizzlies is a trophy hunter's dream. What will stop hunting guides, who work for people like Walter Palmer, from luring trophy bears out of protected areas? Park Rangers won't be able to watch every hunting group. Without Endangered Species protection, a US version of Cecil the Lion *will* happen. Second, after the bears have been hunted for a season or two, they will learn. And they will avoid all humans as best as they can. Those magical sightings that my family was privileged to have will be lost to all future Americans. That would be a terrible crime violating the whole purpose the National Park of Yellowstone. Next, Yellowstone grizzly bears do not represent a threat to humans, so no change in management is needed. Let's compare Yellowstone human-bear conflicts with murder in the United States: A Yellowstone webpage states "Eight total human conflicts with grizzly bears occurred inside the park in 2013, compared to an average of 6 a year during 1990-2012. Six of the conflicts involved property damage, 1 resulted in a food reward, and 1 human injury occurred." Another Yellowstone webpage states Yellowstone has around 4 million visitors each year. That means the odds of having a bear conflict in 2013 with this population of bears was $\frac{8}{4,000,000} = 8 \times 10^{-7}$ or 1 in 500,000, and the odds of an injury from a conflict were $\frac{1}{4,000,000} = 8 \times 10^{-8}$ or 1 in 1,000,000. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS. HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. In my opinion, HSUS is again correct. Look at the brutal treatment and killing contests involving wolves in these same three states. It is ugly and awful to be a Montanan who treasures wildlife and yet state governments want to use them for "sport" and as a profit center. FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management.	FWS-R6-ES-2016-0042-2659	
FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management.			Post-delisting monitoring and management	The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS. HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. In my opinion, HSUS is again correct. Look at the brutal treatment and killing contests involving wolves in these same three states. It is ugly and awful to be a Montanan who treasures wildlife and yet state governments want to use them for "sport" and as a profit center. FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS says, the agency says it looks forward to hearing from the public about delisting. The truth is, the public has already made it's views known: A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight-page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and fish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations." I like so many groups and interested members of the	FWS-R6-ES-2016-0042-2695	
They are still going to be hunted to extinction, no matter what the number is when they are considered 'too many'. What happens when we end up killing almost all of them again? Will there still be an 'endangered species protection' available? If they are going to allow the authorized killing of protected species then there needs to be more regulation: size, age, mating pairs, etc.	1103	1100	Post-delisting monitoring and management	As with many other protected species, they get to a point in population growth that people don't believe they are still endangered. This is wrong. These species are in danger! They are still going to be hunted to extinction, no matter what the number is when they are considered 'too many'. What happens when we end up killing almost all of them again? Will there still be an 'endangered species protection' available? If they are going to allow the authorized killing of protected species then there needs to be more regulation: size, age, mating pairs, etc. Save our animal and avian neighbors. Everything has a place in this world.	FWS-R6-ES-2016-0042-2796	

he Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered..			Post-delisting monitoring and management	According to Yellowstone National Park, over the last 40 years the grizzly population there has grown from 136 to a stable population of somewhere between 674 and 839 The recovery population goal was 500 and was actually met in 1999. However, the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered.. Yes, please do remove the grizzly bears from The List. Please let the States do the management. Thank you very much!!	FWS-R6-ES-2016-0042-2800	
Due to the difficulty in guaranteeing the states will not over hunt grizzly bears and the bears slow reproductive rate which could contribute to a severe reduction in numbers. I respectfully request that the grizzly bears status not be changed but rather culling be managed by the federal government if the numbers are determined to be too high. Relisting of animals such as the grizzly and wolves will be next to impossible in the current political climate.			Post-delisting monitoring and management	Due to the difficulty in guaranteeing the states will not over hunt grizzly bears and the bears slow reproductive rate which could contribute to a severe reduction in numbers. I respectfully request that the grizzly bears status not be changed but rather culling be managed by the federal government if the numbers are determined to be too high. Relisting of animals such as the grizzly and wolves will be next to impossible in the current political climate. Wolves which were delisted already show signs of overhunting. The recent kill of bear 211 is evidence that even with protection, bears are being killed illegally with little state action.	FWS-R6-ES-2016-0042-2802	
Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures.			Post-delisting monitoring and management	quoting Larry Fahn, " . . . there are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival. end quote I look forward to your response,	FWS-R6-ES-2016-0042-2750	
It was the lack of care from Wyoming's Game & Fish, that led to the listing in the first place, since they couldn't manage to stop the hunting even when the population was crashing. Why would we expect them to do any different now? We have seen how they have been unable to develop a viable Wolf Management plan, which recently led to the return of the ESA status in the state, but only after a lawsuit was initiated by conservationists had been filed and heard in the courts.			Post-delisting monitoring and management	Since Grizzly Bears took years of Endangered Species protections to come back from the brink of extinction in the lower 48 states, to where we might be able to see one once again in Yellowstone, it seems far too soon to delist at this time. There are more issues than a population count can address, such as the ever changing environmental factors, coupled with bears very slow reproductive rate(2nd slowest breeding animal in the continent) and fragility of health contributing to reproduction uncertainties. Occupation of less than 2% of historic habitat, with pockets of protections from trapping and hunting, will lead to isolated populations. It's well known that, one can only continue to breed relatives, of any species, for so long before genetic problems begin to arise and threaten any sustainable population. Currently we have a prime example of this problem displayed in the Isle Royale Wolves of Michigan. Isolated on an island and without any genetic biodiversity, they display genetic mutations and are dying out, at last report, there were two left. To not allow safe travel from one preserve to another, will effectively reduce the Greater Yellowstone Ecosystem population of Grizzly Bears to such a perilous position. It's already public knowledge that Wyoming, Montana and Idaho planed all along to sell hunting tags to the less than 4% of the population that trophy hunts, as soon as delisting occurs. It was the lack of care from Wyoming's Game & Fish, that led to the listing in the first place, since they couldn't manage to stop the hunting even when the population was crashing. Why would we expect them to do any different now? We have seen how they have been unable to develop a viable Wolf Management plan, which recently led to the return of the ESA status in the state, but only after a lawsuit was initiated by conservationists had been filed and heard in the courts. Both Grand Teton and Yellowstone National Park Superintendents have publicly stated they oppose the delisting of the Grizzly Bear and they based their position upon the best available science from the experts in the field of Grizzly Bear knowledge and physical area in question, the biologists of the Parks, the best bear experts in the world. We are certain that climate changes are occurring and that science is evolving daily. We know that currently we live in what is called, The 6th Major Extinction on Earth, loosing more species in the last few years, than any there space in time since the dinosaurs died. We have also seen the Public Outrage over the trophy hunting of lions in Africa. The Yellowstone/Teton Grizzlies are just as famous, if not more so than Cecil the Lion. Ethically and morally it is wrong to kill any animal for a trophy. A 3 year study by USFWS, led by Chris Servheen, a known trophy hunter, affiliated with Safari Club International, is a biased and non-scientifically validated opinion, motivated by desire to hunt the bears. Never seen by the public, nor PEER reviewed by a panel of independent experts in the field, it is outrageously arrogant and shortsighted to accept any non-validated and transparent study. Amounting to nothing less that the Fox guarding the Hen House, this supposed study, would never make it to any Scientifically Valid Journals and probably the reason it's been hidden from anybody's view and evaluation. To think it's appropriate to take away the bear viewing opportunity of millions of people, coming from all over the world, to visit Yellowstone and Grand Teton National Parks, only to cater to the fractional less than 4% of wealthy trophy hunters, is to ignore the fact that there's a renewable, multi-million dollar tourism industry, pumping in millions upon millions of dollars into the	FWS-R6-ES-2016-0042-2819	

Ten years ago the George W. Bush administration attempted to delist the grizzly bear in the Greater Yellowstone Ecosystem, removing all protections provided by the Endangered Species Act. Now the FWS is trying to do this all over again. Why? Leave the healthy grizzly population alone. Let it continue to flourish and dial down the human activity -- that's where closer regulation needs to occur. For once, take a proactive approach to protecting this species, rather than waiting until it is threatened again. One day, you will act too late, and the grizzly will be gone forever. One other thing -- I, and many others, suspect the this proposed FWS action is motivated by special economic interests. We citizens are weary of having our national parks and the wildlife population controlled by those who are motivated by profit and by those who cater to those outside interests. Just stop.			Post-delisting monitoring and management	I urge the U.S. Fish and Wildlife Service to abandon the Grizzly delisting plan. We should be giving added effort to protecting this American icon rather than exposing the grizzly population to the ravages of climate change, food scarcity, genetic isolation, huge threats of deranged trophy hunters, and loss of habitat due to continuing development and other human activities. Ten years ago the George W. Bush administration attempted to delist the grizzly bear in the Greater Yellowstone Ecosystem, removing all protections provided by the Endangered Species Act. Now the FWS is trying to do this all over again. Why? Leave the healthy grizzly population alone. Let it continue to flourish and dial down the human activity -- that's where closer regulation needs to occur. For once, take a proactive approach to protecting this species, rather than waiting until it is threatened again. One day, you will act too late, and the grizzly will be gone forever. One other thing -- I, and many others, suspect the this proposed FWS action is motivated by special economic interests. We citizens are weary of having our national parks and the wildlife population controlled by those who are motivated by profit and by those who cater to those outside interests. Just stop.	FWS-R6-ES-2016-0042-2897	
STATE CONFLICTS OF INTEREST. The states have not shown that they can work together to manage their apex predator populations, and several officials of the surrounding states have indicated that they wish to eradicate apex predators from their areas. These creatures don't know where state lines begin and end, and some of the most natural habitats for grizzlies are in decidedly unfriendly states.			Post-delisting monitoring and management	I object to delisting the grizzly bear from the Endangered Species Act. Barring that, the delisting does not need to be accompanied by the legalization of trophy hunting for the following reasons: AS WE SAW WITH SCARFACE, BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. In 2015, record number of Yellowstone area grizzly bears were killed despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population. Additionally, there are ranchers right outside of Yellowstone (in MT) who are practicing wildlife sustainable ranching. Rather than give ranchers a license to kill, can't we first ask that they try these methods? The economic impact of grizzlies being road friendly in Yellowstone is huge. Once they start being hunted, they will become less road friendly and there will be fewer visitors to Yellowstone. IF HUNTING IS ALLOWED, THERE MUST BE BUFFER ZONES around national parks and a no-hunt zone in between Yellowstone and Grand Teton National Park, minimally, and up through the Tom Miner Basin area in Montana. CLIMATE CHANGE NEEDS TO BE CONSIDERED. Climate change is causing unprecedented changes in the Yellowstone ecosystem. Temperatures in Yellowstone are already 1.4F higher than last century average. These changes have decimated at least one food source. USFWS needs to consider how climate change will impact bears' food sources and behavior. USFWS failed to do this with wolverines and had to have a court order USFWS to consider climate change in wolverine listing. Additionally, we can't say that we are being environmentally responsible and kill off apex predators. The environment does not stop with the flora but is equally impacted by the fauna, particularly apex predators. MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. The outcry over the killing of Cecil the Lion by many Americans will be repeated here. We cannot object to the killing of Cecil and then less than a year later sanctify the right of hunters to do the exact same thing in the U.S. STATE CONFLICTS OF INTEREST. The states have not shown that they can work together to manage their apex predator populations, and several officials of the surrounding states have indicated that they wish to eradicate apex predators from their areas. These creatures don't know where state lines begin and end, and some of the most natural habitats for grizzlies are in decidedly unfriendly states. I am disappointed that under a Democratic president that U.S. Fish & Wildlife would even consider delisting which is the equivalent of unprotected our wildlife. While I appreciate that delisting shows that there has been some success in restoring the grizzly population in the lower 48, the sad fact is that it comes with a license to trophy hunt which is unfair after years of protection, and to a barely sustainable population of animals. It is one thing to hunt elk or deer which thrive in abundance, and which are then consumed but trophy hunting is ultimately about the act of killing an apex predator for bragging rights that it can be done. The meat is not eaten, the body is dismembered or stuffed and becomes a living room ornament on the floor or wall. Of course it can be done with our high	FWS-R6-ES-2016-0042-2859	
The Grizzly Bears of Greater Yellowstone need continued protection of the Endangered List. If there was any doubt, just look & see what is happening to the wolves that were de-listed way before they should have been. They are being killed off for no good reason & should be put back on the Endangered list immediately. The very same thing would happen to the Grizzly Bears, God forbid, it they were removed. There are way too many people with no regard for living, breathing creatures that would just love to go after one. And it's not just bears & wolves, but every other of this country's wildlife that is facing such non-thinking or non-caring people with guns. Our wildlife have a law given right to their life. The Fish & Wildlife Service was established to protect our wildlife, not allow the wholesale killing that goes on today.			Post-delisting monitoring and management	The Grizzly Bears of Greater Yellowstone need continued protection of the Endangered List. If there was any doubt, just look & see what is happening to the wolves that were de-listed way before they should have been. They are being killed off for no good reason & should be put back on the Endangered list immediately. The very same thing would happen to the Grizzly Bears, God forbid, it they were removed. There are way too many people with no regard for living, breathing creatures that would just love to go after one. And it's not just bears & wolves, but every other of this country's wildlife that is facing such non-thinking or non-caring people with guns. Our wildlife have a law given right to their life. The Fish & Wildlife Service was established to protect our wildlife, not allow the wholesale killing that goes on today.	FWS-R6-ES-2016-0042-2983	
Firstly it notes that the population has grown between zero and 2.2% from 2002 to 2012. Meaning minimal growth. Your own scientists are telling you that the population is static at best. Secondly - Assuming there are 714 grizzlies in 2016, which IBSGT state is the number. 27% of these are females of 5 and over that can give birth to young. They give birth to an average of 2 cubs every 3 years. The survival rate of the cubs is 55%. So that gives a population increase of 59 bears per year. 714 @ 27% = 192 reproducing females, 192/3 = 64 bears giving birth in a year, Average 2 cubs per cycle = 108, Survival rate of 55% = 59 young bears born and survive each year.			Post-delisting monitoring and management	I oppose removing the GYE Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. With current birth rates and mortality rates, the grizzly bear population is in decline. More bears are being killed than are being born. The numbers I use below are taken from an IGBST study in September 2012 ("Updating and evaluating approaches to estimate population size and sustainable mortality limits for Grizzly bears in the Greater Yellowstone Ecosystem" - http://nrmssc.usgs.gov/files/norock/IGBST/GYGBMonMortWksRpt2012(2).pdf) Firstly it notes that the population has grown between zero and 2.2% from 2002 to 2012. Meaning minimal growth. Your own scientists are telling you that the population is static at best. Secondly - Assuming there are 714 grizzlies in 2016, which IBSGT state is the number. 27% of these are females of 5 and over that can give birth to young. They give birth to an average of 2 cubs every 3 years. The survival rate of the cubs is 55%. So that gives a population increase of 59 bears per year. 714 @ 27% = 192 reproducing females, 192/3 = 64 bears giving birth in a year, Average 2 cubs per cycle = 108, Survival rate of 55% = 59 young bears born and survive each year. Thirdly, the mortality rate of 61 in 2015 (https://www.usgs.gov/data-tools/2015-known-and-probable-grizzly-bear-mortalities-greater-yellowstone-ecosystem) does include some of these cubs (10 to be exact) so it would be double counting to say the birth rate minus the death rate is a true number. But the report also states that 1 bear dies for 2 that are documented, so 61 deaths could be something like 90 deaths. The mortality rate is likely to increase. The very high mortality rate of 2015 will become the rule, not the exception. And that's before delisting and before hunting is allowed. There are minimal investigations into bear killings, and minimal deterrents (fines, imprisonment). Hunters and ranchers are killing bears with impunity. For example the killer of "Scarface" is still not known. In addition there are increased killing of conflict bears by USFWS and the Game & Fish departments as bears look for food further afield. In summary 59 bears born and survive each year and a mortality rate of around 90 means the population is declining and will continue to decline. I oppose removing the GYE Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife	FWS-R6-ES-2016-0042-2989	

The IGBST has been less than transparent about making taxpayer funded data (which they have maintained an exclusive monopoly) available for scrutiny by the larger scientific community. All raw data on grizzly bears collected by government agencies should be made available to independent scientists. In view of the wide disagreement about delisting decisions, the USFWS should establish a review panel of independent, academically qualified scientists who are not involved in current grizzly bear research in the GYE.			Post-delisting monitoring and management	My comment is included in the uploaded file. Attachments 5-4-16GrizzCommentFinal	FWS-R6-ES-2016-0042-2973	
Yellowstone grizzly bears should not be delisted because if they are, they will be subject to trophy hunting by the states of Wyoming, Montana and Idaho, which have already divided up the percentages of bears that can be hunted.			Post-delisting monitoring and management	Grizzly bears are a slow-to-reproduce species one of the slowest in the animal kingdom. For instance, a mother grizzly bear spends up to four years raising and provisioning her young teaching them how to be bears. It's a huge investment of time, but if their mother gets killed by a trophy hunter, the her cubs will die from starvation or predation. Yellowstone grizzly bears should not be delisted because if they are, they will be subject to trophy hunting by the states of Wyoming, Montana and Idaho, which have already divided up the percentages of bears that can be hunted. Grizzly bear are a majestic species worth far more alive than dead. They bring tens of millions of dollars to the Northern Rockies states' economies each year. More than 4 million visitors went to Yellowstone and Grand Teton national parks in 2015 alone. Last year, Wyoming realized \$1.1 billion from national park-related revenues. This money helps a lot more people in these states. If someone shoots a grizzly bear, others cannot view or photograph it. Trophy hunters will stuff their dead bears, put their heads over their mantelpieces or turn them into bear skin rugs. That's just wrong. Wildlife belong to us all not just rich trophy hunters. Yellowstone grizzly bears need more protections not less right now, because their major staples, whitebark pine seeds and Yellowstone cutthroat trout, have declined precipitously. Please retain Yellowstone's grizzly bears on the Endangered Species List.	FWS-R6-ES-2016-0042-3002	
This inadequacy has not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review. A Scientific Accountability The IGBST has not been transparent about making taxpayer funded data (which they have maintained an exclusive monopoly) available for scrutiny by the larger scientific community. All raw data on grizzly bears collected by government agencies should be made available to independent scientists. In view of the wide disagreement about delisting decisions, the USFWS should establish a review panel of independent, academically qualified scientists who are not involved in current grizzly bear research in the GYE			Post-delisting monitoring and management	There is not enough evidence to support the delisting of Grizzlies in Yellowstone, please consider the following points. Declining food resources The Rule loosley dismisses the loss of critical foods, whitebark pine seeds, cutthroat trout, cutworm moths and meats from a varitey of sources, by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase numbers in the ecosystem (ref. Fig. 1 p 13180, of The Rule). An alternative that has not been considered in The Rule, is that carrying capacity itself has already been reduced, primarily as a result of declining food resources. The alternative of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population. This alternative hypothesis must be fully explored to satisfy the requirement for "best science" as required by law. Excessive, unsustainable mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population. Bears are one of the slowest reproducing mammals in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of recent years is not sustainable. Even with federal protection these levels of mortality have occurred. Removing T&E protection and placing it in the hands of the three states of Idaho, Montana, and Wyoming is not compatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and maintained before the population can be considered recovered. Genetic viability The Greater Yellowstone grizzly population is isolated from all other grizzly populations. This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Allowing hunting of this vulnerable population will only lead to rapid loss of genetic viability resulting in a less fit and viable breeding population resulting from inbreeding. Evidence supporting genetic viability of the Yellowstone Grizzly population is seriously flawed and violates the requisite principle of "Best Science." Climate Change Impacts The impact of climate change on Yellowstone's grizzlies is dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement un-referred publication by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence summarily dismissed with the	FWS-R6-ES-2016-0042-3076	

The state of Wyoming knows what is best since they are the ones living here. So let's give the management authority back to the state.			Post-delisting monitoring and management	I support delisting the grizzly bear. As a wildlife biology and management major, I understand the importance of carrying capacity in wildlife. It is important that we manage the bears rather than letting their numbers run loose so that the population doesn't increase too much. Therefore we should be able to determine a reasonable population of bears and hunt them to keep them there. The grizzlies are at the top of the food chain, besides humans, so they aren't going to be in danger from other animals. They are in danger from themselves because if there is too high of a population they will start depleting all of the resources. Hunting is not something that should be taken away from us, so we need to share the available prey with them. Having too many top predators would reduce our ability to hunt because there will be smaller populations of prey. To keep the prey, such as elk, at optimal population numbers you would reduce our right rather than reducing the amount of bears. I think this is wrong. Yes we should have predators, but we shouldn't allow them to over populate. Right now, my step father lives in Wapiti, Wyoming, which most people know is on the main route the the east entrance of Yellowstone. Wapiti is highly colonized by people, and grizzlies share that habitat too. In the past several years, grizzlies have become more and more of a problem with the people living here. There is numerous amounts of wilderness lands around Yellowstone that should allow the bears to live comfortably. When bears and humans start having conflicts in developed areas I think we have a problem. I'm not saying bears will never be around humans, but when they are causing problems and government agencies are constantly moving, trapping, or killing bears this should be a red flag. There is a grizzly bear recovery zone set aside just for them. The bears are now well past those boundaries and expanding quickly. There is no reason to say they have not recovered and no longer need protection especially when the population has exceeded the target 500 bear goal by almost double. I grew up hunting, fishing, and camping on horses in the wilderness of Shoshone National Forest, and I have been face to face with grizzly bears. Those who want to protect them should have to go into an elk camp in September in the Thorofare and stay there for the month. After that experience, then I will listen to what they have to say. Every outfitter knows the struggles of the grizzlies in their camps, around their horses, clients, and carcasses. Bear advocates want to group outfitters as bear haters, but if they lived in the outfitter's shoes for a year, they might think differently too. Not to say they are bear haters, it's just another problem to stack onto their extremely high daily load of duties. Simultaneously, every once in a while there is a habituated grizzly bear that causes a problem, charges, or endangers someone's life in the backcountry. These bears should not be given more than one chance, but with them protected it causes many problems with anyone who shoots one in self defense. When a person is in a life threatening situation, they shouldn't have to hope they will not get accused of shooting an endangered species purposefully and fear the consequences that come with it. If grizzlies were delisted, needing to shoot a bear would result in simpler actions. From the government side of the spectrum, my father is a law enforcement officer for the forest service where he spends most days riding a horse in the wilderness. He encounters bears just like the outfitters do and he sees first hand all of the problems. I also have worked for the forest service in backcountry trails for the past three summers.	FWS-R6-ES-2016-0042-3160	
STATE MANAGEMENT JEOPARDIZES THE GRIZZLIES SURVIVAL. Many states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains.			Post-delisting monitoring and management	I completely OPPOSE delisting Yellowstone Grizzlies. For lots of reasons but these are the main ones, - DECLINING FOOD SOURCES: Historically bears dependent on 4 food sources. In recent years, whitebark pine has been decimated due to climate change and cutthroat trout lost due to invasive species. The third of the 4 food sources - moths - are unreliable food source due to pesticides. - GRIZZLIES ARE ONE OF SLOWEST REPRODUCING MAMMALS IN NORTH AMERICA. As a result, loss of several females in a year could be devastating for the population. - STATE MANAGEMENT JEOPARDIZES THE GRIZZLIES SURVIVAL. Many states have shown themselves to be incredibly hostile toward predators. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the GYE population with the northern population of bears impossible. Further, these state management practices could quickly reverse any population gains. - MOST AMERICANS OPPOSE DELISTING. A recent poll by Wyoming Wildlife Advocates and Humane Society of the United States found that a majority of American voters do not support the proposed delisting. 55% of Americans oppose delisting, while just 26% support it. - GRIZZLY BEARS WILL BE KILLED EVEN IF THEY REMAIN PROTECTED. There is a poaching problem, a record number of Yellowstone area grizzly bears were killed in 2015 despite Endangered Species Act protections. Further conflict with livestock operations, in particular, and humans, in general, can be expected as grizzlies range farther looking for food sources to replace those lost in recent years. It is premature to delist now. We should wait and see how these removals impact the overall population of The Iconic Grizzly.	FWS-R6-ES-2016-0042-3243	
Delisting will almost certainly lead to the reopening of sports hunting on grizzlies and the loss of genetic viability. It will hand over management of grizzlies to Montana, Wyoming and Idaho, states with poor to abysmal track records when it comes to defending the welfare of large predators.			Post-delisting monitoring and management	See Attached Attachments Regele Susan	FWS-R6-ES-2016-0042-3272	
The rate of the bears grew at 13 bears over 41 years. Yet last year 61 bears were killed. 18 of those are still under investigation. In the three years before that there were 44, 50, and 31 dead bears respectively. These numbers do not add up. This is not about the Grizzlies. I do not trust the FWP to manage the bears based on their past history. Idaho puts radio colars on Wolves instead of elk and says it was confused. Do they think we lack a brain? Most species removed from the Endangered Species List are, in fact, NOT hunted. Consider the bald eagle? Delisting is not synonymous with sport hunting.			Post-delisting monitoring and management	I am against the delisting of Grizzlies. The rate of the bears grew at 13 bears over 41 years. Yet last year 61 bears were killed. 18 of those are still under investigation. In the three years before that there were 44, 50, and 31 dead bears respectively. These numbers do not add up. This is not about the Grizzlies. I do not trust the FWP to manage the bears based on their past history. Idaho puts radio colars on Wolves instead of elk and says it was confused. Do they think we lack a brain? Most species removed from the Endangered Species List are, in fact, NOT hunted. Consider the bald eagle? Delisting is not synonymous with sport hunting.	FWS-R6-ES-2016-0042-3288	

Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures.			Post-delisting monitoring and management	The grizzly bear, perhaps more than any other wildlife species, represents the wilderness that shaped us as an American people, and it sustains our spirit and culture. Although the bears have been removed from 99 percent of their historic range by the tide of human development, we are in some ways comforted knowing they still live in our midst -- playing with and nurturing their young, digging for grubs and hunting prey. Seeing a grizzly bear in the wild is usually an experience that remains with you for life. The Endangered Species Act has helped bring the grizzly bear back from the brink of extinction. The bears in the greater Yellowstone ecosystem need its help, and yours, to continue on their road to recovery. There are many compelling reasons why removing ESA protections is premature at best and potentially devastating to the grizzly's recovery. The still relatively small population remains subject to genetic difficulty. It is as if a family of siblings and second and third cousins were left to populate a desert island. Inbreeding is a serious threat to the genetic diversity of these animals. While bears in Yellowstone feed on elk, bison and fish, it is important to understand that their most essential food source is seeds and nuts from the whitebark pine. These trees, which grow at high elevations, are themselves under increased threat from blister rust, an accidentally imported fungus, and from mountain pine beetles, which bore into the tree's bark to breed and rear young, killing the tree in the process. Both of these threats will increase as global-warming trends continue. Historically, the bitter cold winters of Yellowstone would wipe out the fungus and beetle infestations. No longer. Studies by the Natural Resources Ecology Lab at Colorado State University and by scientists at the U.S. Forest Service clearly document warming trends over recent decades in the mountainous regions of the western United States, with strong correlations to increased insect and fungi infestation to native pine tree populations. Finally, delisting will re-open surrounding areas within the greater Yellowstone ecosystem to new development -- golf courses, mini-mansions, malls, ranches, roads, pipelines, oil and gas drilling and logging. Human/bear interactions will increase, and bears will die. Four Wyoming counties have already passed laws prohibiting bears within their borders. Local authorities are itching to start killing bears that might wander into their jurisdictions. Without maintaining federal ESA protections, it will be open season on these remarkable creatures. Rather than delisting the grizzly bears, federal, state and local governments should be looking for ways to connect their habitats to those other regions to the north, most of which are in Canada, where small populations of the bears remain. Protecting forests with large roadless tracts, and developing biological corridors between grizzly populations can help ensure genetic diversity and the grizzly's long-term survival.	FWS-R6-ES-2016-0042-3349	
Please do not delist the Grizzly Bears and hand over their lives to states which management which manages by hunting. The population has grown less than 19 bears a year: Do the math. A population of 150 bears were put under the ESA 41 years ago and we only have 750 bears which are already subject to being put down for cattle deaths and humans interactions. That is less than 20 bears a year. So many more will be killed if they are delisted.			Post-delisting monitoring and management	Please do not delist the Grizzly Bears and hand over their lives to states which management which manages by hunting. The population has grown less than 19 bears a year: Do the math. A population of 150 bears were put under the ESA 41 years ago and we only have 750 bears which are already subject to being put down for cattle deaths and humans interactions. That is less than 20 bears a year. So many more will be killed if they are delisted. I say again: Do the math, apply the science. Keep Grizzly Bears listed.	FWS-R6-ES-2016-0042-3415	
After all I have read I wonderf if the delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that I sternly oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. Â			Post-delisting monitoring and management	We must immediately stop the U.S. Fish and Wildlife Service (USFWS) from removing the grizzly bear in the Greater Yellowstone Ecosystem Montana, Idaho and Wyoming from the Federal Lists of Endangered and Threatened Wildlife. They must not delist the Yellowstone grizzly bear.. Critics of the USFWS proposal say that lifting protections for the bear could endanger a growing population, and a lot of the US Public believe that also. The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to an estimated 700 or more today. But grizzly bears have all but disappeared from almost all of the continental United States, except for Yellowstone and Glacier National Park and a few other slivers of habitat, the New York Times reported May 3. After all I have read I wonderf if the delisting is being done for political, not scientific reasons of course ranchers want to obliterate all wildlife, and hunters are eager for a grizzly bear trophy. The sickening fact is delisting would turn over management of the species to the states and allow for a hunting season, a controversial aspect that I sternly oppose. Hundreds of wolves in Montana and Idaho have already been hunted and killed each year since they were delisted in those states in 2009. We cannot let humans jeopardize grizzlies again. Humans and their inability to secure their garbage is what led to the decline of the Yellowstone grizzly in the first place. Bears who raided dumpsters left unsecured or food left behind at campsites were shot for being scary nuisances. Grizzly bears have the lowest reproductive rate of any mammal in North America besides humans. And climate change is negatively impacting their food sources. With development increasing in the Northern Rockies region, instead of proposing a plan to delist grizzly bears, USFWS should be working with the National Park Service to expand Yellowstone National Park and Glacier National Park so the grizzly bears, and other wildlife, can continue to thrive. I also read that the author of the report that led to the delisting proposal, Dr. Christopher Servheen, grizzly bear recovery coordinator, U.S. Fish and Wildlife Service, admits private land development is the greatest threat to the nation's grizzlies, as further development could cut off connectivity among populations and disrupt vital habitat. Please do what is right and scientifically backed and don't delist the grizzly bear because it would be the beginning of the end for them. Thank you for your time and consideration on this very important issue.	FWS-R6-ES-2016-0042-3441	
I believe it is high time that the management of the Grizzly Bears belongs in the hands of the people who have the most at stake. They are the most intimately familiar with said animals because they interact with these magnificent animals sometimes on a daily basis. They are certainly the most familiar with their habitat requirements and what they need to thrive. They also recognize that they must be able to be controlled if necessary to protect the public interest. They know how to educate the public on how to live in harmony with this wild creature. I say it's time to let the individual states take over management of the Grizzly Bears like they have been doing with the Gray Wolves. There are already many safeguards in this program to guarantee its success. Let's let the individual state agencies involved have their chance.			Post-delisting monitoring and management	After living in Wyoming for over 20 years, Montana for over 5 years, I believe it is high time that the management of the Grizzly Bears belongs in the hands of the people who have the most at stake. They are the most intimately familiar with said animals because they interact with these magnificent animals sometimes on a daily basis. They are certainly the most familiar with their habitat requirements and what they need to thrive. They also recognize that they must be able to be controlled if necessary to protect the public interest. They know how to educate the public on how to live in harmony with this wild creature. I say it's time to let the individual states take over management of the Grizzly Bears like they have been doing with the Gray Wolves. There are already many safeguards in this program to guarantee its success. Let's let the individual state agencies involved have their chance. I for one think that even the most vehemently opposed will be impressed!	FWS-R6-ES-2016-0042-3468	

Endangered species status seemed to result in a dramatic recovery of the population over the past three decades. (until 2015)There will be inconsistent management of the Grizzly as a nuisance or as a potential trophy by Idaho, Montana and Wyoming. This will put the population at great risk. Hunters will claim that they had to shoot a bear in self-defense. Bears habituated to large metal objects (cameras) in Yellowstone NP will be treated very differently when confronted by large metal objects (rifles) outside of Yellowstone.			Post-delisting monitoring and management	Delisting the Grizzly bear from Endangered species status is a bad idea. My understanding is that there has been a 6-10% multi-causal mortality of the Yellowstone population of Grizzly Bears during 2015. This level of mortality is not sustainable and hardly indicates a recovered population. Common sense would dictate that this trend needs to followed for several years before management is turned over to three states that are hostile to co-existence with large carnivores. A Reliable source, (Mattson, 2016) states that "dramatic increases in grizzly bear activity on moth sites have also contributed to inflated estimates of growth for the Yellowstone grizzly bear population. Bears on moth sites are almost certain to be seen by airborne researchers and managers out looking for females with cubs-of-the-year. " Endangered species status seemed to result in a dramatic recovery of the population over the past three decades. (until 2015)There will be inconsistent management of the Grizzly as a nuisance or as a potential trophy by Idaho, Montana and Wyoming. This will put the population at great risk. Hunters will claim that they had to shoot a bear in self-defense. Bears habituated to large metal objects (cameras) in Yellowstone NP will be treated very differently when confronted by large metal objects (rifles) outside of Yellowstone. How did the USFWS account for climate change in making this decision? Three of the Grizzly Bear's main food sources (pine nuts, elk, and cutthroat trout) are in decline. As someone who has spent much time observing and photographing bears in the wild, the magnificent Grizzly is a symbol of the wildness that remains in the American West. The Grizzly is a source of inspiration and is worshipped by many Americans. Those interested in sport hunting can travel to Alaska where the Alaskan Grizzly and Brown Bear are not endangered and have a stable food source. Would the USFWS please disclose the special interests that have been involved in their recommended delisting decision. I urge the USFWS to make a decision regarding the Grizzly Bear that is science based and not driven by political interests. Please expand the Primary Conservation Area for the Yellowstone Grizzly to include all of the known moth sites, and then protect these sites and a substantial surrounding area from any sport hunting. Better yet, please continue ESA for the Yellowstone Grizzly Howie Garber MD	FWS-R6-ES-2016-0042-3453	
I oppose delisting because I believe state wildlife agencies will manage the population primarily for the benefit of hunters and to generate additional revenue for the agencies, rather than for the benefit of the ecosystem as a whole. The unofficial, but obvious, primary mission of state agencies has always been to maintain unnaturally high ungulate populations in order to satisfy their hunting constituency. There is no reason to believe that their management of grizzlies towards that end will be any different. It's better to not manage them at all by keeping the listing in place so that nature may take its course to reach an equilibrium.			Post-delisting monitoring and management	I oppose delisting because I believe state wildlife agencies will manage the population primarily for the benefit of hunters and to generate additional revenue for the agencies, rather than for the benefit of the ecosystem as a whole. The unofficial, but obvious, primary mission of state agencies has always been to maintain unnaturally high ungulate populations in order to satisfy their hunting constituency. There is no reason to believe that their management of grizzlies towards that end will be any different. It's better to not manage them at all by keeping the listing in place so that nature may take its course to reach an equilibrium.	FWS-R6-ES-2016-0042-3587	
I believe any change to the grizzly bear status is premature. Currently their habitat is changing, apparently from the direct and indirect impacts of a changing climate. No matter the other influences on making a decision, prudence dictates awaiting more information on the emerging bear-ecosystem relationship. One not-very-unlikely risk is that the combination of delisting and ecosystem changes will lead to a crisis that is recognized only after-the-fact. If that crisis is followed by a delayed response, the likely result would be a grave decrease in population diversity.			Post-delisting monitoring and management	I believe any change to the grizzly bear status is premature. Currently their habitat is changing, apparently from the direct and indirect impacts of a changing climate. No matter the other influences on making a decision, prudence dictates awaiting more information on the emerging bear-ecosystem relationship. One not-very-unlikely risk is that the combination of delisting and ecosystem changes will lead to a crisis that is recognized only after-the-fact. If that crisis is followed by a delayed response, the likely result would be a grave decrease in population diversity.	FWS-R6-ES-2016-0042-3590	
The fate of these animals should not be turned over to individual states who appear to be more concerned with opening the areas to trophy hunting rather than to maintaining a stable bear population. I support the statement of the Greater Yellowstone Coalition that the Yellowstone grizzly population should be managed as an ecosystem population, not as separate Wyoming, Idaho and Montana populations. Grizzly management needs to continue through cooperation and coordination between the U.S. Forest Service, National Park Service, Native American tribes, the Interagency Grizzly Bear Study Team and the states involved, with public input.			Post-delisting monitoring and management	I oppose delisting of Greater Yellowstone Ecosystem grizzlies. It has taken 40 years for the grizzly population to recover to where it is today. Grizzlies are one of the slowest reproducing mammals in North America, under optimal conditions giving birth only every three years. If delisted the efforts of FWS for the last 40 years to rebuild the grizzly population would be very quickly wiped out by sport hunting. The fate of these animals should not be turned over to individual states who appear to be more concerned with opening the areas to trophy hunting rather than to maintaining a stable bear population. I support the statement of the Greater Yellowstone Coalition that the Yellowstone grizzly population should be managed as an ecosystem population, not as separate Wyoming, Idaho and Montana populations. Grizzly management needs to continue through cooperation and coordination between the U.S. Forest Service, National Park Service, Native American tribes, the Interagency Grizzly Bear Study Team and the states involved, with public input.	FWS-R6-ES-2016-0042-3850	

4. Population Estimates A remote and rugged area such as the Greater Yellowstone ecosystem posed problems for accurate measurement. Accuracy- real accuracy- is necessary for making such a huge decision about delisting. The current methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by any subsequent IGBST rebuttal and so I would think it fair and in the interests of rigorous science for all data regarding grizzly numbers to be made available for truly independent scientific analysis and review.		Post-delisting monitoring and management	I wish to comment on the proposed removal of the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. I wish to strongly oppose such a removal for the following reasons: 1. Climate Change Impacts Climate change is a real, scientific and provable issue and the park and its inhabitants have already been affected. To be dismissed in The Rule by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." with no proper scientific evidence is laughable. The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule, which is highly questionable. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population. This leads into my second point. 2. Declining food resources There is no evidence in The Rule for true accounting on this point. Historically, there have been four critical foods for grizzlies in Yellowstone: whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high-elevation talus slopes from lower elevation agricultural fields where they are a pest. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are "generalists with a broad range in diet", but what really is important for maintaining the population is availability of high quality food at the right time of the year within an INTACT ECOSYSTEM. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. These four points have not been taken into consideration. This is unscientific. 3. Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase numbers in the ecosystem (ref. Fig. 1 p 13180, of The Rule). Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. Do the math: mortality levels of recent years is not sustainable. 4. Population Estimates A remote and rugged area such as the Greater Yellowstone ecosystem posed problems for accurate measurement. Accuracy- real accuracy- is necessary for making such a huge decision about delisting. The current methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by any subsequent IGBST rebuttal and so I would think it fair and in the interests of rigorous science for all data regarding grizzly numbers to be made available for truly independent scientific analysis and review.	FWS-R6-ES-2016-0042-3805	
The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for delisting.		Post-delisting monitoring and management	No one really knows how many grizzlies are in the GYE. The shortage of cutthroat trout and whitebark pine nuts two of the grizzly's primary foods, are a threat to the grizzly's long term survival. The bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine which is a critically important food source." Climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yaak region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states	FWS-R6-ES-2016-0042-4226	

The approach of letting states manage the bears is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations.			Post-delisting monitoring and management	No one really knows how many grizzlies are in the GYE. The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foods, are a threat to the grizzly's long term survival. The bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine which is a critically important food source." Climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "...the grizzly population will be down to 600, at which point, even by [FWS] reckoning there will be no prospect of any sport hunting at all, and that not too long after that we will be below 600, headed to 500, using their methods." Climbing back up from this decline will be difficult. Grizzlies are one of the slowest-reproducing mammals in North America, says Roger Hayden, managing director of Wyoming Wildlife Advocates. If conditions are right, a female gives birth only every three years. FWS will have spent more than 40 years recovering the grizzly population, only to see it squandered in a couple of years of sport hunting. The Greater Yellowstone Coalition (GYC) opposes sport hunting of grizzly bears and believe sport hunting is unnecessary for managing a stable bear population. At minimum, says GYC, a delay in the onset of hunting until the states	FWS-R6-ES-2016-0042-4226	
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Even if protections are restored after a population collapse, the bottleneck effect will result in an irreversible loss of genetic diversity that will affect the long-term security of the population. Any action that makes it legal to sell hunting permits for the grizzly bear should be rejected without consideration unless surveillance technology is mandated to eliminate the threat of poaching, and the number of licenses to be issued is determined by an independent panel of ecological researchers.			Post-delisting monitoring and management	700 individuals may be enough to sustain a safe population, but that number will rapidly collapse due to over-hunting if the animals are removed from the endangered species list. Poaching will be masked by legitimate hunting activity, and there is a significant risk that too many licenses will be issued. Even if protections are restored after a population collapse, the bottleneck effect will result in an irreversible loss of genetic diversity that will affect the long-term security of the population. Any action that makes it legal to sell hunting permits for the grizzly bear should be rejected without consideration unless surveillance technology is mandated to eliminate the threat of poaching, and the number of licenses to be issued is determined by an independent panel of ecological researchers.	FWS-R6-ES-2016-0042-4265	

USFWS claims that Montana, Idaho, and Wyoming will successfully use hunting to manage the recovered grizzly bear population. If GYE grizzly bears are delisted, the three states have already signaled that they will open up trophy hunting seasons for the bears. Wyoming holds the vast majority of grizzlies. I do not believe that Wyoming can be considered capable of maintaining populations of any large carnivore in a scientific manner, considering its dismal record of "managing" wolf populations. Its wolf management is so bad that it has had to be struck down in federal court twice. Only now that the wolf has been relisted in Wyoming are we finally seeing wolves again in Grand Teton National Park, which will prove to increase visitation to that park and consequently tourist revenue.			Post-delisting monitoring and management	I am asking you to NOT delist grizzly bears in the Greater Yellowstone Ecosystem. The USFWS claims that there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. However, David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. In reality, no one really knows how many grizzlies are in the GYE. Furthermore, population growth has stagnated since the early 2000's, and the Yellowstone grizzly population declined by 59 bears in 2015 alone. The USFWS also claims that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. Groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide. Therefore, the grizzly bear cannot be delisted in just the GYE. By USFWS own estimates, around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Grizzlies now survive in only 4% of their historic range in the Lower 48. The species is far from recovered nationally. Furthermore, Yellowstone's Grizzly population has no connectivity with outside populations, and has not for the last 100 years. This means that today's population came from a gene pool of only 136 animals (the population low point in 1975. This lack of genetic diversity threatens the Yellowstone grizzly's survival in the long term. USFWS claims that the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foods is not a threat to the grizzly's long term survival. Whitebark pine nuts have long been considered to be the single most important food source for grizzlies. In the last 20 years, whitebark pines have been decimated by both blister rust and pine beetles. The pine beetle epidemic has been linked to climate change. According to Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council, "Yellowstone grizzly bears are likely declining in the wake of the loss of whitebark pine, a critically important food source." USFWS claims that Montana, Idaho, and Wyoming will successfully use hunting to manage the recovered grizzly bear population. If GYE grizzly bears are delisted, the three states have already signaled that they will open up trophy hunting seasons for the bears. Wyoming holds the vast majority of grizzlies. I do not believe that Wyoming can be considered capable of maintaining populations of any large carnivore in a scientific manner, considering its dismal record of "managing" wolf populations. Its wolf management is so bad that it has had to be struck down in federal court twice. Only now that the wolf has been relisted in Wyoming are we finally seeing wolves again in Grand Teton National Park, which will prove to increase visitation to that park and consequently tourist revenue. Montana has released its management plan and is proposing a spring hunting season to run between March 15 and April 20. Yet we have already seen grizzly sows with cubs in Yellowstone National Park as early as April 16th. With warming temperatures in the future, emergence could occur even earlier than that. This means grizzly sows with new cubs could be killed and these tiny helpless bears left motherless. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. The IUSEMS	FWS-R6-ES-2016-0042-4260	
1. The proposed delisting rule is premature. Grizzly bears currently occupy less than 1% of their former range and represent only 1% of the pre-European population. The ESA requires that adequate regulatory mechanisms be in place before removing a protected species from the list of endangered and threatened wildlife. 15 U.S.C. 1533 (c); 50 C.F.R. 424.11. These measures ensure continued recovery for the species after federal ESA protections are removed. The proposed rule depends on a conservation strategy and state management plans that do not exist in final form yet. 81 Fed. Reg. at 13,189.			Post-delisting monitoring and management	Thank you for the opportunity to comment on the U.S. Fish and Wildlife Service's (USFWS) proposed rule to remove the Greater Yellowstone Ecosystem (GYE) population of grizzly bears from the federal list of endangered and threatened wildlife (81 Fed. Reg. 13,174 (Mar. 11, 2016)). 1. The proposed delisting rule is premature. Grizzly bears currently occupy less than 1% of their former range and represent only 1% of the pre-European population. The ESA requires that adequate regulatory mechanisms be in place before removing a protected species from the list of endangered and threatened wildlife. 15 U.S.C. 1533 (c); 50 C.F.R. 424.11. These measures ensure continued recovery for the species after federal ESA protections are removed. The proposed rule depends on a conservation strategy and state management plans that do not exist in final form yet. 81 Fed. Reg. at 13,189. 2. USFWS cannot proceed in simultaneously designating the GYE population of grizzly bears as a "distinct population segment" (DPS) under the ESA while also delisting the newly created entity. See 81 Fed. Reg. 13,190; and Humane Soc'y of the United States v. Jewell, 76 F. Supp. 3d 69 (D.D.C. 2014). USFWS may "respectfully disagree[s]" with the court's analysis and interpretation of the agency's DPS policy in Humane Society, 81 Fed. Reg. 13,190, but it cannot ignore the law as it currently stands. 3. The impacts of climate change, loss of vital food sources and the lack of connectivity to other grizzly bear populations in the lower 48 states seriously jeopardize the recovery of grizzly bears in the GYE. USFWS will undermine the recovery of the species as a whole by prematurely removing the federal protections that allowed the GYE population to make a comeback in the first place. 4. USFWS notes repeatedly throughout the proposed rule that the primary threat facing grizzly bears since their listing (and before) is human-caused mortality. See e.g., 81 Fed. Reg. 13,178; 13,187; 13,200. Yet, the proposed rule provides provisions for state-regulated trophy hunts to occur as soon as the rule is finalized. This makes no sense. Hostile state management focused on trophy hunting and removal of bears that attempt to disperse out of the GYE could quickly reverse population gains and eliminate any possibility of connectivity between bear populations. Last year, the GYE population experienced record-high mortality levels with 59 deaths, 54 of which were likely human-caused. IGBST Mortality Database (2015). Allowing the dramatic increase in mortality that hunting will most likely bring to this population will directly reverse recovery efforts from nearing success to beginning recovery efforts all over again. 5. Before delisting, conflicts with domestic livestock must be addressed by requiring non-lethal deterrent techniques, followed by the removal of livestock rather than the removal and/or killing of bears. Any future conservation strategy should include the voluntary retirement of livestock grazing permits and a commitment to reduce grazing in grizzly bear habitat. I urge you to reconsider your proposal to remove federal ESA protections from GYE grizzly bears. Such a proposal is premature and does not comport with your responsibility and duty under the law to recover this species to the American West.	FWS-R6-ES-2016-0042-4336	
Hostile state management jeopardizes species survival. Bears trying to disperse would be subject to trophy hunting and removal, making connecting the populations impossible. Further, these state management practices could quickly reverse any population gains. Å			Post-delisting monitoring and management	#NAME?	FWS-R6-ES-2016-0042-4274	
TAXPAYERS HAVE FUNDED RECOVERY FOR 40 YEARS. Now USFWS is planning to turn grizzly management over to states known for their hatred and hunting of predators. This is a poor return on investment. The taxpayers have an interest in the continued health of the grizzly population and most Americans (55%) oppose delisting. Even more Americans (68%) oppose hunting of grizzly bears if delisted. Å			Post-delisting monitoring and management	#NAME?	FWS-R6-ES-2016-0042-4274	

OUR CLAIM IS THAT your agency will stay involved with protecting the grizzly population after delisting. Å YET THE REALITY IS: x The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. Å HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. Å YOUR CLAIM IS THAT: Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. Å YET THE REALITY IS THAT: This approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations.			Post-delisting monitoring and management	I would like to enter the following comments about the proposed delisting of the Yellowstone Grizzly: YOUR CLAIM IS THAT there are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. YET IN REALITY: no one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." YOUR CLAIM IS THAT the shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foodsis not a threat to the grizzly's long term survival. YET THE REALITY IS: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. YOUR CLAIM IS THAT your agency will stay involved with protecting the grizzly population after delisting. YET THE REALITY IS: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. YOUR CLAIM IS THAT: Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees fit. YET THE REALITY IS THAT: This approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. ===== SPECIAL OBJECTIONS!!! ===== YOUR CLAIM IS THAT: your agency looks forward to hearing from the public about delisting. YET THE REALITY IS: A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following: 55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. YOU CLAIM THAT your agency claims to look forward to consultation with Native American tribes about the delisting - AND YET IN REALITY: Fifty federally	FWS-R6-ES-2016-0042-4382	
I am concerned that delisting would give full management authority to the states of Idaho, Wyoming and Montana, which are notoriously hostile to large carnivores. State management guarantees a grizzly bear sport hunt, which is not justified in light of current excessive mortality rates. Further, if grizzly bears are delisted, the states plan to eliminate them in habitat that is critical to their long-term recovery.			Post-delisting monitoring and management	I write to express my opposition to delisting of Yellowstone grizzly bears, and support of the efforts of Tribes to preserve the iconic and sacred Great Bear. State and federal agencies have not addressed the mounting threats of human development, climate change, invasive species, and the subsequent loss or diminishment of key foods, including whitebark pine seeds, cutthroat trout, and elk. As bears seek out yet more meat to compensate for the collapse of these foods, they are being killed at unsustainably high rates that threaten their survival. I am concerned that delisting would give full management authority to the states of Idaho, Wyoming and Montana, which are notoriously hostile to large carnivores. State management guarantees a grizzly bear sport hunt, which is not justified in light of current excessive mortality rates. Further, if grizzly bears are delisted, the states plan to eliminate them in habitat that is critical to their long-term recovery. Despite significant reductions in the availability of human foods and attractants to grizzly bears, humans are still the number one cause of bear mortality. Instead of delisting, a move that would dry up funds and lower agency commitment to coexistence programs, the Department of Interior should redouble efforts to reduce human-bear conflicts. Delisting is also premature due to the long-term isolation of Yellowstone's grizzly bears. Relying on trucking in bears to deal with the problem of genetic isolation is risky and unwise, especially when it is still possible to naturally reconnect Yellowstone and Northern Continental Divide grizzly bear populations. Restoration of grizzly bears in the vast Selway Bitterroot recovery area would also boost connectivity between Northern Rockies ecosystems. Delisting and sport hunting would undermine prospects for connectivity and permanently isolate Yellowstone's grizzly bears. I support the efforts of a growing coalition of Tribes that is dedicated to protecting Yellowstone's bears and preventing delisting. I ask that you initiate formal consultation with all involved tribes, and promptly correct the disrespectful and dismissive behavior of your staff towards Indian people involved with the grizzly bear issue. The sovereignty of Tribes must be recognized and respected Recovery of the Yellowstone grizzly bear population is achievable, but not if the hard-fought gains of the last 40 years are reversed by delisting. Please do not risk the future of Yellowstone's iconic grizzly bears. Thank you for your consideration	FWS-R6-ES-2016-0042-4399	
Grizzly bear mortality by all causes (human and natural) is precarious at best. Sport(Trophy) hunting can easily push bearmortality past the brink of recovery. The Grizzly bear reproductive rate is extremely low making any recovery very slow,(Kindof like the white bark pine). Once Grizzly deaths exceed births you are headed towards extinction. De-listing would acceleratethis and the proposed controls are to slow reacting to properly ward this off. The Grizzly bear population has leveled out in recent years and the cause of this leveling off should be identified by furtherresearch.			Post-delisting monitoring and management	I am writing you to request that you not de-list the Grizzly Bear from the ESA, Climate change's effect on the food sources of the Yellowstone ecosystem are profound. They alone are reason enough never to de-list the Yellowstone Grizzly. The white bark pine nuts are a major Grizzly food source, and have all but disappeared from Yellowstone due to higher winter temperatures. The white bark pine is also found in high remote unoccupied areas where the female Grizzly can feed undisturbed. Army cutworm moths, another Grizzly food source found in high talus fields are being pushed north out of Yellowstone by rising temperatures, and pesticide spraying in the plains states. As the weather gets hotter and dryer it stresses the vegetation and grasses the base animals depend on, causing a decline in the food quality for Elk, Bison and rodents, all bear food source. Cutthroat Trout are also disappearing, after the appearance of Lake Trout in Yellowstone lake. The efforts to eradicate the Lake trout have been expensive and un-successful. Grizzly bear mortality by all causes (human and natural) is precarious at best. Sport(Trophy) hunting can easily push bear mortality past the brink of recovery. The Grizzly bear reproductive rate is extremely low making any recovery very slow,(Kind of like the white bark pine). Once Grizzly deaths exceed births you are headed towards extinction. De-listing would accelerate this and the proposed controls are to slow reacting to properly ward this off. The Grizzly bear population has leveled out in recent years and the cause of this leveling off should be identified by further research. The power and push of the states to grant hunting rights to the wealth few to increase revenue is offset by the money spent by others to see wild Grizzlies. I live in a state that had, or may have them and I feel the sorrow of their absence. Thank you for the chance to present a few random thoughts.	FWS-R6-ES-2016-0042-4505	

We do not trust the states to do a good job. Wyoming has done so badly with wolves that a federal judge took management away from them. Idaho Fish and Game sneaked a hunter into the Frank Church-River of No Return Wilderness to kill wolves because they felt the wolves were taking too many elk in the Chambelain Basin. This was done without public knowledge or input. The state fish and game agencies are under constant pressure to kill predators from state politicians who oppose their protection and wish to see them eradicated. Grizzlies, and largest and most charismatic of western omnivores, would certainly be no exception.			Post-delisting monitoring and management	May 9, 2016 The Portneuf Valley Audubon Society is opposed to delisting the Yellowstone grizzly from the Federal List of Endangered and Threatened Wildlife for the following reasons: 1.) We do not trust the states to do a good job. Wyoming has done so badly with wolves that a federal judge took management away from them. Idaho Fish and Game sneaked a hunter into the Frank Church-River of No Return Wilderness to kill wolves because they felt the wolves were taking too many elk in the Chambelain Basin. This was done without public knowledge or input. The state fish and game agencies are under constant pressure to kill predators from state politicians who oppose their protection and wish to see them eradicated. Grizzlies, and largest and most charismatic of western omnivores, would certainly be no exception. 2.) There is not strong evidence that the Yellowstone grizzly has recovered. The U.S. Fish and Wildlife Service claims that the bears are recovered because they are dispersing out of Yellowstone National Park and the primary conversation area. However, they could well be moving out of the area because of lack of food. Their primary protein source, the cutthroat trout, is gone from Yellowstone Lake and related spawning streams because of the lake trout. Other food sources like the whitebark pine nut stands are also failing. Stand that are still viable are outside of the park and in areas where the grizzlies would be hunted and killed. Since 2003 there have been approximately 700 grizzlies reported in the Greater Yellowstone Ecosystem. Numbers for 2015 are 717. These numbers do not suggest recovery but simply the same number of bears over 12 years, give or take, and these bears are dispersing. If they were leaving because of increased population, not lack of food, we would expect to see an increase in the number of bears. This has not happened. 3.) Finally, we believe the wish on the part of U.S. Fish and Wildlife Services to delist the Yellowstone grizzly could well be due to politics, not science. It is well known that the current director, Dan Ashe, is no friend of endangered and threatened species. He has been hostile to wolf recovery, listing the obviously threatened sage grouse, and is willing to allow wind farms' collateral kill of bald eagles to increase from 1000 to 4000 annually. For these reasons we oppose delisting the Yellowstone grizzly. It is obvious the bears are a favorite with the public and we fear, with good reason, that the states of Wyoming and Idaho will do their best to kill them once federal protection is removed. Jackie Johnson Mauaghan, treasurer	FWS-R6-ES-2016-0042-4648	
There are significant and disturbing discrepancies in the language pertaining to mortality management in the Proposed Rule (PR) versus Chapter 2 (Population Standards and Monitoring) of the Conservation Strategy (CS). In particular, a significant discussion of mortality management in the PR (p. 13203-4) is simply non-existent in the CS. This discussion includes significant details that provide definitions of total, background, and discretionary mortalities, gives clarifying examples specifying exactly how these mortalities are to be calculated, and provides details regarding the process for determining how many bears would be available for hunting. Also, Appendix P which is the memorandum of agreement (MOA) between the states of Idaho, Montana, and Wyoming regarding the management and allocation of discretionary mortality is simply missing from the CS. The expectation that any substantive assessment can be provided when this important document is missing strains credulity and essentially eliminates the ability of informed citizens to examine and comment on the content of this MOA. The Conservation Strategy will be the salient go-to document for grizzly bear management well into the future. These important details are necessary to ensure that through time (as administrative personnel changes) the application of mortality thresholds is consistently adhered to. The language between the PR and the CS, especially as it pertains to mortality management, should match. These major discrepancies and the lack of State Plans defy the necessary regulatory mechanisms that must be in place for delisting to occur.			Post-delisting monitoring and management	See attached file(s) Attachments JSchmitt_Proposed Rule comments_2016	FWS-R6-ES-2016-0042-4727	
I encourage the USFWS to continue to work with the state grizzly bear management agencies, tribal agencies, and state and federal land management agencies that will be responsible for grizzly bears post delisting on: i, Ensuring that robust protections remain in place for the Yellowstone grizzly bear core population including strict limits on mortality and strong habitat protections within the Primary Conservation Area (PCA), the area identified to remain the most protective for grizzly bears after delisting; ii, Giving Yellowstone grizzly bears the opportunity to continue to expand their range and reconnect with other grizzly bear populations to the north as well as allow for Yellowstone grizzly bears to expand into the Bitterroot Recovery Zone, currently absent of a grizzly bear population; iii, Expanding and strengthening habitat protections currently only allocated to the PCA into the larger Demographic Monitoring Area and further into areas identified as important to linkage between grizzly bear populations; iv, Continuing and strengthening programs that proactively minimize conflicts between bears and people thereby improving social tolerance and public acceptance for the bears throughout their range; and v, Working together to broaden partnerships and secure long term adequate funding for grizzly bear conservation and recovery into the future.			Post-delisting monitoring and management	See attached file(s) Attachments 160509_fws-r6-es-2016-0042-0001_keep_esa_protections_for_yellowstone_grizzlies	FWS-R6-ES-2016-0042-4459	

Grizzlies reproduce slowly. Cubs are with their mothers for three years. Although the state plans will no doubt take this into account, there has not been any serious attempt at penalizing poor judgement or vision on the part of hunters. As we have seen with wolves we have a "Oh golly gee I thought it was a coyote" attitude and NO penalties. Grizzlies cannot withstand that kind of assault.			Post-delisting monitoring and management	If you're going to delist Grizzlies, it should be based on sound science. It is not. USFWS claims there are 700 bears in the Greater Yellowstone ecosystem, but that's a guess that is challenged by researchers that have worked with them for 20 years. There are several factors that are threatening the survival of grizzlies - among them the loss of the cutthroat trout and the whitebark pine beetle. If these critically important food sources collapse, the grizzlies will be in trouble. Grizzlies reproduce slowly. Cubs are with their mothers for three years. Although the state plans will no doubt take this into account, there has not been any serious attempt at penalizing poor judgement or vision on the part of hunters. As we have seen with wolves we have a "Oh golly gee I thought it was a coyote" attitude and NO penalties. Grizzlies cannot withstand that kind of assault.	FWS-R6-ES-2016-0042-4776	
The hunting of Grizzly bears will become rapidly popular and the population will not be able to keep up with demand from the hunting season. The number of deaths will be greater than births.2.2) As a result of a population not being able to keep up the bears will shortly be put back into a dangerous number			Post-delisting monitoring and management	It is not in the best interest of the grizzly bear to be taken off the endangered species list for many reasons. 1) The population is not spread out far enough to ensure a healthy gene pool for future generations 2) The population has grown but not to a substantial amount 2.1) The hunting of Grizzly bears will become rapidly popular and the population will not be able to keep up with demand from the hunting season. The number of deaths will be greater than births. 2.2) As a result of a population not being able to keep up the bears will shortly be put back into a dangerous number 3) Once you've opened the Grizzly Bear to hunting, eventually if the time comes to revoke that decision, the amount of poachers will be greater than it is today.	FWS-R6-ES-2016-0042-4865	
ast year in Florida's first black bear hunt, quotas were exceeded over the first weekend of the hunt. If quotas for a grizzly hunt were accidentally exceeded, the time to rebuild the population could be significant. And from my observation with the limited sport hunting allowed of wolves, both here in my home state of Minnesota, and out west, once sport hunting starts, the appetite for it increases- regardless of if animal population numbers "support" continued hunts or not.			Post-delisting monitoring and management	I am writing to respectfully share my opposition to the proposal to delist grizzlies in the Greater Yellowstone Ecosystem. I submit my comments as someone who takes an annual back country trip to another grizzly habitat, Glacier National Park in Montana, and who over the years has developed a deep appreciation for grizzlies. I also have a deep appreciation for the fact that, while generally calm, when feeling that they/their young may be threatened, they can pose a life threatening danger to hikers/backpackers or others. Given recent decreases in their food sources, and more bears wandering further in search of sustenance, I can anticipate that many of the bears in the Yellowstone system will wander at times outside of the park's boundaries. I have concern that any sport hunting which might be allowed by states after delisting (and which are already rumored to be in the works) would not only threaten the grizzly population, but could also increase the potential for conflict/threat between grizzlies and non-consumptive wildlife users, such as hikers/backpackers. If a bear were to survive or witness an encounter with a sport hunter, I worry that that bear would be more prone to perceive other humans as a threat, and therefore put people at greater risk as well. I am also concerned given how slowly grizzly bears reproduce, and the inexact science with regards to counting their population. Last year in Florida's first black bear hunt, quotas were exceeded over the first weekend of the hunt. If quotas for a grizzly hunt were accidentally exceeded, the time to rebuild the population could be significant. And from my observation with the limited sport hunting allowed of wolves, both here in my home state of Minnesota, and out west, once sport hunting starts, the appetite for it increases- regardless of if animal population numbers "support" continued hunts or not. If the FWS allows for the hunting of grizzlies, I think we need to be prepared for there to be more pressure for grizzlies to be hunted, whether or not the science would support that as a possible alternative at any given time. I also want to note the recent meta-analysis of the impact of hunting keystone predators upon their ability to best perform their vital ecological functioning, and that the environmental detriment is not simply a function of the number of animals left on the landscape, but also of the ways their behaviors are influenced by being subject to hunts (Ripple, et.al., Bioscience, 2009). In closing, I would like to add one additional matter. The USFWS says that it wants to work with Native American groups on this proposal. Over fifty native american groups have already shared that they are opposed to this delisting. Please listen to the voices of Native Americans, myriad scientists, and many many other Americans, and do not move forward with the delisting of grizzlies at this time. Thank you for your time and attention.	FWS-R6-ES-2016-0042-4930	
The Service is rushing to delist the grizzly bear before it knows how the Northern Rockies states and other federal agencies plan to manage it. It is unacceptable to proceed with delisting when the state and federal plans governing how this population will be managed are incomplete and therefore, unenforceable.			Post-delisting monitoring and management	Docket No. FWS-R6-ES-2016-0042 RE: Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. The historic comeback of the Yellowstone grizzly bear population is truly a remarkable achievement. But the current proposal threatens progress made to date. The Service is rushing to delist the grizzly bear before it knows how the Northern Rockies states and other federal agencies plan to manage it. It is unacceptable to proceed with delisting when the state and federal plans governing how this population will be managed are incomplete and therefore, unenforceable. Further, the Service's current proposal doesn't provide grizzlies with enough protections to ensure their long-term recovery. We can't afford to be careless with this species. There is no need to rush this process, but that's exactly what the Service appears to be doing. I call on the Service to put the proposed delisting rule on hold for the following reasons: 1) The Service needs to strengthen habitat protections and mortality limits in the proposed rule. 2) State and federal management plans detailing how this population will be managed are incomplete and must be updated to provide enforceable protections. 3) The Service must rectify inconsistencies that currently exist in the set of documents (the proposed rule, the recovery plan, and the conservation strategy) detailing how this population will be managed post-delisting. The Service continues to work with the state and federal agencies involved, it must prioritize the following: -Strong protections for the core population and habitat. -Restored connectivity with other grizzly bear populations by protecting bears in areas important to connectivity, allowing the population to continue to expand and securing habitat on public lands in between populations. -Continued and enhanced efforts to minimize conflicts between grizzly bears and people, thereby improving social tolerance and public acceptance for the bears throughout their range. -Adequate funding to support ongoing grizzly bear recovery. Idaho, Montana and Wyoming's state grizzly bear management plans must be revised to provide "adequate regulatory mechanisms" to conserve the species - a requirement of the Endangered Species Act. Wyoming has yet to finalize a revised grizzly bear state management plan, and the draft is not in line with important details of the Service's delisting proposal. Idaho and Montana have not yet set a public timeline for revising or allowing public review of revisions to their grizzly bear management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the "adequate regulatory mechanisms" they need. In addition, the Forest Service should allow for public review of any changes to the 2006 forest plan amendments. Currently the timeline for any such process is not public knowledge. Given that the Forest Service manages over 65 percent of suitable habitat in the ecosystem; this is a critical missing piece of the puzzle. Throughout the Northern Rockies, Defenders works closely with management agencies, other conservation groups and local residents to minimize conflict between bears and people. Since 1998, Defenders has invested over a million dollars on close to 300 on-the-ground projects including installing electric fencing around numerous bear attractants, purchasing bear resistant garbage containers for residents, and placing bear resistant food lockers in campgrounds. All of these	FWS-R6-ES-2016-0042-5524	

The Service must rectify inconsistencies that currently exist in the set of documents (the proposed rule, the recovery plan, and the conservation strategy) detailing how this population will be managed post-delisting.		Post-delisting monitoring and management	Docket No. FWS-R6-ES-2016-0042 RE: Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. The historic comeback of the Yellowstone grizzly bear population is truly a remarkable achievement. But the current proposal threatens progress made to date. The Service is rushing to delist the grizzly bear before it knows how the Northern Rockies states and other federal agencies plan to manage it. It is unacceptable to proceed with delisting when the state and federal plans governing how this population will be managed are incomplete and therefore, unenforceable. Further, the Service's current proposal doesn't provide grizzlies with enough protections to ensure their long-term recovery. We can't afford to be careless with this species. There is no need to rush this process, but that's exactly what the Service appears to be doing. I call on the Service to put the proposed delisting rule on hold for the following reasons: 1) The Service needs to strengthen habitat protections and mortality limits in the proposed rule. 2) State and federal management plans detailing how this population will be managed are incomplete and must be updated to provide enforceable protections. 3) The Service must rectify inconsistencies that currently exist in the set of documents (the proposed rule, the recovery plan, and the conservation strategy) detailing how this population will be managed post-delisting. The Service continues to work with the state and federal agencies involved, it must prioritize the following: -Strong protections for the core population and habitat. -Restored connectivity with other grizzly bear populations by protecting bears in areas important to connectivity, allowing the population to continue to expand and securing habitat on public lands in between populations. -Continued and enhanced efforts to minimize conflicts between grizzly bears and people, thereby improving social tolerance and public acceptance for the bears throughout their range. -Adequate funding to support ongoing grizzly bear recovery. Idaho, Montana and Wyoming's state grizzly bear management plans must be revised to provide "adequate regulatory mechanisms" to conserve the species - a requirement of the Endangered Species Act. Wyoming has yet to finalize a revised grizzly bear state management plan, and the draft is not in line with important details of the Service's delisting proposal. Idaho and Montana have not yet set a public timeline for revising or allowing public review of revisions to their grizzly bear management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the "adequate regulatory mechanisms" they need. In addition, the Forest Service should allow for public review of any changes to the 2006 forest plan amendments. Currently the timeline for any such process is not public knowledge. Given that the Forest Service manages over 65 percent of suitable habitat in the ecosystem; this is a critical missing piece of the puzzle. Throughout the Northern Rockies, Defenders works closely with management agencies, other conservation groups and local residents to minimize conflict between bears and people. Since 1998, Defenders has invested over a million dollars on close to 300 on-the-ground projects including installing electric fencing around numerous bear attractants,	FWS-R6-ES-2016-0042-5524	
I learned a great deal about the state of affairs of the Grizzly Bear population in my home, the Greater Yellowstone Ecosystem. I also heard a great deal of what I question is truly "best science available". This subjective term used to explain away certain "information", mostly about monitoring of these Grizzly Bears (who live in my backyard) left me feeling confused. I cannot understand certain rational which has been incorporated into this ruling. One area that astounds me is the Population Monitoring System. I do not know of any other arena, be it government budgets, wildlife management, business endeavors or a banking decision, where a 40% variance (F. van Manen, IGBST, November 4, 2016, Teton Village, Wyoming) in your baseline number is accepted as "best science available". This raises much concern. The original number IBSC has calculated will in fact be the foundation upon which the Great Grizzly Bear is managed for decades to come. We demand to know with 100% certainty that the accuracy of this baseline number is flawless. If IBSC does not have it exactly right from the beginning, it will have detrimental consequences for decades to come. A 40% variance is not acceptable in any situation, especially determining if and when Grizzly Bear are ready to be delisted.	1104	Post-delisting monitoring and management	purchase bear resistant traps we contained for residents and protect bear resistant food for birds in some yards. All of these for: Sally Jewell, Secretary, U.S. Department of the Interior Daniel Ashe, Director, U.S. Fish and Wildlife Service From: Linda Campbell, Grizzly Bear 760 Community, Wilson, Wyoming As a resident of Teton County, Wyoming, I had the privilege of attending the meeting of The Yellowstone Ecosystem Subcommittee of the Interagency Grizzly Bear Committee last November in Teton Village, Wyoming. During the two days of sessions I learned a great deal about the state of affairs of the Grizzly Bear population in my home, the Greater Yellowstone Ecosystem. I also heard a great deal of what I question is truly "best science available". This subjective term used to explain away certain "information", mostly about monitoring of these Grizzly Bears (who live in my backyard) left me feeling confused. I cannot understand certain rational which has been incorporated into this ruling. One area that astounds me is the Population Monitoring System. I do not know of any other arena, be it government budgets, wildlife management, business endeavors or a banking decision, where a 40% variance (F. van Manen, IGBST, November 4, 2016, Teton Village, Wyoming) in your baseline number is accepted as "best science available". This raises much concern. The original number IBSC has calculated will in fact be the foundation upon which the Great Grizzly Bear is managed for decades to come. We demand to know with 100% certainty that the accuracy of this baseline number is flawless. If IBSC does not have it exactly right from the beginning, it will have detrimental consequences for decades to come. A 40% variance is not acceptable in any situation, especially determining if and when Grizzly Bear are ready to be delisted. Next I fear the "opportunity" to hunt is driving the States plans (Wyoming, Idaho and Montana), rather than the "protecting and preserving of Grizzly Bears". I do not trust my own, or the other two, to properly manage an animal fresh of the Endangered Species List. It has been demonstrated again and again that the citizens of these three States, as well as the country at large, do not want to see Grizzly Bear managed down to the bottom line number. It terrifies me to think how quickly we could lose the foot hold the Bears barely have at this point in time. And then you add in the fact we really have no idea how many Bears there actually are. It would be completely in line with the "best science available" to not hunt Grizzly Bears. These Bears are a national treasure and it is beyond the pale to think that a Trophy Hunt is in their future. Most Americans will not tolerate seeing the much acclaimed "Recovered Grizzly Bear" population being trophy hunted. I do not feel any of the parties involved in preparing this ruling have done nearly enough to educate those living close to and with Grizzly Bears. Tolerance and acceptance is key to their survival. Grizzly Bears have a right to live on the same landscape as we do, and we the right to protect them from heading toward extinction, once again. And lastly, please acknowledge the many qualified scientists who completely disagree with the timing of this delisting ruling. I believe it to be a complete and utter travesty to read this ruling and see the contribution Dr. David Mattson has made to the IGBST and the entire Grizzly Bear recovery through his employment with them for so many years. He is not being given the platform needed to continue to share his invaluable expert analysis of the state of these Bears. Shameful. The IBSC should make available to Dr, Mattson and the scores of other scientists who are against this ruling, all raw data collected through the years. Thank You for your consideration to Not Delist Grizzly Bears at this time.	FWS-R6-ES-2016-0042-5494	

The Service continues to work with the state and federal agencies involved, it must prioritize the following:-Adequate funding to support ongoing grizzly bear recovery. Idaho, Montana and Wyoming's state grizzly bear management plans must be revised to provide "adequate regulatory mechanisms" to conserve the species - a requirement of the Endangered Species Act. Wyoming has yet to finalize a revised grizzly bear state management plan, and the draft is not in line with important details of the Service's delisting proposal. Idaho and Montana have not yet set a public timeline for revising or allowing public review of revisions to their grizzly bear management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the "adequate regulatory mechanisms" they need. In addition, the Forest Service should allow for public review of any changes to the 2006 forest plan amendments. Currently the timeline for any such process is not public knowledge. Given that the Forest Service manages over 65 percent of suitable habitat in the ecosystem; this is a critical missing piece of the puzzle. Throughout the Northern Rockies, Defenders works closely with management agencies, other conservation groups and local residents to minimize conflict between bears and people. Since 1998, Defenders has invested over a million dollars on close to 300 on-the-ground projects including installing electric fencing around numerous bear attractants, purchasing bear resistant garbage containers for residents, and placing bear resistant food lockers in campgrounds. All of these measures reduce the likelihood of lethal bear/human conflicts and increase human tolerance for the presence of bears on the landscape. Defenders will also continue to work to ensure that adequate protections remain on our public lands for grizzly bears both within recovery areas and in important areas between bear populations. The long term health and resiliency of the Yellowstone grizzly population will require its connectivity with other populations.			Post-delisting monitoring and management	Docket No. FWS-R6-ES-2016-0042 RE: Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. The historic comeback of the Yellowstone grizzly bear population is truly a remarkable achievement. But the current proposal threatens progress made to date. The Service is rushing to delist the grizzly bear before it knows how the Northern Rockies states and other federal agencies plan to manage it. It is unacceptable to proceed with delisting when the state and federal plans governing how this population will be managed are incomplete and therefore, unenforceable. Further, the Service's current proposal doesn't provide grizzlies with enough protections to ensure their long-term recovery. We can't afford to be careless with this species. There is no need to rush this process, but that's exactly what the Service appears to be doing. I call on the Service to put the proposed delisting rule on hold for the following reasons: 1) The Service needs to strengthen habitat protections and mortality limits in the proposed rule. 2) State and federal management plans detailing how this population will be managed are incomplete and must be updated to provide enforceable protections. 3) The Service must rectify inconsistencies that currently exist in the set of documents (the proposed rule, the recovery plan, and the conservation strategy) detailing how this population will be managed post-delisting. The Service continues to work with the state and federal agencies involved, it must prioritize the following: -Strong protections for the core population and habitat. -Restored connectivity with other grizzly bear populations by protecting bears in areas important to connectivity, allowing the population to continue to expand and securing habitat on public lands in between populations. -Continued and enhanced efforts to minimize conflicts between grizzly bears and people, thereby improving social tolerance and public acceptance for the bears throughout their range. -Adequate funding to support ongoing grizzly bear recovery. Idaho, Montana and Wyoming's state grizzly bear management plans must be revised to provide "adequate regulatory mechanisms" to conserve the species - a requirement of the Endangered Species Act. Wyoming has yet to finalize a revised grizzly bear state management plan, and the draft is not in line with important details of the Service's delisting proposal. 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The state of Montana should not be entrusted with the management of grizzly bears recovered from the brink of extinction in the lower 48 states using federal tax dollars. Grizzly bears are a federal treasure and should not be subject to Montana hunting under the aegis of an agency funded largely by licenses to kill wildlife they are "managing". Once delisted there will be a gleeful shooting gallery effect much like what the wolf is currently facing.	1100		Post-delisting monitoring and management	Do not remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. They are not fully recovered. They remain an isolated population vulnerable to genetic inbreeding. Not enough has been done to connect and protect habitat. Their population in the American West is a small fraction compared to what it was before European colonization. Historical food sources such as white bark pine and cut-throat trout are failing. We are unsure what other impacts climate change and human population pressure (human caused mortality is the single largest contributor to grizzly bear deaths) will make on grizzly bear food sources and habitat security. In light of that uncertainty we must proceed with caution. The state of Montana should not be entrusted with the management of grizzly bears recovered from the brink of extinction in the lower 48 states using federal tax dollars. Grizzly bears are a federal treasure and should not be subject to Montana hunting under the aegis of an agency funded largely by licenses to kill wildlife they are "managing". Once delisted there will be a gleeful shooting gallery effect much like what the wolf is currently facing. Ethical hunting is for putting food on the table. You don't eat carnivores. Trophy hunting will prevail, attracting the worst common denominator among hunters, polluting and devaluing the conservative western tradition of eating what you kill. Hunting bears in the fall as they prepare to hibernate will disrupt their energy gathering efforts. Hunting also can indirectly affect age and sex structure and the social organization of a population of bears. Grizzly bears are our neighbors. They share the planet with us. They deserve to exist unrelated to human comfort and convenience. They have intrinsic value simply because they are. A community is a place and all its creatures, including grizzly bears. Grizzly bears are an important "umbrella" species. As the grizzly bear goes so goes the rest of the biodiversity of an ecosystem. It's all connected.	FWS-R6-ES-2016-0042-5578	

Trigger Text			Code(s)	Full Comment Text	Form Letter/Document ID	Annotation Notes
If the given figures are correct, there are about 800 bears now, so they should NOT BE DE-LISTED yet. They were put on the Endangered Species list when there were 1600 bears. I was part of that. So when only 1600 Grizzlies were listed as endangered, how is it that 800 bears can be de-listed? That simply does not add up	402		Recovery	Dear Director Ashe, The restoration of the Yellowstone grizzly bear has been amazing Endangered Species Act success story, but I am concerned that the draft delisting rule and conservation strategy falls short of what is needed to protect grizzly bears and their habitat once federal protections are removed. I strongly urge you to strengthen the draft to ensure grizzly bear conservation will continue. When I visited Yellowstone in the early 1970s, there were 1600 Grizzly Bears in the Yellowstone area. Those numbers have gone down a lot, so I am wondering about this so called 'recovery' First, Grizzly bear habitat protections and demographic standards are too limited in geographic scope€they should be strengthened and extended throughout the Greater Yellowstone Ecosystem. Also, please require additional protections for bears and habitat in key areas that allow Yellowstone bears to connect to other bears. Secondly, please create a delay in the onset of any grizzly bear hunting for several years post-delisting to minimize mortality during the transition. Also, please permanently prohibit hunting in or near Yellowstone and Grand Teton National Parks to protect core habitat, as well as the bears that people see and love. Additionally, bear-human conflict resolution should emphasize nonlethal techniques, before lethal removal is allowed, throughout the entire Greater Yellowstone Ecosystem. Grizzly bears are a sensitive species and will always be conservation-reliant. Please ensure adequate commitments and funding for long-term grizzly bear monitoring and conservation are in place prior to delisting. If the given figures are correct, there are about 800 bears now, so they should NOT BE DE-LISTED yet. They were put on the Endangered Species list when there were 1600 bears. I was part of that. So when only 1600 Grizzlies were listed as endangered, how is it that 800 bears can be de-listed? That simply does not add up. Grizzly bears are an iconic animal in West€they are highly valued by photographers and wildlife viewers alike, and contribute significantly to the tourism economy of the region. Please strengthen the draft delisting plan to ensure that this Endangered Species Act success story endures for future generations of Americans to enjoy. Thank you. Sincerely,	Endangered Species Coalition	
Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered.	400		Recovery	I am writing to ask that you do not delist Yellowstone grizzly bears. Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered. Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. It is far, far to early in the bests recovery to delist them. It will be devastating to the fragile Yellowstone Ecosystem. I implore you to rethink this and do not realist the Bears. Thank you for you compassionate consideration.	Humane Society	
Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. It is far, far to early in the bests recovery to delist them.	400		Recovery	I am writing to ask that you do not delist Yellowstone grizzly bears. Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered. Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. It is far, far to early in the bests recovery to delist them. It will be devastating to the fragile Yellowstone Ecosystem. I implore you to rethink this and do not realist the Bears. Thank you for you compassionate consideration.	Humane Society	
The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not naturalrecovery.	400		Recovery	De-listing the Grizzly is a grievous error that threatens species diversity in the West: The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public. The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population. Research has also shown threshold population effects, which could mean that by the time the problem is detected, it is too late to fix the problem.	FWS-R6-ES-2016-0042-5203	

A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range.			Recovery	I am writing to ask that you do not delist Yellowstone grizzly bears. Grizzly bears in the Greater Yellowstone Ecosystem (GYE) have benefited greatly from Endangered Species Act (ESA) protections but are not yet recovered. Removing federal protections from this one small, isolated population and subjecting them to trophy hunting will not advance the conservation of this species. The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society	
All apex predators occupy an important niche and provide an important function toward keeping their ecosystem healthy. The truth of this scientific principle has been amply shown by the re-introduction of wolves to Yellowstone. When Grizzly bears have reached their optimal population, it will stop growing and, like the wolves, will stabilize. Yet, their current numbers suggest that Grizzly bears are far from recovered and need to maintain their ESA protections.			Recovery	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. All apex predators occupy an important niche and provide an important function toward keeping their ecosystem healthy. The truth of this scientific principle has been amply shown by the re-introduction of wolves to Yellowstone. When Grizzly bears have reached their optimal population, it will stop growing and, like the wolves, will stabilize. Yet, their current numbers suggest that Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	
A range of scientists have said that delisting is premature and Grizzly bears are far from recovered.			Recovery	Please protect these animals. There is no reason to lift protections from them. A range of scientists have said that delisting is premature and Grizzly bears are far from recovered. So, we need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	
The grizzly bears that live in and around Yellowstone make up almost half the population in the lower 48 states, and now those bears are at risk. In 2015, their numbers in the Yellowstone area declined by 40, to an estimated 717 from 757 -- a 6 percent drop that represents the highest one-year mortality since grizzlies were given federal protection in 1975. Despite this decline, the U.S. Fish and Wildlife Service is currently preparing to strip the animals of their Endangered Species Act protection.			Recovery	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. Preserving federal protections for grizzly bears is paramount to species' survival BY GARY CARTER SPECIAL TO THE DAILY CALLAST UPDATED APRIL 1, 2016 Comment 3 In 1805, the explorers Meriwether Lewis and William Clark, making their way across the West, were warned by Native American tribes of grizzly bears' awesome strength. At first, Lewis scoffed at the tribes' advice, writing in his journal that "in the hands of skillful riflemen they are by no means as formidable or dangerous as they have been represented." A few terrifying encounters with the bears, though, changed his mind about that. A little more than a century later, crowds at Yellowstone National Park would gather in delight to watch the bears dine on food scraps. Signs were marked "Lunch Counter ... for Bears Only." Those days are long gone, but crowds still flock to Yellowstone -- nearly 4 million visitors every year -- partly to catch a glimpse of the storied creatures. The grizzly bears that live in and around Yellowstone make up almost half the population in the lower 48 states, and now those bears are at risk. In 2015, their numbers in the Yellowstone area declined by 40, to an estimated 717 from 757 -- a 6 percent drop that represents the highest one-year mortality since grizzlies were given federal protection in 1975. Despite this decline, the U.S. Fish and Wildlife Service is currently preparing to strip the animals of their Endangered Species Act protection. The agency is under pressure from the states around Yellowstone -- Wyoming, Montana and Idaho -- to allow hunting of bears that roam outside the park's boundaries. Now, the proposal to call the bears recovered and remove their protection is imminent. If the rule is finalized, it's likely to allow states to reduce bear numbers by more than 100 practically overnight. But the bears are already struggling, threatened by declines in important foods such as white-bark pine and Yellowstone cutthroat trout, as well as by their isolation from other grizzly populations. Historically, grizzlies ranged from Alaska to Mexico, with at least 50,000 bears living in the western half of the contiguous United States. Today only about 1,500 to 1,700 grizzlies survive outside Alaska, in five isolated populations in the northern Rocky Mountains and the Cascades. Numbers in the Greater Yellowstone area have increased since the animals were first given federal protection, but they continue to be threatened by climate change and food shortages. Over all, grizzly bears still occupy only 2 to 4 percent of their ancient range in the lower 48 states. In June 2014, we filed a "recovery plan petition" asking the Fish and Wildlife Service to recover grizzlies in more of their historic range, including parts of Colorado and Utah; in December, we further petitioned to reintroduce bears into the Selway-Bitterroot Wilderness in Idaho. The Endangered Species Act requires that a species be protected in each "significant portion of its range" - the law's intent being not only to temporarily stave off extinction, but also to recover species so they can persist into the future. But the service has been systemically ignoring -- indeed actively working to redefine and thus dismantle -- this "significant portion of its range" requirement under both the George W. Bush and Barack Obama administrations. Dozens of native tribes have also been fighting to stop federal removal of protection, asserting it would violate the American Indian Religious Freedom Act. Tribal advocates for grizzlies feel disrespected or disenfranchised by the	Humane Society Petition	
Their recovery, along with that of the two other major predators in Greater Yellowstone, the wolf and the mountain lion, have been shown to have improved the health of the entire ecosystem. I hope that you will consider this argument and that, in the final vote, our federal government will stand behind continuing to protect this iconic species.			Recovery	Many have stated on social media and in articles concerning the subject that appealing to your office and the state governments of Idaho, Montana and Wyoming is a waste of time. As far as I am concerned, you are still part of the US Government and, as such, for the people. Therefore, I am confident that you will treat the concerns of all constituents with thoughtful consideration in this and all matters related to your work. Yes, grizzly numbers in the Greater Yellowstone Ecosystem have grown from a low near 150 before listing, to over 700. Seven Hundred.....not a large number by any means. Couple that with the facts that they are very slow to reproduce, have at best a 50% chance of making it to breeding age and their primary food sources are being devastated by climate change make this rebound in numbers tenuous at best. At this time, there is no economic or safety value to delisting. "Problem" bears are still handled on a case by case basis and economically, their value as a draw to the National Parks (Yellowstone and Teton) where they reside is estimated to be greater than \$10,000,000 per year. Any income gained by delisting and issuing hunting permits would be short lived and modest to nonexistent in comparison. The argument that trophy hunting will be economically important to saving the grizzly is arcane and outdated. One should also factor in the sentiments not only of our nation, but that of people from around the globe, many whom travel to the US annually for the chance of glimpsing one of these iconic bears. How can we ask other nations to conserve and protect their wildlife when we stop protecting ours? And, yes, they are a keystone species. Their recovery, along with that of the two other major predators in Greater Yellowstone, the wolf and the mountain lion, have been shown to have improved the health of the entire ecosystem. I hope that you will consider this argument and that, in the final vote, our federal government will stand behind continuing to protect this iconic species.	Humane Society Petition	

But the service has been systemically ignoring -- indeed actively working to redefine and thus dismantle -- this "significant portion of its range" requirement under both the George W. Bush and Barack Obama administrations.			Recovery	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. Preserving federal protections for grizzly bears is paramount to species' survival BY GARY CARTER SPECIAL TO THE DAILY CALLAST UPDATED APRIL 1, 2016 Comment 3 In 1805, the explorers Meriwether Lewis and William Clark, making their way across the West, were warned by Native American tribes of grizzly bears' awesome strength. At first, Lewis scoffed at the tribes' advice, writing in his journal that "in the hands of skillful riflemen they are by no means as formidable or dangerous as they have been represented." A few terrifying encounters with the bears, though, changed his mind about that. A little more than a century later, crowds at Yellowstone National Park would gather in delight to watch the bears dine on food scraps. Signs were marked "Lunch Counter ... for Bears Only." Those days are long gone, but crowds still flock to Yellowstone -- nearly 4 million visitors every year -- partly to catch a glimpse of the storied creatures. The grizzly bears that live in and around Yellowstone make up almost half the population in the lower 48 states, and now those bears are at risk. In 2015, their numbers in the Yellowstone area declined by 40, to an estimated 717 from 757 -- a 6 percent drop that represents the highest one-year mortality since grizzlies were given federal protection in 1975. Despite this decline, the U.S. Fish and Wildlife Service is currently preparing to strip the animals of their Endangered Species Act protection. The agency is under pressure from the states around Yellowstone -- Wyoming, Montana and Idaho -- to allow hunting of bears that roam outside the park's boundaries. Now, the proposal to call the bears recovered and remove their protection is imminent. If the rule is finalized, it's likely to allow states to reduce bear numbers by more than 100 practically overnight. But the bears are already struggling, threatened by declines in important foods such as white-bark pine and Yellowstone cutthroat trout, as well as by their isolation from other grizzly populations. Historically, grizzlies ranged from Alaska to Mexico, with at least 50,000 bears living in the western half of the contiguous United States. Today only about 1,500 to 1,700 grizzlies survive outside Alaska, in five isolated populations in the northern Rocky Mountains and the Cascades. Numbers in the Greater Yellowstone area have increased since the animals were first given federal protection, but they continue to be threatened by climate change and food shortages. Over all, grizzly bears still occupy only 2 to 4 percent of their ancient range in the lower 48 states. In June 2014, we filed a "recovery plan petition" asking the Fish and Wildlife Service to recover grizzlies in more of their historic range, including parts of Colorado and Utah; in December, we further petitioned to reintroduce bears into the Selway-Bitterroot Wilderness in Idaho. The Endangered Species Act requires that a species be protected in each "significant portion of its range" -- the law's intent being not only to temporarily stave off extinction, but also to recover species so they can persist into the future. But the service has been systemically ignoring -- indeed actively working to redefine and thus dismantle -- this "significant portion of its range" requirement under both the George W. Bush and Barack Obama administrations. Dozens of native tribes have also been fighting to stop federal removal of protection, asserting it would violate the American Indian Religious Freedom Act. Tribal advocates for grizzlies feel disrespected or disenfranchised by the	Humane Society Petition	
Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.			Recovery	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. We need to see more progress in the recovery of bear populations, and it may be that the protections can never be removed. Human encroachment is devastating on all wild species. I urge you to act so that future generations will be able to appreciate this majestic creature-- not just trophy hunters.	Humane Society Petition	
They are not recovered enough to all more recovery. States have proven they are not qualified to manage wildlife. Wyoming and Montana wildlife services are notorious in killing bears, mountain lions, etc instead of relocating to better areas.			Recovery	It is the responsibility of U.S. Fish and Wildlife Service to protect our wildlife..NOT to decimate them for someone to hang their heads on their walls. Please, Please continue to protect Grizzly Bears. They are not recovered enough to all more recovery. States have proven they are not qualified to manage wildlife. Wyoming and Montana wildlife services are notorious in killing bears, mountain lions, etc instead of relocating to better areas. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area.	Humane Society Petition	
We need to see more progress in the recovery of bear populations, and it may be that the protections can never be removed.			Recovery	The federal government spent years trying to add bears to the population, only to now turn around and let states give trophy hunters the green light to start killing them. A range of scientists have said that delisting is premature. The grizzly bear population in the lower 48 states is less than two percent of their pre-settlement population and occupy an insignificant proportion of their pre-settlement range. Grizzly bears are far from recovered and need to maintain their ESA protections. Please do not remove federal protections from grizzly bears in the GYE area. We need to see more progress in the recovery of bear populations, and it may be that the protections can never be removed. Human encroachment is devastating on all wild species. I urge you to act so that future generations will be able to appreciate this majestic creature-- not just trophy hunters.	Humane Society Petition	Establish protection that can never be lifted so that recovery will be successful.
Currently lifting the grizzly bear from the endangered listing would be very premature, for this animal has not sufficiently regained any semblance of recovery.			Recovery	Thank you for the opportunity to provide comments on the proposed delisting of grizzly bears in the Greater Yellowstone Ecosystem from the Endangered Species List. Currently lifting the grizzly bear from the endangered listing would be very premature, for this animal has not sufficiently regained any semblance of recovery. Before finalizing the proposed rules, please consider the following: * Give National Park Service managers a formal role in the management of the bears on the habitat adjacent to park borders. Always fully address their concerns no matter how small you might deem they would be. Ensure there are measures in place to protect bears that roam beyond national park boundaries. Hunting inside National Park Service legislative boundaries, on park-adjacent lands, and in key habitat connectivity corridors must be strictly prohibited in the proposed plan and the individual state management plans. * There must always be a totally safe and natural connection to the bear populations between Yellowstone, Glacier National Park and all other areas of present habitat. In order to have a return to natural levels, the bears must not be contained. * As always, continue to provide the general public with the complete plan that will be made over the grizzly bears' management and protection. Also include the long-term plan that will be envisioned for this animal's health. Please include the details for any management changes if any authority is given to the state agencies. Once more, the time is way too early to remove the grizzly bear for the endangered status. Until said time arrives continue to allow this animal to regain its natural existence. Thank you for the opportunity to comment on this very important matter.	NPCA	
How do they even determine a 'recovered population'? What does that even mean.			Recovery	How do they even determine a 'recovered population'? What does that even mean. Imagine a specie putting that tag on us humans.	WELC	
If delisted, grizzlies in Montana, Idaho, and Wyoming would face being hunted and killed for the first time in 40 years. Grizzlies are iconic wildlife in the American West critical to the health of the West's ecosystems. Their population has not fully recovered; and so long as the animals' survival is threatened, all grizzlies require continued Endangered Species Act protection.			Recovery	We oppose your proposal to strip grizzly bears in the Greater Yellowstone Ecosystem of their Endangered Species Act protection. If delisted, grizzlies in Montana, Idaho, and Wyoming would face being hunted and killed for the first time in 40 years. Grizzlies are iconic wildlife in the American West critical to the health of the West's ecosystems. Their population has not fully recovered; and so long as the animals' survival is threatened, all grizzlies require continued Endangered Species Act protection.	WELC	

Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish			Recovery	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? - Bears are facing an uncertain future. Last year alone 43 bears were killed in conflicts, most of which were food related deaths.	FWS-R6-ES-2016-0042-0320	
It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. A			Recovery	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? - Bears are facing an uncertain future. Last year alone 43 bears were killed in conflicts, most of which were food related deaths.	FWS-R6-ES-2016-0042-0320	
In the 40 years grizzlies were protected under the Endangered Species Act, the population rose from 136 to an estimated 720 individuals in the GYE. While this should be celebrated, it should not mean that safeguards for grizzly bears are removed and sport hunts are commended. This past year, the Interagency, Grizzly Bear Committee study team reported 59 known and probable grizzly bear mortalities, 55 of which were human caused. How can our GYE grizzly bear population sustain this in addition to added mortalities as a result of state level hunts that would occur upon delisting?			Recovery	See Attached Attachments Sheehy Pike Lisa	FWS-R6-ES-2016-0042-0522	USFWS definition of recover.
Grizzly bear populations have rebounded and are no longer threatened with extinction. We need to move on and use the money spent on grizzly bears on other more threatened species. When the public discourse becomes about "warm and fuzzies" instead of established science, we've crossed over the intent of the ESA. USFWS has done everything the courts have required, now let's allow them to dedicate their resources to more pressing matters.			Recovery	At some point, the public needs to come to terms that the ESA worked in this instance. Grizzly bear populations have rebounded and are no longer threatened with extinction. We need to move on and use the money spent on grizzly bears on other more threatened species. When the public discourse becomes about "warm and fuzzies" instead of established science, we've crossed over the intent of the ESA. USFWS has done everything the courts have required, now let's allow them to dedicate their resources to more pressing matters.	FWS-R6-ES-2016-0042-5009	

These plans often involve target population numbers based on federal recovery goals, which should be considered minimums, and in no state is the plan to increase grizzly population numbers or increase habitat quality and acreage or decrease habitat fragmentation. Including areas of continued recovery (e.g., increasing grizzly habitat and population numbers) should be required for each state management plan in order for the federal government to consider delisting. One only has to consider the delisting of the gray wolf in these states to realize the strange partnership between the state agencies and the hunting and ranching communities.			Recovery	The real issue in this situation is that the public does not trust state agencies to manage grizzly bear populations with regard to all stakeholders. With a reputation for bowing to the hunting and ranching communities, the state agencies of MT, WY, and ID have not proven that they can manage wildlife in any manner other than establishing trophy hunting seasons immediately upon delisting in order to satisfy a small proportion of the state's citizens. These plans often involve target population numbers based on federal recovery goals, which should be considered minimums, and in no state is the plan to increase grizzly population numbers or increase habitat quality and acreage or decrease habitat fragmentation. Including areas of continued recovery (e.g., increasing grizzly habitat and population numbers) should be required for each state management plan in order for the federal government to consider delisting. One only has to consider the delisting of the gray wolf in these states to realize the strange partnership between the state agencies and the hunting and ranching communities. Many stakeholders are involved and concerned with state wildlife management and currently state agencies do not seem to realize this in any way. Delisting grizzly bears seems to be based on sound science. However, habitat loss, conflicts with humans, and climate change remain concerns for grizzly bear populations into the future. The state agencies dismiss these concerns by proposing hunting seasons immediately upon a delisting ruling and the states have not acknowledged that recovery of any species occurs along a gradient. A conservative state management approach would consider future impacts to a long-lived species with slow reproduction and also consider the values of the non-hunting and ranching stakeholders. Unless state agencies can prove to the public that the opinions of all of their citizens are being considered, issues related to the Endangered Species Act, both listing and delisting will persist. The only way this can be mitigated for the grizzly bear is to deny delisting until the state management plans are written in a way that promotes grizzly populations while considering future human-caused changes to the ecosystem and also the opinions and values of all stakeholders weighted to their prevalence in their home state.	FWS-R6-ES-2016-0042-5015	
I fully support the removal of the Greater Yellowstone ecosystem population of grizzly bears from the federal list of endangered and threatened wildlife. We must have science-based conservation, and the science has shown this population is recovered and the ecosystem is at carrying capacity. The recovery of this bear has been a huge success. The predetermined Recovery Criterion has been met and everything has been done to justify a delisting of this bear. It is time the state manages the species for sustainability.			Recovery	I fully support the removal of the Greater Yellowstone ecosystem population of grizzly bears from the federal list of endangered and threatened wildlife. We must have science-based conservation, and the science has shown this population is recovered and the ecosystem is at carrying capacity. The recovery of this bear has been a huge success. The predetermined Recovery Criterion has been met and everything has been done to justify a delisting of this bear. It is time the state manages the species for sustainability.	FWS-R6-ES-2016-0042-0055	
I fully support removing the greater Yellowstone ecosystem population of grizzly bears from the list for both practical reasons of coexisting with bears and from a biological standpoint. Without going in to regurgitating data to support my statement I will just say I know that the professional biologists from USFWS would not make such a proposal if there were not sufficient evidence to warrant doing so.			Recovery	I fully support removing the greater Yellowstone ecosystem population of grizzly bears from the list for both practical reasons of coexisting with bears and from a biological standpoint. Without going in to regurgitating data to support my statement I will just say I know that the professional biologists from USFWS would not make such a proposal if there were not sufficient evidence to warrant doing so. I also know that the states involved are fully capable of managing the bears without risk of taking a step backward in terms of maintaining a viable population in the Yellowstone ecosystem or achieving recovery in other ecosystems. As far as concerns about the bears becoming genetically isolated first of all I would point out that a slight reduction of bears (if there even is) within the Yellowstone ecosystem is not going to have any affect. I would think genetic diversity within the Yellowstone ecosystem relies on transient animals from other ecosystems arriving in the Yellowstone ecosystem, keeping in mind that these transient animals will still be fully protected until their arrival I believe the delisting would have almost no affect in this regard. Having lived in close proximity to grizzlies from other ecosystems all my life I find it abundantly evident that they are recovering and dispersing and have no doubts genetic diversity is not in any danger from the proposed rule, if anything perhaps a slight reduction in the Yellowstone population may be beneficial in this regard as it would make room for transient animals to establish territories and eventually interbreed with the existing population. Knowing many people who live and recreate in the Yellowstone ecosystem I am shocked at how many tell me about frequent encounters with these bears. I am convinced the reason that the bears so commonly show little or no fear of humans is that management policies have prohibited people from engaging in activities which discourage bears from interaction with humans, including defense of life and property in all but the most dire of circumstances. Bears are very capable of learning from their experiences and I believe their behavior will change in a positive way resulting in less conflict if the proposed rule is adapted, this will be good for the bears in the long term, if sows teach their young to avoid humans rather than being indifferent to them, or worse yet seeking them out, more cubs will survive. While on the subject of cub survival I would also like to point out that if regulated hunting was established in any portion of the ecosystem it also has the potential of benefiting overall cub survival rates as well by reducing the number of mature boars which are known to kill cubs given the opportunity, in addition to helping restore a healthy fear of humans in all the bears. In reality state regulated hunting would provide funds for conservation efforts and create a better public perception of the bears as well as state and federal management agencies within the communities directly affected. Financially the proposed rule has many benefits both for government agencies as well as citizens. Federal managers would no longer be tasked with providing protection to a population segment that quite frankly has no more room to grow. State managers would no longer be tasked with monitoring a population they are forbidden from managing as a resource. Private citizens could potentially benefit in many ways including less loss of personal property and perhaps even revenue generated by regulated hunting. I believe that regardless of what biological evidence is produced to show that the recovery has been successful there will always be a certain group of activist minded people and organizations who will oppose delisting. This can be clearly seen when looking at recent efforts by activist groups on behalf of protecting wolves, the wolf story is one of rapid re-population of an enormous area. their ability to reproduce has been documented on an unprecedented scale. however the cries from activists continue. On that	FWS-R6-ES-2016-0042-0075	

This is a complex issue as are the consequences of this amazing animal losing their endangered protection. The final answer as to why the Yellowstone Grizzly should not be removed is clearly because the species is not recovered. Instead of delisting, with all the time, money, and effort spent to bring back the bear from extinction, more money and time needs to be spent educating the growing human population on living in bear territory. Currently, the #1 cause of bear mortality still stems from conflicts with people.			Recovery	To Secretary of the Interior Ms. Sally Jewell, I am writing to you about the issue of the U.S. Fish and Game Department's decision to remove the Yellowstone Grizzly Bear aka Brown Bear off the Federal Endangered Species Protection list. This is a complex issue as are the consequences of this amazing animal losing their endangered protection. The final answer as to why the Yellowstone Grizzly should not be removed is clearly because the species is not recovered. Instead of delisting, with all the time, money, and effort spent to bring back the bear from extinction, more money and time needs to be spent educating the growing human population on living in bear territory. Currently, the #1 cause of bear mortality still stems from conflicts with people. A secondary unforeseen problem that has reared its ugly head in recent years is the misinformation campaign of certain US agencies as well as one sided mainstream media stories. For example, government agencies and U.S. newspaper articles have claimed that the Yellowstone Bear population has increased and even doubled since the last time the US Fish and Game tried to remove the bear in 2006. In dissent of this opinion, a recent annual report compiled by Dr. David Mattson from the Interagency Grizzly Bear Study Team concludes that the Yellowstone Grizzly population has not only not grown since 2002, it has actually declined since 2007. This effort to misinform the public is both disturbing and problematic because the American people are not getting the truth. Let it be known that I wish to only focus on a few important points in this letter as opposed to the many reasons as to why delisting the Yellowstone Bear is the wrong move at this time. Female bears if healthy only have litters about every 3 years and do not reproduce easily. The Yellowstone Bear population has been isolated for over 100 years and some evidence suggests that the population is suffering from the effects of inbreeding. The Brown Bear currently occupies about 1% of their historic range prior to Europeans settling the United States. While there is available habitat suitable for Brown Bears that could be used to connect the few remaining populations in the lower 48 states, the current plan calls for flying or driving male brown bears to Yellowstone in order to mate and improve their genetic diversity. Again, this is a wrong-headed move unless given no other choice to sustain a healthy population. Currently, ranchers and farmers are compensated for the loss of domesticated animals by Yellowstone Bears. While some ranchers are working out their differences peacefully with grizzly bears, others are not. For that reason, federal oversight is still necessary. The issue of climate change as it relates to the loss of the bear's food sources must also be addressed. U.S. Fish and Wildlife Service has claimed that it's OK to delist the Grizzly now, even though it has lost 2 of their 4 major food sources because of climate change and invasive species. Warming temperatures are expected to remove the summer alpine haunts of one of the other remaining key foods: army cutworm moths. In the face of an unraveling ecosystem, bears have been turning to the dangerous practice of eating more meat. Unsustainable numbers of bears are being killed as result of conflicts with incautious big game hunters and ranchers. More needs to be done to reduce conflicts, not less. Lastly, another consequence of delisting the brown bear is that they will once again be hunted. States surrounding Yellowstone have already announced the bear will once again be hunted. Hunting the bear is exactly what caused the Yellowstone Bear to need FESP in the 1st place. While most people would rather take a photograph of a bear as opposed to shooting it, trophy hunting brown bears translates to state hunting license revenues. Grizzly Bear hunts will negatively impact this un-recovered species. Hopefully, the Yellowstone Grizzly can one day be delisted for the right reasons. However, removal at this time would most definitely jeopardize the Brown	FWS-R6-ES-2016-0042-0008	
40 years and millions of dollars were spent to recover them from a little over hundred to just over 700. That took 40 YEARS!! Why so quick to delist? What is the point of recovery if you turn around and kill without letting the effects of recovery sink in for 10 years or so?			Recovery	I am against the delisting of grizzly bears. Grizzlies are the slowest reproducing mammal in the world. 40 years and millions of dollars were spent to recover them from a little over hundred to just over 700. That took 40 YEARS!! Why so quick to delist? What is the point of recovery if you turn around and kill without letting the effects of recovery sink in for 10 years or so? And with climate change happening, you haven't given them a fair chance. Predators are essential in the circle of life...you take them away and the ecosystem crumbles downward. Hunting predators is counterproductive and foolish. I am strongly against the delisting. This decision is wrong and does not listen follow what science says. Keep Grizzly Bears Listed!! Thank you	FWS-R6-ES-2016-0042-0336	
Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range			Recovery	I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Bears ranging north outside the Demographic Recovery Area will not be counted and those are the bears that would enlarge the GYE gene pool. - Yellowstone's population of roughly 750 grizzly bears is completely isolated from all other grizzly bear populations and much smaller than the 2000+ animals widely considered necessary for long-term viability. Moreover, the Yellowstone population is, along with grizzlies to the north, a mere 1-2% of the roughly 100,000 grizzly bears that once roamed the Contiguous U.S. in a range that was formerly 100 times larger. - The Yellowstone population continues to be jeopardized by increasing regional human populations, energy development, problematic livestock husbandry practices, habitat degradation caused by climate warming, hostile state management, and unreliable methods for monitoring status and trends. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Reinstating a hunt prematurely risks a decline in numbers as hunt most likely will exceed reproduction rates. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, cutthroat trout and especially Whitebark Pine nuts, diminish. - Claims by the USFWS that the Yellowstone grizzly bear has grown at a substantial rate for several decades are unsubstantiated. Although some growth has likely occurred, it is much more modest than advertised, and population decline is probably occurring now as a result of high mortality linked to deteriorating habitat conditions. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned. - Population could be reduced to 600 bears (500 bears in Wyoming) before "discretionary" (hunting, management "removals" etc.) mortality would be curtailed. - Compared to other large carnivores, grizzly bears will be much more vulnerable to the effects of state-sponsored sport hunting, and much less able to recover from predictable hunting excesses designed by state agencies to benefit elk and moose populations. And, without doubt, colonization of new ranges will be the first casualty of state management. - Population will no longer be allowed to grow - population is now being managed for stability, not growth. - Population will not be allowed to expand southward in Wyoming (at least under the state's current management plan) i.e. Wyoming Range, southern Winds, Salt River Range - We just spent 40 years and millions of dollars to increase the bear population from 125 to 725 (see how slow reproduction is!). With the climate changing so fast (this is the warmest winter on record), and food sources changing for bears, why are we rushing into delisting. Why not wait another 5-10 years for the science to reveal more data? - Bears are facing an uncertain future. Last year alone 43 bears were killed in conflicts, most of which were food related deaths.	FWS-R6-ES-2016-0042-0320	

We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best: Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data.			Recovery	We have lived, worked and recreated in the Greater Yellowstone Ecosystem (GYE) for almost 40 years, meeting working in Yellowstone National Park. We have explored by foot thousands of miles of trails into some of the most breathtaking landscapes on earth, filled with the suite of native wildlife that we so love and respect. We have seen many grizzly bears over the decades and no animal is more powerful in the public's sensibility than the Great Bear. It is our state animal, picked by Montana school children. Our native tribes greatly value the grizzly bear as do all of us who value our wild places and wildlife. The grizzly bear is greater than life; it represents all that we as a people almost lost and what we have preserved. We value our large predators, our carnivores, because they remind us that we share life together in this time and place. They represent the wilderness we almost lost. We believe the grizzly bear should not be removed from the Endangered Species Act (ESA) list because its recovery is tenuous at best: Because the science used is suspect; some data is unreliable and biased; the public is not given access to the data. Because the ecosystem is becoming stressed by climate change causing dramatic changes in food supplies needed. Because all foods are not equal. Because grizzlies are being killed at a rate the slowly-reproducing animals cannot tolerate long-term; since 2002 the population has probably declined. Because connectivity with other bears depends upon GYE grizzlies roaming and hunting would preclude that. Because human caused mortality is mostly avoidable and prevention is not stressed enough. Because state wildlife management agencies are anti-carnivore, some more so than others; these agencies do not have the money or the will to effectively manage grizzly bears; they rely on hunters for funding and thus are biased for hunting at any cost. Because this agreement with the states is unenforceable. Because sport trophy hunting of grizzly bears would be abhorrent and would reverse recovery. Because tolerant bears that people see around the parks would be the first killed. Because wildlife watchers are ignored by state wildlife agencies and the USFWS. Just look at wolf and bison management. Because tribal interests are ignored by state wildlife agencies. Because wildlife watching brings in far more economically than does hunting in GYE states. Because listing the grizzly as a distinct population segment (DPS) is possibly illegal, because it precludes the bears seeking connectivity. Because the GYE grizzly bear lives on an ecological island. Because politics trumps science every time. We love our grizzly bears and want them protected from nefarious forces bent upon hunting them. USFWS should listen to the public's concerns, listen to opposing scientists and do the right thing. Do not delist the grizzly bear.	FWS-R6-ES-2016-0042-0422	
FWS claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally.			Recovery	The U.S. Fish and Wildlife Service (FWS) wants to strip Endangered Species Act protection from the Greater Yellowstone Ecosystem grizzly bear. We have only until May 10 to comment on the FWS proposal. FWS claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." FWS claim: The shortage of cutthroat trout and white bark pine nut two of the grizzly's primary food sources is not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. FWS claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. FWS claim: Their agency will stay involved with protecting the grizzly population after delisting. The reality: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. FWS claim: The agency will monitor grizzly numbers to make sure they stay at sustainable levels after delisting. The reality: When David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, looks at the future after delisting, he sees the grizzly population tumbling to dangerously low levels. He told Montana Public Radio that if we looked two years into the future "the grizzly population will be down to 600, at which point, even by FWS reckoning there	FWS-R6-ES-2016-0042-5043	
Grizzly bears are not recovered across their historic range.			Recovery	The USFWS is pushing to delist the Yellowstone grizzly bears. It's obvious why they're doing this. Trophy hunters are itching for a grizzly bear hunt to satisfy their blood lust and ego's and the USFWS is perfectly happy to make their dreams come true. Please don't allow this to happen. They're not just after grizzlies in the Yellowstone ecosystem but Montana is already pushing for the delisting of all grizzly bears, specifically the great bear population in Northwest Montana. Please take a moment and speak out for this iconic species. They are voiceless, we must speak for them! Follow the link to the USFWS comment page and stand up for the grizzly bear. Points to make: 1. Grizzly bears have one of the lowest reproductive rates of any large mammal. That's because grizzly mothers keep their cubs with them for up to three years. It takes a long time to learn how to be a successful grizzly bear. This means any grizzly bear hunts could quickly decimate their population. 2. Grizzly bears are not recovered across their historic range. 3. Yellowstone grizzlies would be sitting ducks since they are habituated to people. The most famous female grizzly alive, iconic mother grizzly bear number 399, would be threatened by the delisting. == The Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife	FWS-R6-ES-2016-0042-5087	

The reported facts and research, compiled by different researchers, is conflicting, to say the least, in regards to defining the current Grizzly Bear population as recovered.			Recovery	I am writing to implore you to stop the proposed delisting of the Grizzly Bear in the Greater Yellowstone Ecosystem from the Federal List of Endangered and Threatened Wildlife. The reported facts and research, compiled by different researchers, is conflicting, to say the least, in regards to defining the current Grizzly Bear population as recovered. Facts will always be conflicting as scientists view their data through their lens of their inquiry. We all have a way we see the world and it profoundly influences the actions we take. Call it the uncertainty principle or the observer effect from quantum physics. Although people try to do their best, I believe it is not possible to be completely objective in how they interpret their research. That's why it's important to listen to other's perspectives and take into consideration what they, too, are observing. So what we are left with is always the intention and motivation of those interpreting the data. That's where the true wisdom comes in. Delisting is not feasible or desirable at this time for many reasons. Grave uncertainty being the main one. Uncertainty about the ongoing unpredictable effects of climate change and how that unfolding story will influence the food choices and survival of the Grizzly Bears. Uncertainty about the increased pressures of expanding human populations on the Grizzly families as more and more people move west, encroaching on their territory. That increased human presence, gobbling up the land, is only pressuring the Grizzlies into closer human contact, year by year. And lastly, the uncertainty of the unpredictable behavior of humans who seek to kill a Grizzly for sport or vengeance if Grizzly Bears are no longer protected under federal law. Threats have already been made by some to seek out and intentionally kill one of the most famous Grizzly Bear mothers, 399, in Grand Teton National Park. Yes, progress has been made, but the conditions on the ground have changed dramatically since the IGBC was set in motion almost three decades ago. It is important to base this decision to potentially delist on the ground-truthing of this present century, not in goals of past decades when this Committee was first given this honorable task of recovering the at-risk populations. It is important for you to at least consider that it may never be wise or safe to delist the Grizzly Bear. And that does not constitute failure. That represents wisdom. I thank you for your service in regards to the leadership that has been entrusted to you, by all of us, the Public trust, to safeguard the well-being of our Greater Yellowstone Grizzly Bear population. Please don't take hasty actions to delist them, based on short-term reasons such as procedure, protocol or personal legacy. I implore you to consider the long-view, which is solely your responsibility, and in your hands, as wise leaders and elders. Thank you for your crucial consideration to halt delisting process at this time. May it be so. Thank you. Lyn Dalebout	FWS-R6-ES-2016-0042-5132	
Grizzly bear recovery has been a slowly successful, long-term process for the Interagency Grizzly Bear Study Team; they should be proud of their efforts. But I don't believe there is scientific consensus that the species is beyond the need for protection. And I don't believe there is agreement among all interests that the grizzly population is stable enough to withstand hunting.			Recovery	I am writing to say I do not support the USFWS plan to delist the grizzly bear. Grizzly bear recovery has been a slowly successful, long-term process for the Interagency Grizzly Bear Study Team; they should be proud of their efforts. But I don't believe there is scientific consensus that the species is beyond the need for protection. And I don't believe there is agreement among all interests that the grizzly population is stable enough to withstand hunting. The USFWS states in a their press release from March 3, 2016 that delisting does not solely rely on numbers but also includes "the quantity and quality of habitat, adequate regulatory mechanisms to maintain a healthy and viable population, and a good balance of male and female bears that are well-distributed throughout the ecosystem." I believe all of these factors are unresolved and continue to place the grizzly bear at risk. 1) Quantity/quality of habitat. Climate change and development pressure continue to impact grizzly bear food sources and habitat. Traditional food sources (whitebark pine, cutworm moths, cutthroat trout) are threatened by climate change and invasive species. Development continues to fragment the edges and connectivity of core grizzly bear range. Management needs to aggressively protect habitat including limiting development and road densities in core areas. USFWS needs to work with states and other land management agencies to ensure long-term habitat protection. 2) Regulatory mechanisms. There are not adequate regulatory mechanisms in place to guarantee grizzly populations are maintained, especially if hunting is allowed. USFWS and states need to set strict caps on grizzly mortality and ensure mechanisms and funding are in place to reduce human-bear conflict. 3) Bear distribution. Scientists and concerned citizens have always maintained that in order to ensure a strong and stable population there must be a genetic connectivity to other grizzly populations in the Northern Rockies. I am concerned that pressure from hunting and other human-bear conflict will continue to isolate the Greater Yellowstone population. On an emotional and intellectual level I just don't believe an iconic animal such as the grizzly bear should be hunted. If they were restored to their historic range and allowed to roam the Rocky Mountains, the Great Plains and the Central Valley I might feel differently, but that is never going to happen. I think there is too much risk of increased mortality to bears if a spring and fall hunting season is opened. Finally, I don't think delisting is an appropriate tool of adaptive management when applied to conservation biology. I'm not sure it works well within the regulatory framework of the Endangered Species Act. It is too coarse, too slow, and does not allow for versatile adaptability. I think it will be much more challenging to relist the grizzly than it is to delist (which is proving challenging enough). The numbers might look good at this moment in time but I'm worried about the long-term trend, with unresolved pressure from climate change and habitat fragmentation, on the stability of the grizzly bear.	FWS-R6-ES-2016-0042-5158	

This document thoroughly discusses the history of the grizzly bear species, it's habitat, nutritional needs, and challenges to it's continued survival. It reviews the history of the recovery process and sites volumes of reports and analysis, by experts in the field, of the ongoing status of the grizzly. Recovery criteria were established and indeed met and maintained since 2004.			Recovery	I support delisting the GYE population of grizzly bears from the Federal List of Endangered and Threatened Wildlife. After a review of document FWS-R6-ES-2016-0042, Proposed Rule; Endangered and Threatened Species, Exports, Imports, Reporting and Recordkeeping Requirements, Transportation, I am convinced we can confidently move ahead with the de-listing. This document thoroughly discusses the history of the grizzly bear species, it's habitat, nutritional needs, and challenges to it's continued survival. It reviews the history of the recovery process and sites volumes of reports and analysis, by experts in the field, of the ongoing status of the grizzly. Recovery criteria were established and indeed met and maintained since 2004. As science has evolved and improved, so has our understanding of the important aspects of grizzly management. Also, based on the best scientific and commercial data available it is clear that the GYE grizzly bear population is discrete from other grizzly bear populations and significant to the remainder of the taxon and meets the definition of a DPS under the act. Regarding the issue of whitebark pine nuts, as part of the grizzly bear diet, I site the Food Synthesis Report (IGBST 2013). Grizzly Bears are extremely omnivorous and display great diet plasticity, shifting and switching food habits according to their availability. There are over 260 species of foods consumed by grizzly bears in the GYE. This ability to eat a wide variety of foods makes them a generalist species. After years of studies, new feeding strategies have continued to appear annually. While whitebark pine seed has been identified as one of the components of a grizzly bear's diet, which can indeed influence reproductive and survival rates. However, it has been revealed through study that there is no correlation between long term survival with a decline in whitebark pine availability. The report found that grizzly bear selection of white bark pine nuts had actually decreased between 2000 and 2011. Movement rates had not changed, as well as body size and condition during times of decreased availability of the nut. There continued to be a consistent litter size following poor white bark pine years. Nearly one third of grizzly bear home ranges in the GYE do not contain any whitebark pine. Grizzly bears have shown themselves to be very resilient and adaptable! Over the years, grizzly bear recovery has been developed, revised and modified according to new scientific studies, data and methods. The grizzly bear recovery story is truly one of success, that represents the hard work of many people, using the best science available. This will not end with the de-listing! In this proposed rule, if finalized, there is ongoing biological review of the status of the grizzly bears and detailed rules and parameters allowing for emergency re-listing if necessary. The 2016 Conservation Strategy identifies and provides an ongoing framework for managing habitat and demographic parameters. A very detailed plan is put forth in this document for implementation and funding. Furthermore this document examines the five different factors that threaten a species and, given the rigorous scientific monitoring protocols established for the GYE grizzly bear population, we can expect to fully protect them in the future.	FWS-R6-ES-2016-0042-5171	
When USFWS wrote its first implementing regulation for the E.S.A., it interpreted the law and congressional intent to require restoration to historic ranges. This interpretation remained in place for over thirty years until the Bush Administration ILLEGALLY tried to reinterpret "range" to mean only "currently occupied" range to limit the biologically necessary but politically volatile expansion of such species as the wolf and grizzly bear. This latter day interpretation violates the restorative intent of the E.S.A. and the biological and ecological needs of the previously wide ranging species such as the Grizzly Bear.			Recovery	I wish for the record to show that I am AGAINST the delisting of grizzlies in the Greater Yellowstone Ecosystem. The extirpation of grizzlies and other large carnivores from an ecosystem is a global phenomenon with broad ecological consequences. Grizzlies and other carnivores benefit and shape our North American ecosystems. The Endangered Species Act calls for restoration of threatened and endangered species to a SIGNIFICANT portion of their HISTORIC range, The word "historic" doesn't appear in the law, but "historic" is logically and scientifically inseparable from "significant". When USFWS wrote its first implementing regulation for the E.S.A., it interpreted the law and congressional intent to require restoration to historic ranges. This interpretation remained in place for over thirty years until the Bush Administration ILLEGALLY tried to reinterpret "range" to mean only "currently occupied" range to limit the biologically necessary but politically volatile expansion of such species as the wolf and grizzly bear. This latter day interpretation violates the restorative intent of the E.S.A. and the biological and ecological needs of the previously wide ranging species such as the Grizzly Bear. The E.S.A. does not envision the restoration of endangered and threatened species to geographical "zoos", especially with such historically wide ranging species as the grizzly. It envisions restoration of species to their historic habitat, NOT CURRENTLY OCCUPIED HABITAT. Grizzlies didn't evolve in geographic zoos and until their extermination began in the 17th century, they were spread all over the West That means that their genetic diversity and long term survival depended upon, and depends upon now, adaptations to different environments and interchange with other populations throughout the West. The intent of the E.S.A. is to replicate, as much as possible, these evolved natural conditions of the species. In other words, we're talking about a species that has an evolutionary biology and ecology that depends upon its being in lots of places at low densities rather than having large populations in a few places which would create serious biological and ecological problems. Grizzlies, being at the top of the food chain, are necessarily limited in number in specific areas by food availability. In short, that means what is natural for grizzlies is low densities in specific areas but widespread distribution of interconnected populations throughout the continent....this is how genetic diversity is maintained.....You maintain genetic diversity by having small stable populations spread widely across the landscape with dispersers moving among populations. It's about density and distribution and interconnectedness, not numbers of bears. I urge you to allow grizzlies to seek out new areas so that the connectedness will continue to spread. This WILL NOT be achieved under state management and under hunting pressure. In summary...the E.S.A. requires grizzly restoration to the species historic range I ask you to take this into consideration and allow this dispersal to move forward without taking away the protections these bears need. If left to state management, this will not happen and once again grizzlies will persecuted and annihilated from our lands.	FWS-R6-ES-2016-0042-5190	
The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public.			Recovery	De-listing the Grizzly is a grievous error that threatens species diversity in the West: The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public. The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population. Research has also shown threshold population effects, which could mean that by the time the problem is detected, it is too late to fix the problem.	FWS-R6-ES-2016-0042-5203	

The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population. Research has also shown threshold population effects, which could mean that by the time the problem is detected, it is too late to fix the problem.			Recovery	De-listing the Grizzly is a grievous error that threatens species diversity in the West: The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. Long-term health of the population can be assured by maintaining a population of several thousand individuals. This requires expanding where bears can live in Yellowstone, recovering bears in the Selway-Bitterroot, and connecting grizzly bear ecosystems to source populations in Canada. The delisting plan relies on the importation of bears to address genetic problems. The plan requires the importation of two bears every ten years into the Greater Yellowstone Ecosystem (GYE) to address genetic problems. This is not natural recovery. Further, adding a bear or two is not likely to provide necessary gene flow, considering the low success of transplants in habitat that is already occupied. Again, the long-term health of the population can be achieved instead by expanding grizzly bear populations and connecting grizzly ecosystems. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public. The plan relies on adaptive management, with no specific thresholds to prompt changes if they are needed. The only specific threshold to prompt a review of the status of the population after delisting is a violation of mortality limits. The plan lacks thresholds and mechanisms to trigger change should habitat decline - which is happening now, and will continue. Scientists have demonstrated that lag-times exist between when habitat is lost and when this loss shows up as a decline in population. Research has also shown threshold population effects, which could mean that by the time the problem is detected, it is too late to fix the problem.	FWS-R6-ES-2016-0042-5203	
Specifically, the Endangered Species Act requires that, before delisting can occur, among other things, there are adequate regulatory mechanisms in place to ensure that the grizzly bear does not slip back towards extinction. These regulatory mechanisms are the responsibility of the states of Wyoming, Montana and Idaho and the appropriate federal land management agencies. However, the necessary management plans that provide these commitments have not been finalized and provided to us by the FWS for review with the proposal.			Recovery	Thank you for the opportunity to comment on potential Yellowstone Grizzly de-listing. Prairie Hills Audubon Society wants to be assured that the states and federal land management agencies, including the U.S. Forest Service, will manage bears and their habitat in a way that ensures a healthy and expanding grizzly bear population into the future. Prairie Hills Audubon Society is seriously concerned that the U.S. Fish and Wildlife Service (FWS) does not have all the required information and assurances finalized to make an informed decision. Specifically, the Endangered Species Act requires that, before delisting can occur, among other things, there are adequate regulatory mechanisms in place to ensure that the grizzly bear does not slip back towards extinction. These regulatory mechanisms are the responsibility of the states of Wyoming, Montana and Idaho and the appropriate federal land management agencies. However, the necessary management plans that provide these commitments have not been finalized and provided to us by the FWS for review with the proposal. Wyoming has yet to finalize a revised grizzly bear state management plan, and the recently completed draft is not consistent with statements made in the delisting proposal. It is unclear if, let alone when, Idaho or Montana will update their management plans. Until all three state grizzly bear management plans are revised and completed, it is impossible to assess if those management plans will provide bears with the adequate regulatory mechanisms that are required. With development increasing in the Northern Rockies region, public lands are critical for providing essential secure habitat for grizzly bears into the future. The agencies in charge of our public lands have an obligation to ensure that an iconic species like the grizzly bear can continue to thrive. However, the U.S. Forest Service has not revealed when it will amend the management plans of the six national forests surrounding Yellowstone to provide for adequate habitat protections for grizzly bears post-delisting or when this process would be available for public review. Prairie Hills Audubon Society encourages the FWS to continue to work with the state grizzly bear management agencies, tribal agencies and state and federal land management agencies that will be responsible for grizzly bears post delisting on: - Ensuring that robust protections remain in place for the Yellowstone grizzly bear core population including strict limits on mortality and strong habitat protections within the Primary Conservation Area (PCA), the area identified to remain the most protective for grizzly bears after delisting; - Giving Yellowstone grizzly bears the opportunity to continue to expand their range and reconnect with other grizzly bear populations to the north as well as allow for Yellowstone grizzly bears to expand into the Bitterroot Recovery Zone, currently absent of a grizzly bear population; - Expanding and strengthening habitat protections currently only allocated to the PCA into the larger Demographic Monitoring Area and further into areas identified as important to linkage between grizzly bear populations; - Continuing and strengthening programs that proactively minimize conflicts between bears and people thereby improving social tolerance and public acceptance for the bears throughout their range; and, - Working together to broaden partnerships and secure long term adequate funding for grizzly bear conservation and recovery into the future. In summary, Prairie Hills Audubon Society opposes the delisting of grizzly bears in the Yellowstone Ecosystem and request that the U.S. Fish and Wildlife Service withdraw the proposal until such time as all the required state and federal management plans and other documents that detail how this population of grizzly bears and their habitat will be managed post-delisting are finalized. ~~This is too important of a decision to make without a full understanding of how bears and their habitat will be managed once delisted.~~	FWS-R6-ES-2016-0042-5311	
I do not see anywhere that the FWS has proven that this bear is completely recovered from being endangered and in particular, the food supply upon which the grizzly bear must depend is slowly being devastated by the continued drought conditions in this ecosystem.			Recovery	I am against removing the Grizzly Bear in the Greater Yellowstone Ecosystem population from the Federal List of Endangered and Threatened Wildlife. I do not see anywhere that the FWS has proven that this bear is completely recovered from being endangered and in particular, the food supply upon which the grizzly bear must depend is slowly being devastated by the continued drought conditions in this ecosystem. The FWS is being pressured by ranchers and hunters who want to be able to kill these bears and eventually wipe out the entire population. This is a disgusting attack on an animal that has struggled to survive in the best of conditions. Please listen to the people who are not hunters, cattle ranchers, hunting guides who are just waiting to be able to kill a grizzly. Just like the cry to de-list the wolves, the constant din of these people to destroy endangered and threatened animals that have finally recovered in the lands they historically occupy. I have been to the meetings in which I can see the FWS, Game and Fish, and other entities give in to the pressure of these groups. Isn't the job of the "Fish and Wildlife" Service to preserve and protect our fish and our wildlife? If you remove the grizzly bear from protection, you have failed these animals and the people who want to see them protected. The money that has been spent on bringing these animals back from the brink of extinction will have been for nothing if you so casually remove them from protection. PLEASE RECONSIDER THIS TERRIBLE DECISION!	FWS-R6-ES-2016-0042-0535	
Their recent proposal to delist Greater Yellowstone Ecosystem (GYE) grizzly bears from the Endangered Species Act is far too premature and threatens the very existence of this population. There numbers are way too low, only around 700, and do not represent a healthy, recovered population that is large enough to be stable and able to withstand trophy hunting.			Recovery	Yet again, the U.S. Fish & Wildlife Service is making decisions for wildlife management that do not bode well for the actual recovery of the species they are supposed to be protecting. Their recent proposal to delist Greater Yellowstone Ecosystem (GYE) grizzly bears from the Endangered Species Act is far too premature and threatens the very existence of this population. There numbers are way too low, only around 700, and do not represent a healthy, recovered population that is large enough to be stable and able to withstand trophy hunting. If we lose grizzly bears in the Yellowstone area, we risk losing part of what makes the region so incredible. GYE grizzlies are the most famous in the world and draw in millions of tourists looking to spot the large, rare species. Not to mention the significant impact those tourist dollars have on the local communities and businesses. I'm asking you to support what the majority of Wyoming citizens want which is continued Federal protection of the Grizzlies!!	FWS-R6-ES-2016-0042-0541	

Please follow the existing law and de-list the Yellowstone Grizzly Bear as all requirements to do so have been met.			Recovery	Please follow the existing law and de-list the Yellowstone Grizzly Bear as all requirements to do so have been met. Also the current management of this animal is causing excessive danger to both bear and human alike. It has recovered and the greater population needs new management to ensure safety of the public and success of the bear.	FWS-R6-ES-2016-0042-0701	
Delisting the grizzly bears of the Greater Yellowstone Ecosystem can cause harm to the species. It has taken decades for the species to increase from a population of just over a hundred, to around 700. The increase in the number of grizzly bears may seem substantial, but it does not compare to the amount of grizzlies that roamed before they began to be hunted in the 1800s. The grizzly bears should remain on the Endangered Species List until their numbers increase to an amount that can be considered self-sustaining.			Recovery	Delisting the grizzly bears of the Greater Yellowstone Ecosystem can cause harm to the species. It has taken decades for the species to increase from a population of just over a hundred, to around 700. The increase in the number of grizzly bears may seem substantial, but it does not compare to the amount of grizzlies that roamed before they began to be hunted in the 1800s. The grizzly bears should remain on the Endangered Species List until their numbers increase to an amount that can be considered self-sustaining. Removing them from the list at this point would require significant monitoring and regulations that are already being implemented by the Endangered Species Act. The risks for the survival of the species increase when we consider that grizzlies are one of the slowest reproducing mammals. They typically do not reproduce until they are at least 4 or 5 years old. Grizzlies do not mate until the months between May and July. The female has to ensure that she gains enough weight during the summer so that the implantation of their eggs in the uterus occur between October and November. If she does not gain enough weight, the implantation may not occur. If the female is able to implant her eggs, then she will carry the cubs and give birth to an average of about 2-3 cubs. If hunting is made possible again there might be fewer grizzlies being born than the amount of number of grizzlies that are being killed. By removing the grizzly bears from the list, we would be removing a dominant species in the ecosystem. Other parts of their ecosystem will be harmed. Grizzlies are known to be omnivore, which signifies that a major removal of the grizzly population may alter many different types of plants, which could then harm other wildlife that are part of this ecosystem. If the grizzlies can be hunted outside of the national parks, we are placing the grizzlies that live outside of the parks in danger. States like Montana, Idaho, and Wyoming would have to manage their hunting regulations. The individuals in the states might ignore rules and regulations, and this might cause the population of grizzlies to decline rapidly. We would then be left where we initially were, adding the grizzly bear species to the Endangered Species List. Instead, the communities that surround the living areas of the grizzlies should be educated about the importance of keeping this species alive. They should be educated about techniques that they can use when they come across grizzly bears. Once an animal is placed on the endangered species list, even if the animal population recovers to a certain degree, hunting it should not be allowed again.	FWS-R6-ES-2016-0042-0784	
Thanks to the millions of dollars in funds contributed by hunters and anglers through the purchase of licenses grizzly bear recovery efforts in the Greater Yellowstone Ecosystem have been proven successful. This is a testament to how sportsmen are the driving force behind important wildlife programs. The Grizzly population in Yellowstone has reached all 3 criteria for delisting: at least 500 bears (reached in 2001), required distribution in 16 of 18 Recovery Bear Management Units (reached in 1999), and maintaining a population of 600-747 bears while maintaining mortality limits for independent females, males and dependent young.			Recovery	Let's proudly delist the grizzlies in Yellowstone! Thanks to the millions of dollars in funds contributed by hunters and anglers through the purchase of licenses grizzly bear recovery efforts in the Greater Yellowstone Ecosystem have been proven successful. This is a testament to how sportsmen are the driving force behind important wildlife programs. The Grizzly population in Yellowstone has reached all 3 criteria for delisting: at least 500 bears (reached in 2001), required distribution in 16 of 18 Recovery Bear Management Units (reached in 1999), and maintaining a population of 600-747 bears while maintaining mortality limits for independent females, males and dependent young.	FWS-R6-ES-2016-0042-0880	
I support the removal of the grizzly bear from the Federal Lists of Endangered and Threatened Wildlife. This is based on the fact that the grizzly population has reached all three criteria for delisting: at least 500 bears (reached in 2001), required distribution in 16 of 18 Recovery Bear Management Units (reached in 1999), and maintaining a population of 600-747 bears while maintaining mortality limits for independent females, males and dependent young.			Recovery	I support the removal of the grizzly bear from the Federal Lists of Endangered and Threatened Wildlife. This is based on the fact that the grizzly population has reached all three criteria for delisting: at least 500 bears (reached in 2001), required distribution in 16 of 18 Recovery Bear Management Units (reached in 1999), and maintaining a population of 600-747 bears while maintaining mortality limits for independent females, males and dependent young.	FWS-R6-ES-2016-0042-0819	
I believe that all of the criteria outlined for this de-listing to occur has been met, in fact it was met quite a few years ago			Recovery	I am providing public comment with regards to consideration of the de-listing of grizzly bears from the Federal List of Endangered and Threatened Wildlife. I STRONGLY favor this planned de-listing. I believe that all of the criteria outlined for this de-listing to occur has been met, in fact it was met quite a few years ago. I also believe it is critical that wildlife management remain a State's right as they have proven records in the past of fervently protecting both the wildlife and the wildlife's habitat. I have no faith that the federal government is in a position to do a better job than the state. Allowing the continued expansion of the grizzly in an un-checked and un-managed manner is quite likely to have serious un-intended consequences. Including, but not limited to over-population of the range, deprivation of other wildlife species, conflicts with ranchers, home-owners and car/bear traffic accidents. Please allow this de-listing and the subsequent management of the bear population by the individual states. Thank-you, Dale E. Myers	FWS-R6-ES-2016-0042-0952	
It's a proven fact that grizzly bears have recovered to a sustainable population in the Yellowstone area and have moved way beyond it's boundaries.			Recovery	As an outdoorsman, fisherman, hunter, conservationist and supporter of the Rocky Mountain Elk Foundation, I fully support the idea/decision to remove the greater Yellowstone ecosystem population of grizzly bears from the list of endangered and threatened wildlife. It's a proven fact that grizzly bears have recovered to a sustainable population in the Yellowstone area and have moved way beyond it's boundaries. Just this past September, I had a friend hunting in WY attached by a grizzly bear that had found his downed elk before he did. I've also heard countless stories of bears encountering hikers and fishermen in WY and Montana. I personally have no desire to hunt a grizzly bear and delisting them will have no direct impact on me. I support the idea and decision to remove them from the endangered list solely because I know wildlife managers and hunters can control the population and support the bears better than any federal government agency or anti-hunting organization. This is a fact.	FWS-R6-ES-2016-0042-0884	
How can we as Americans, have a successful North American conservation model if every animal we list stays listed. The Bears have more than recovered in the greater Yellowstone area, as stated by many respected biologist. The right thing to do is delist them and show that our conservation model works. If we let litigation continually hold up the right thing to do we all lose.			Recovery	How can we as Americans, have a successful North American conservation model if every animal we list stays listed. The Bears have more than recovered in the greater Yellowstone area, as stated by many respected biologist. The right thing to do is delist them and show that our conservation model works. If we let litigation continually hold up the right thing to do we all lose. Theodore Roosevelt would be ashamed of us for how we have mishandled this beautiful resource!	FWS-R6-ES-2016-0042-1022	

Their population has reached a highly sustainable level as evident by their expansion from the core area and they have been more than effective in reducing ungulate numbers to a point they are not overgrazing their range, even in lean years. As with any wildlife, to truly protect a species such as grizzly, nothing is more effective than establishing a hunting season and harvest quota.			Recovery	As a citizen who watches wildlife and human interaction, I wholeheartedly support removing the greater Yellowstone ecosystem population of grizzly bears from the list of Endangered and Threatened wildlife. Their population has reached a highly sustainable level as evident by their expansion from the core area and they have been more than effective in reducing ungulate numbers to a point they are not overgrazing their range, even in lean years. As with any wildlife, to truly protect a species such as grizzly, nothing is more effective than establishing a hunting season and harvest quota.	FWS-R6-ES-2016-0042-1086	
Removing the Grizzly Bear from the Federal Endangered Species classification is not only the proper thing to do but also what the Endangered Species Act was designed to do.			Recovery	Over the last hundred years wildlife has been supported and managed by scientific information. Numbers have been set and requirements made to insure the survival of every endangered species. Removing the Grizzly Bear from the Federal Endangered Species classification is not only the proper thing to do but also what the Endangered Species Act was designed to do. I know we will always have those "groups" that sit in the cities, watch TV, and contribute nothing to preserving any wildlife; that will protest any action no matter what scientific evidence says. States have managed such a wide section of wildlife for many years and they have done a wonderful job. Make it possible for this to continue.	FWS-R6-ES-2016-0042-1155	
I disagree with the notion of separating the Greater Yellowstone Population of bears from the other populations in the northern Rockies, and delisting only the GYE bear population. Grizzly recovery goals should be based on a larger ecosystem. Given the ecological disruptions that we know will occur on an increasing basis due to climate change, successful grizzly recovery will depend on connecting existing populations, and managing them as a whole.			Recovery	See Attached Attachments Weiner Gary	FWS-R6-ES-2016-0042-1229	
As a long time resident of the west, I want to see the bear continue to be on the ESL in the GYE. That is until their numbers there are around 1000 in that ecosystem.			Recovery	The grizzly bear is a key and unique species of north america. I have lived in Cook City, Silvergate, Gardiner and West Yellowstone (all in MT) over many years. I learned to love and respect the bear. I lived in WY for 30 years and now in ID for 7. I think the numbers are still low (700 out 300,000) and the intentions of many in WY, MT and ID in the Greater Yellowstone Ecosystem are to kill as many bears as possible as soon as they are off the Endangered Species List. I worked in YNP doing hiking and camping safety events teaching people how to be careful in bear country. Teaching about bear spray and helping communities get bear proof trash containers. I see this delisting the grizzly bear as a sad event. I remember when Frank and John Craighead warned the F&WS and the Park Service that changing to much all at once would cause great harm to the bear. Which is why they ended up on the ESL. I think the agencies are being pressured by politics and short sighted politicians. As a long time resident of the west, I want to see the bear continue to be on the ESL in the GYE. That is until their numbers there are around 1000 in that ecosystem. They need to have some DNA diversity. Also with global warming killing white bark pine, problems with yellowstone cutthroat trout numbers being devastated and moths not being as prolific (being killed off by pesticides) . I think it is reasonable and important to ensure the existence of this key species in the lower 48. I thank you for your time and attention.	FWS-R6-ES-2016-0042-1268	
It is also important to note that the Grizzly bear was unsuccessfully delisted in 2007 and returned only two years later to the Endangered Species Act because we failed to protect the species			Recovery	See Attached Attachments voconnor.yellowstoneletter	FWS-R6-ES-2016-0042-1306	
The grizzly is the slowest reproducing mammal in North America. To our knowledge there is no population number that has ever been proclaimed "safe" by any reputable study			Recovery	The grizzly is the slowest reproducing mammal in North America. To our knowledge there is no population number that has ever been proclaimed "safe" by any reputable study. The businesses and residents in grizzly territory have learned to peacefully co-exist. Bear-on-human incidents are extremely rare within fifty miles of Yellowstone Park. There is simply no reason to delist other than cattle operations which have been leasing government land for cents on the fair market value dollar do not want to give up their "cushy deal". These are national lands. While we have many friends in Wyoming and Montana, there are times when local interests must yield to national interests. This is one of those times. The grizzlies should be allowed to "naturally expand." This especially includes expansion of their range into the Big Horn Mountains. I have elected to submit these comments anonymously. I am apprehensive about retaliation. A Native American website has suggested that Mr. Servheen is integrally involved with a renowned trophy hunting organization.	FWS-R6-ES-2016-0042-1432	
- It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned.			Recovery	As a frequent visitor to the GYE, I oppose the delisting of Grizzly Bears on the following grounds: - The population/gene-pool is too small and disjointed. There is no genetic connectivity linkage at this time between Yellowstone bears (GYE) and those north (Northern Continental Divide), and they are not even connected by any viable corridor. - Grizzly bears are the slowest reproducing mammals in North America. A female bear will, at best, duplicate herself in a 10 year period. - Questionable science as to whether the "ecosystem is full" or if bears are moving out to find new food sources as their primary sources, (cutthroat trout and especially Whitebark Pine) diminish. - There are too many unknowns in climate/food source/habitat right now. - The applicable states have proven themselves to be incapable of, and even resistant to, managing a species of high importance to the non-hunting public and/or the federal government (example - Gray Wolves). - Even with Federal Protections, there have been way too many human caused illegal killings of Grizzly Bears and this will most certainly rise under state management only. - It is highly disputable whether the species has even met the USFWS's own recovery plan objectives - the population measures are currently being scrutinized and questioned.	FWS-R6-ES-2016-0042-1483	

Wy, Id, and Mt have 325K square miles of area and you call 5,000 square miles of habitat (62.5 of 1%) a successful recovery management?			Recovery	Please, do not delist Grizzly Bears. They have taken 40 years to increase their number by 600, or a mere 15 bears a year. The problems lies w/ in man's mismanagement of their food sources, White Bark Pine from climate change, the moronic illegal stocking of lake trout which feed on the brook trout which are a source of food for bears as they are shallow water fish compared to the deep water fish Lake trout are, and the use of pesticides which decimate the moth larva. In addition to this, mismanagement has relegated areas of habitat to remote islands making genetic diversity a problem. This is intentional as you advocate for more space for cattle knowing they cant stay in one locale year around...obviously, neither can wildlife. Your job description clearly states you are responsible for the welfare of the land, air, water, plant life including trees, and all animals that inhabit said land. It also states lethal use is the very last option. Because of your failure to manage in a sensible fashion, you wish to dispose of a species to cover up your error and your need for greed. Caving in to the political and special interest groups whims is further proof you are not managing wildlife in the interests of animal's welfare. I propose opening up corridors and buffer zones for all wildlife and delisting possible development areas for humans. There are some things money cant buy and our future generations have to have their safety of being able to sustain life insured. Read the Public Trust Doctrine sometime...its only been in the constitution for over 200 years! Bears, wolves, cougars, and other predators are essential to our very lives in numerous ways. Just for example, of the 5 major lethal diseases devastating 30% of the cervid herds in North America today, 4 of them are transmittable to humans and are just as lethal to humans as they are to cervids. Delisting bears or any other predator is a direct threat to the safety and lives of humans. Delisting means you support the spread of rabies, Hanta Virus, Rocky Mountain Spotted Fever, Chronic Wasting Disease, Epizootic Hemorrhaging Disease, Blue tongue Virus, Bubonic Plague (500 cases every year reported in Co and NM) Lymes Disease, Dry Rot Hoof Disease, and a host of other diseases to reign amok in human populations. Medical costs cost everyone, so you are also promoting economical terrorism. Regardless what you personally believe, something bigger than us put this whole design together. The complexity of it is fascinating and overwhelming how all living thing interact together in a connective fashion is something man cannot duplicate in his wildest imagination. Because you dont understand something is not a reason to hate it or want to kill it. Nature has an excellent record of managing itself. Our record sucks! Wy, Id, and Mt have 325K square miles of area and you call 5,000 square miles of habitat (62.5 of 1%) a successful recovery management? Let me clean out your bank account and give you 63 cents back and call that humane justice! Be real men...stand up and keep Bears and other predators listed and protected. Keep this planet alive and our future generations as well. Thank you for your time.	FWS-R6-ES-2016-0042-1602	
If these bears have reached their carrying capacity within the ecosystem and they no longer meet the criteria to be classified as endangered or threatened then why keep them on the list. Keeping them on the list in my mind is pointless if there is no need for them to be there.			Recovery	See attached file(s) Attachments Delist the Grizzly	FWS-R6-ES-2016-0042-1716	
A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. Â But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. Â The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. Â You claim: Your agency will stay involved with protecting the grizzly population after delisting. Â			Recovery	I most adamantly oppose your agency's proposal to strip Endangered Species Act protection from the Greater Yellowstone Ecosystem grizzly bear rebutting each of your claims for wanting to do so. You claim: There are more than 700 grizzlies in the Greater Yellowstone Ecosystem (GYE), and that's enough to delist them. The reality: No one really knows how many grizzlies are in the GYE. David Mattson, an ecologist who spent more than 20 years studying grizzly bears in and around Yellowstone, doubts the FWS numbers. "...what you'll hear from the [U.S.] Fish and Wildlife Service is that the population has tripled and even quadrupled in size, and I think that's a gross exaggeration." You claim: The shortage of cutthroat trout and whitebark pine nutstwo of the grizzly's primary foods is not a threat to the grizzly's long term survival. The reality: Not so, says Sylvia Fallon, Senior Scientist with the Natural Resources Defense Council. She told Montana on the Ground: "Yellowstone grizzly bears are an isolated population that is experiencing high levels of conflicts with people and is likely declining in the wake of the loss of whitebark pine, a critically important food source." The Center for Biological Diversity says that climate change and other factors have caused key grizzly bear food sources to collapse, and grizzly mortality rates have been increasing. The result is hungry bears roaming outside Yellowstone National Park more often. If those hungry grizzlies lose their legal protection, they could be shot the minute they step outside of Yellowstone. You claim: The Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. The Reality: Under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area. As reported by Montana on the Ground, "...groups such as WildEarth Guardians point out that the Yellowstone population of grizzly bears is no different from those in the Northern Continental Divide region or the Cabinet-Yakk region." Therefore, the grizzly bear cannot be delisted in just the GYE. Yellowstone Science magazine recently devoted an entire issue to the grizzly bear. A couple of the articles show that the population of the grizzly bear has not recovered enough to be delisted nationally either. In North America, grizzly bears once roamed from Northern Alaska south to Mexico and from the Great Plains west to the Pacific Coast. But by the 1930s, grizzly bears in the Lower 48 had been reduced to less than 2% of their historic range. Grizzlies now survive in only 4% of their historic range in the Lower 48. The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally. You claim: Your agency will stay involved with protecting the grizzly population after delisting. The reality: The Humane Society of the United States (HSUS) announced it would fight the FWS delisting and hand-over of management to Idaho, Montana, and Wyoming. HSUS said that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de-listing. THEREFORE I DEMAND YOU DO NOT DELIST THIS BEAR FROM BEING ENDANGERED.	FWS-R6-ES-2016-0042-1835	

The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public.			Recovery	The proposal to delist Yellowstone Grizzly Bears is irresponsible and will result in the decimation of our Country's iconic symbol of the West. For the following reasons below the proposal to delist must be abandoned: 1. The current population is too small and isolated to ensure long-term viability. The size of the current population is about one-quarter of what is needed to maintain genetic variability over time. 2. The delisting plan fails to consider the degree and the pace of habitat change occurring in the region, and their implications for bear recovery. Specifically, the plan fails to consider the effects of the rapid human population growth in the region, where some counties are doubling in size every ten years. The plan also underestimates the pace and implications of the loss of whitebark pine, an important bear food, due to mountain pine beetles, blister rust and global warming. In addition, cutthroat trout spawning in Yellowstone Park and bear use of trout, another key food, is declining as a result of ongoing drought and the effects of alien Lake trout. 3. The Wyoming plan will result in the decline of the grizzly bear population. Wyoming plans to manage the grizzly bear population down to 500 bears, which will result in an estimated killing of 50 bears annually. The population will decline after delisting, and cannot be sustained without life-support measures. 4. The delisting plan fails to address issues associated with high, ongoing human caused grizzly bear mortality. Most of the grizzly bears that die in the Greater Yellowstone Ecosystem die of human causes, and most are avoidable. While Yellowstone Park and some communities outside the park have gone to enormous measures to remove grizzly bear attractants, others have not. The problem of mortality of food-habituated bears will only get worse after delisting, when allowable mortality levels are raised, and resources for conflict resolution are reduced. Because problem grizzly bears are a human safety problem, it only makes sense to resolve the ongoing sanitation issues in the ecosystem before delisting. 5. The Fish and Wildlife Service fails to acknowledge that recovery targets have not been met. FWS has repeatedly stated that all the recovery plan targets for Yellowstone grizzly bears have been met. This is not true. In 2004, the agency violated the level of allowable female-caused mortality. Instead of acknowledging this fact, FWS changed the rules using a method that is only now being reviewed by the public. 6. The Fish and Wildlife Service wrongly assumes that delisting the grizzly bear will build social support and tolerance for grizzly bear recovery and the Endangered Species Act. The research cited does not support FWS's argument that people will be more supportive of grizzly bears if they are no longer federally protected. Successes in resolving conflicts typically occur because of the ESA, which forces parties to come to the table to solve problems, and provides needed resources. Please keep the Yellowstone Grizzlies protected! Do not delist them!	FWS-R6-ES-2016-0042-1912	
By continually moving the goal posts for what "recovery" is for a population and allowing anti-hunting interests to litigate away the biologists recommendations, we loose the power of the North American Model for Wildlife Conservation to protect population for future generations to experience.			Recovery	As a hunter, living in Massachusetts and quite removed from the GYE, I am writing in support of the de-listing of the Grizzly bear from the Endangered and Threatened Wildlife list. I strongly feel that once a population (of any specie) has reached and exceeded pre-determined objectives for recovery, the management of the recovered population should be turned over to the state. Historically, states' management of species through licensed hunting seasons has proven effective at protecting and bolstering populations. Revenue via licensing goes to protect these populations via habitat protection and law enforcement. By continually moving the goal posts for what "recovery" is for a population and allowing anti-hunting interests to litigate away the biologists recommendations, we loose the power of the North American Model for Wildlife Conservation to protect population for future generations to experience. Please stay true to the ESA and the North American Model and move to de-list the grizzly bear in the GYE.	FWS-R6-ES-2016-0042-2109	
According to latest estimates there are between 675 to 840 bears. According to USFWS coordinator Chris Servheen the population has recovered. In 2013 the highest number of females with cubs was recorded.			Recovery	I would like to voice my opinion on the delisting of the grizzly bear from the endangered species act. Facts show that is over due for the relisting. Yellowstone National Park's goal was to reach 500 which was met in 1999. According to latest estimates there are between 675 to 840 bears. According to USFWS coordinator Chris Servheen the population has recovered. In 2013 the highest number of females with cubs was recorded.	FWS-R6-ES-2016-0042-2475	
recovery population goal was 500 and was actually met in 1999			Recovery	I agree with the delisting of the Grizzly Bear and opening a hunting season on them. Please Reference: According to Yellowstone National Park, over the last 40 years the grizzly population there has grown from 136 to a stable population of somewhere between 674 and 839 The recovery population goal was 500 and was actually met in 1999. The grizzly bears in the Yellowstone area had been removed from the list in 2007 but in 2009 a 9th Circuit federal judge ordered that they be put back on, citing the decline of the whitebark pine tree, whose pine cone nuts were seen as a critical part of the grizzly diet. However, the Interagency Grizzly Bear Study Team found in 2013 that a lesser supply of whitebark pine cone nuts is not a significant factor because of the variety of foods grizzlies eat. The stable population also indicates that the whitebark pine decline has not reduced bear numbers. Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said that biological factors like distribution and reproduction also indicate the population is recovered.. Predictably, the Sierra Club and some other groups are opposing the delisting. Here are the objections listed by the Sierra Club in an August 2015 article. The growth rate of the Greater Yellowstone grizzly bear population has been flat since the early 2000s, and may be in decline. Fewer cubs and yearlings are surviving to adulthood. Fact: Chris Servheen, the grizzly bear recovery coordinator for the USFWS, said the reason the population is leveling out is that bear density has reached the carrying capacity for the range. Fact: the number of female grizzlies with cubs in the Yellowstone ecosystem was the highest ever recorded ever counted in 2013. Grizzly bears in the Yellowstone region are completely isolated from other grizzly bear populations, both geographically and demographically, as they have been for 100 years. Fact: Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000 - also likely to be proposed for delisting), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. Existing state management plans will not protect Yellowstone grizzly bears and will not allow them to connect to other grizzly populations if they are delisted now. Wyoming, Montana, and Idaho, the three states where Yellowstone grizzly bears live, plan to immediately initiate sport hunting of grizzly bears as soon as they are delisted. Fact: Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600. Courts have ruled that the U.S. Fish and Wildlife Service must consider the overall recovery of the species as it was originally listed under the Endangered Species Act, and may not delist isolated segments of the species (such as the Greater Yellowstone grizzly population) one at a time. Fact: This is a stalling tactic. Not all courts agree on any issue, especially since judge-shopping has become a common legal tactic, especially by activists. And, of course, not all areas see population recovery at the same rate. Opponents also say that the number of human-bear contacts must be reduced before the grizzly bear can be taken off the endangered list. But precautions are already in place and allowing the population to increase by preventing hunting would lead to more interactions, not fewer. Another opponent, The Greater Yellowstone Coalition, wants a delisting that has the bears managed as one population. OK. Idaho, Montana and Wyoming have written a joint plan for post-delisting management of grizzlies. The facts are on our side but facts can be overlooked by liberal judges. The grizzly experts in charge of the recovery are the ones proposing delisting.	FWS-R6-ES-2016-0042-2520	

As a hunter and wildlife photographer, retired conservation officer, and regional habitat manager for the South Dakota Department of Game Fish and Parks, I feel that available scientific data indicates that the Greater Yellowstone Ecosystem(GYE) population of grizzly bears (Ursus arctos horribilis) has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). The United States Fish and Wildlife Service (Service) has also proposed to identify the GYE grizzly bear population as a distinct population segment (DPS). Therefore, the Service proposes to revise the List of Endangered and Threatened Wildlife, under the authority of the Act, by removing the GYE population. The Service has determined that the GYE grizzly bear population has increased in size and more than tripled its occupied range since being listed as threatened under the Act in 1975 and that threats to the population are sufficiently minimized. Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000 - also likely to be proposed for delisting), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. Existing state management plans will protect Yellowstone grizzly bears and will allow them to connect to other grizzly populations if they are delisted now. Wyoming, Montana, and Idaho, the three states where Yellowstone grizzly bears live, plan to jointly manage Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting together if the number drops to 600. NGO's should be celebrating the delisting and not challenging because of the support from hunters, state and federal wildlife agencies for the work that they have done to restore this population. I fully support delisting this GYE population of grizzly bears. Great job USFWS!			Recovery	As a hunter and wildlife photographer, retired conservation officer, and regional habitat manager for the South Dakota Department of Game Fish and Parks, I feel that available scientific data indicates that the Greater Yellowstone Ecosystem (GYE) population of grizzly bears (Ursus arctos horribilis) has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). The United States Fish and Wildlife Service (Service) has also proposed to identify the GYE grizzly bear population as a distinct population segment (DPS). Therefore, the Service proposes to revise the List of Endangered and Threatened Wildlife, under the authority of the Act, by removing the GYE population. The Service has determined that the GYE grizzly bear population has increased in size and more than tripled its occupied range since being listed as threatened under the Act in 1975 and that threats to the population are sufficiently minimized. Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000 - also likely to be proposed for delisting), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. Existing state management plans will protect Yellowstone grizzly bears and will allow them to connect to other grizzly populations if they are delisted now. Wyoming, Montana, and Idaho, the three states where Yellowstone grizzly bears live, plan to jointly manage Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting together if the number drops to 600. NGO's should be celebrating the delisting and not challenging because of the support from hunters, state and federal wildlife agencies for the work that they have done to restore this population. I fully support delisting this GYE population of grizzly bears. Great job USFWS!	FWS-R6-ES-2016-0042-2637	
When will science prevail in this debate on whether or not to de-list the grizzly? The recovery goal was set at 500. The current population averaged between 2002-2014 is at 674! Sounds like they are recovered to me if we look strictly at numbers. Grizzlies also occupy 84% of suitable habitat in the GYE, and are expected to soon occupy the remainder. Sounds recovered to me! The number of female grizzlies with cubs was the highest ever recorded in the GYE in 2013. Once again, given the preceding information, they sound recovered to me!			Recovery	When will science prevail in this debate on whether or not to de-list the grizzly? The recovery goal was set at 500. The current population averaged between 2002-2014 is at 674! Sounds like they are recovered to me if we look strictly at numbers. Grizzlies also occupy 84% of suitable habitat in the GYE, and are expected to soon occupy the remainder. Sounds recovered to me! The number of female grizzlies with cubs was the highest ever recorded in the GYE in 2013. Once again, given the preceding information, they sound recovered to me! Again, when will we listen to those that have been given responsibility to recover this species and NOT the special interest groups that use the grizzly, the wolf, and now to a lesser (but increasing) extent, the sage grouse, to do their fundraising for them? It's not right, and should not be allowed to happen. Many people (most of whom probably don't even live near the GYE) are concerned that if de-listing is allowed to occur, that somehow State game agencies won't be able to manage the grizzly populations. This is not a valid fear. When has regulated hunting EVER reduced a population of animals to extinction...or even threatened status? Unregulated hunting, yes...regulating hunting, no! If anything, those that may be lucky enough to obtain one of the few permits that would be given out likely have high respect and regard for the grizzly. We prize and value those things in life that we are connected to. There is no greater connection to nature than to experience it first hand in a conservation NOT preservation-guided system. Please follow the science and de-list the grizzly bear. The GYE DPS is recovered beyond the original goals that were deemed sufficient to allow de-listing. What is the hold up??	FWS-R6-ES-2016-0042-2792	
There is no reason to say they have not recovered and no longer need protection especially when the population has exceeded the target 500 bear goal by almost double.			Recovery	I support delisting the grizzly bear. As a wildlife biology and management major, I understand the importance of carrying capacity in wildlife. It is important that we manage the bears rather than letting their numbers run loose so that the population doesn't increase too much. Therefore we should be able to determine a reasonable population of bears and hunt them to keep them there. The grizzlies are at the top of the food chain, besides humans, so they aren't going to be in danger from other animals. They are in danger from themselves because if there is too high of a population they will start depleting all of the resources. Hunting is not something that should be taken away from us, so we need to share the available prey with them. Having too many top predators would reduce our ability to hunt because there will be smaller populations of prey. To keep the prey, such as elk, at optimal population numbers you would reduce our right rather than reducing the amount of bears. I think this is wrong. Yes we should have predators, but we shouldn't allow them to over populate. Right now, my step father lives in Wapiti, Wyoming, which most people know is on the main route the the east entrance of Yellowstone. Wapiti is highly colonized by people, and grizzlies share that habitat too. In the past several years, grizzlies have become more and more of a problem with the people living here. There is numerous amounts of wilderness lands around Yellowstone that should allow the bears to live comfortably. When bears and humans start having conflicts in developed areas I think we have a problem. I'm not saying bears will never be around humans, but when they are causing problems and government agencies are constantly moving, trapping, or killing bears this should be a red flag. There is a grizzly bear recovery zone set aside just for them. The bears are now well past those boundaries and expanding quickly. There is no reason to say they have not recovered and no longer need protection especially when the population has exceeded the target 500 bear goal by almost double. I grew up hunting, fishing, and camping on horses in the wilderness of Shoshone National Forest, and I have been face to face with grizzly bears. Those who want to protect them should have to go into an elk camp in September in the Thorofare and stay there for the month. After that experience, then I will listen to what they have to say. Every outfitter knows the struggles of the grizzlies in their camps, around their horses, clients, and carcasses. Bear advocates want to group outfitters as bear haters, but if they lived in the outfitter's shoes for a year, they might think differently too. Not to say they are bear haters, it's just another problem to stack onto their extremely high daily load of duties. Simultaneously, every once in a while there is a habituated grizzly bear that causes a problem, charges, or endangers someone's life in the backcountry. These bears should not be given more than one chance, but with them protected it causes many problems with anyone who shoots one in self defense. When a person is in a life threatening situation, they shouldn't have to hope they will not get accused of shooting an endangered species purposefully and fear the consequences that come with it. If grizzlies were delisted, needing to shoot a bear would result in simpler actions. From the government side of the spectrum, my father is a law enforcement officer for the forest service where he spends most days riding a horse in the wilderness. He encounters bears just like the outfitters do and he sees first hand all of the problems. I also have worked for the forest service in backcountry trails for the past three summers and get to see grizzlies as well as their tracks on the trail everyday. The most I have seen in one day is 18 bears. Don't you think that's a lot for a 12 mile stretch? If you do not encounter bears first hand then you do not understand the implications. Another argument once brought up is the availability of the white bark pine. It has been determined	FWS-R6-ES-2016-0042-3160	

ou may recall that 10 years ago the George W. Bush administration decided to delist the grizzly bear in the Greater Yellowstone Ecosystem, thus removing protections provided by the Endangered Species Act. Environmentalists, wildlife lovers and animal protection groups sprung into action. After thousands of Americans submitted comments protesting the delisting, the courts ruled in our favor and the proposal was abandoned. An Op Ed I wrote in 2006 for the San Francisco Chronicle as the Sierra Club national president offered a list of compelling reasons for why grizzlies needed to remain protected under the ESA. x Fast forward 10 years. The U.S Fish and Wildlife Service has once again proposed to delist the Yellowstone grizzly! It's still a terrible idea for all of the same reasons...climate change, food scarcity, genetic isolation, threats of trophy hunters, and loss of habitat due to development and other human activities. A			Recovery	I wanted to alert you to a devastating development that threatens one of America's great wildlife icons--the grizzly bear of Yellowstone. Without our help, these magnificent animals, which used to roam throughout much of the West (including California and now remain only on our state flag) could be subject to trophy hunting within a few months! You may recall that 10 years ago the George W. Bush administration decided to delist the grizzly bear in the Greater Yellowstone Ecosystem, thus removing protections provided by the Endangered Species Act. Environmentalists, wildlife lovers and animal protection groups sprung into action. After thousands of Americans submitted comments protesting the delisting, the courts ruled in our favor and the proposal was abandoned. An Op Ed I wrote in 2006 for the San Francisco Chronicle as the Sierra Club national president offered a list of compelling reasons for why grizzlies needed to remain protected under the ESA. Fast forward 10 years. The U.S Fish and Wildlife Service has once again proposed to delist the Yellowstone grizzly! It's still a terrible idea for all of the same reasons...climate change, food scarcity, genetic isolation, threats of trophy hunters, and loss of habitat due to development and other human activities. We believe grizzlies should remain protected under the ESA!	FWS-R6-ES-2016-0042-3201	
IT IS UNJUSTIFIED TO DELIST THE GRIZZLIES because they are not recovered. While USFWS claims that there are 700 grizzly bears in the Greater Yellowstone Ecosystem, this is a contested figure. Grizzly bears have not recovered across a significant portion of their range and should not be delisted.			Recovery	This comment is in honor of Bear #399, Queen of the Tetons- I strongly oppose removing the Greater Yellowstone Grizzly bears from the protections afforded under the Endangered Species Act! That such a notion is even being contemplated is shocking. According to the best scientific evidence available, any plan to delist the Grizzlies is unjustified, reckless, and unconscionable. IT IS UNJUSTIFIED TO DELIST THE GRIZZLIES because they are not recovered. While USFWS claims that there are 700 grizzly bears in the Greater Yellowstone Ecosystem, this is a contested figure. Grizzly bears have not recovered across a significant portion of their range and should not be delisted. IT IS RECKLESS TO DELIST THE GRIZZLIES because their survival is precarious, at best, due to continued habitat encroachment, loss of key foods, increased mortality rates and low rate of reproduction. IT IS UNCONSCIONABLE TO DELIST THE GRIZZLIES because lifting the federal protections will allow state-sponsored trophy hunting. USFWS, as Guardians of the Greater Yellowstone Grizzlies, you have a fiduciary responsibility to protect these bears. Please do not betray that trust by delisting them from the Endangered Species Act.	FWS-R6-ES-2016-0042-5441	
FWS has exclusive monopoly on raw data on YGB, data that is owned by taxpayers that FWS refuses to release. Without free and unhindered access to data how can the public possibly trust FWS with our bears? In its haste to delist FWS conspicuous omissions look to be for the sole purpose of supporting its agenda to give bear management to the states where a trophy hunt aka a discretionary mortality is already for sale. \$150 per head is Americas return on investment. FWS is entirely overly optimistic when monopolizing the publics data by making unproven assertions of secure environment for YGB while dismissing impact of highly dynamic factors ie Anthropogenic Climate Change (ACC) therefore we conclude that the effects of climate change do not constitute a threat to the GYE Grizzly Bear now, nor is it anticipated to in the future declaring that ACC effects may even make habitat more suitable and food sources more abundant (Servheen 2010 p4) so FWS is endorsing ACC now, great just what we need more catastrophic ACC for YGB even as ample evidence of ACC is sighted in the Rule (13216-13217). Schizophrenic, FWS still says no problem YGB are adaptable yet with no supporting evidence provided. YGB requires seasonally reliable highly nutritional foods to sustain itself which FWS does not identify. The YGB is evolutionarily unique and isolated pop with distinct ancient ties to a Yellowstone now in the midst of deteriorating environmental conditions from ACC, excessive unsustainable human caused mortality, declining foods evidenced in terminal White Bark Pine seed, fragmented pops from impaired habitat, long term deleterious trends to carrying capacity and victims of FWS overestimates that contain no scientific accountability, inaccurate misleading pop estimates, no connectivity to NCDE effecting long term genetic viability species. Pop dynamics is a body of solidly grounded dynamical systems theory with governing principles of best science which FWS dismisses out of hand. FWS says pop numbers are high enough to delist w/o citing pop critical aspects pertinent to delisting ie reproductive delays eroding YGB pop dynamics. Pop growth= Births--Deaths. Very damaging pared with loss of critical foods = sudden and dramatic collapse. This is particularly true since the ingredients for complex dynamics are so prevalent and obvious in YGB. If FWS wants publicity for its delisting proposal well they're certainly going to get it. FWS has no science based conclusions instead its conclusions are backwards march away from ACC & White Bark Pine Seed (WBPS). How could FWS confuse WBP trees with WBP seeds in the Rule? YGB does not eat trees they eat seeds! This was the YGB most sustainable nutritional food that is now endangered itself if not terminal. FWS has completely bungled then conflated data so horribly then proceeds to cover			Recovery	See attached file(s) Attachments Comment on Grizzly Bear Delisting 5.10.16	FWS-R6-ES-2016-0042-3434	

Delisting the Grizzly bear from Endangered species status is a bad idea. My understanding is that there has been a 6-10% multi-causal mortality of the Yellowstone population of Grizzly Bears during 2015. This level of mortality is not sustainable and hardly indicates a recovered population. Common sense would dictate that this trend needs to be followed for several years before management is turned over to three states that are hostile to co-existence with large carnivores.			Recovery	Delisting the Grizzly bear from Endangered species status is a bad idea. My understanding is that there has been a 6-10% multi-causal mortality of the Yellowstone population of Grizzly Bears during 2015. This level of mortality is not sustainable and hardly indicates a recovered population. Common sense would dictate that this trend needs to be followed for several years before management is turned over to three states that are hostile to co-existence with large carnivores. A Reliable source, (Mattson, 2016) states that "dramatic increases in grizzly bear activity on moth sites have also contributed to inflated estimates of growth for the Yellowstone grizzly bear population. Bears on moth sites are almost certain to be seen by airborne researchers and managers out looking for females with cubs-of-the-year." Endangered species status seemed to result in a dramatic recovery of the population over the past three decades. (until 2015) There will be inconsistent management of the Grizzly as a nuisance or as a potential trophy by Idaho, Montana and Wyoming. This will put the population at great risk. Hunters will claim that they had to shoot a bear in self-defense. Bears habituated to large metal objects (cameras) in Yellowstone NP will be treated very differently when confronted by large metal objects (rifles) outside of Yellowstone. How did the USFWS account for climate change in making this decision? Three of the Grizzly Bear's main food sources (pine nuts, elk, and cutthroat trout) are in decline. As someone who has spent much time observing and photographing bears in the wild, the magnificent Grizzly is a symbol of the wildness that remains in the American West. The Grizzly is a source of inspiration and is worshipped by many Americans. Those interested in sport hunting can travel to Alaska where the Alaskan Grizzly and Brown Bear are not endangered and have a stable food source. Would the USFWS please disclose the special interests that have been involved in their recommended delisting decision. I urge the USFWS to make a decision regarding the Grizzly Bear that is science based and not driven by political interests. Please expand the Primary Conservation Area for the Yellowstone Grizzly to include all of the known moth sites, and then protect these sites and a substantial surrounding area from any sport hunting. Better yet, please continue ESA for the Yellowstone Grizzly Howie Garber MD	FWS-R6-ES-2016-0042-3453	
**The size and distribution of the current population of grizzly bears does not ensure long-term viability--science indicates that a population of several thousand, AS WELL AS connecting grizzly ecosystems [e.g. to source populations in Canada] is required to achieve this goal.			Recovery	I STRONGLY OPPOSE YELLOWSTONE GRIZZLY BEAR DELISTING. **The size and distribution of the current population of grizzly bears does not ensure long-term viability--science indicates that a population of several thousand, AS WELL AS connecting grizzly ecosystems [e.g. to source populations in Canada] is required to achieve this goal. NOTE THAT THE LOSS OF ONLY A FEW FEMALE BEARS EACH YEAR CAN MEAN THE DIFFERENCE BETWEEN A STABLE OR DECLINING POPULATION. Studies show that it typically takes a female grizzly TEN (10) years to have a female cub that survives to give birth. **The degree and pace of habitat change occurring in the region MUST BE [AND IS NOT YET] INCORPORATED--human population is rapidly expanding; whitebark pine [a very important food source for grizzlies] is disappearing at an alarming rate due to mountain pine beetle infestation, blister rust and other diseases, and the effect of global warming in this ecosystem. THEREFORE, the Agency must protect unoccupied habitat outside of the recovery zone, including areas where bears have been prohibited. **Delisting necessitates habitat management plans WHICH DO NOT AS YET EXIST. Positive results can only be achieved if states fulfill their commitment to species recovery [when grizzlies are finally declared recovered and states assume primary responsibility for management of the species]. Certainly, WOLF RECOVERY MANAGEMENT in WY following delisting in the Northern Rockies in 2011, DOES NOT BODE WELL for the grizzlies: WY classified wolves as PREDATORS, permitting anyone to kill them, by any means, any DAY OF THE YEAR, for any reason, across 85 percent of the State. **The delisting plan CONTAINS NO HABITAT PROTECTIONS FOR ABOUT 1/3 OF OCCUPIED GRIZZLY HABITAT. To sustain current population numbers, habitat conditions must also be maintained. The current PLAN ONLY PROTECTS LANDS WITHIN THE SIX MILLION ACRE RECOVERY ZONE, AND LEAVES OUT OVER TWO MILLION HABITAT ACRES, all of which except 15% protected as Wilderness IS OPEN TO DEVELOPMENT. ONE FINAL POINT [though not SCIENTIFIC, it is based on reliable data from numerous studies]: **More and more nature-loving Americans BELIEVE THAT SPECIES LIKE GRIZZLIES and wolves should be part of the landscape. Unlike in the "frontier days," when predators were ONLY VIEWED as liabilities, there is growing sentiment that uncommon species like grizzlies are WORTH MORE ALIVE THAN DEAD. A large part of the Greater Yellowstone Ecosystem's \$1 BILLION tourism industry is based on wildlife viewing.	FWS-R6-ES-2016-0042-3509	
FWS claims there is a large and healthy population of bears but scientists and even the former NPS superintendent of Yellowstone have questioned the studies numbers and methodology. FWS is also claiming bears are not suffering adversely from the loss of 2 major food sources, the cutthroat trout and whitebark pine. It is too early to be sure what long term affect this will have on the bears but 2015 was a record year for Grizzlies killed around Yellowstone and as bears are forced out of the national park in search of food they will be left vulnerable to being shot without protections imparted by the endangered species act. Delisting the grizzly bears could result in decades of recovery work being lost in a few short years under state management which will allow trophy hunting, according to a memo between the states widely circulated in the media.			Recovery	I am opposed to the delisting of the Yellowstone grizzly bear. As a long time resident and guide in Yellowstone National Park I have serious concerns about the future of the grizzly bear and the sustainability of their population. FWS claims there is a large and healthy population of bears but scientists and even the former NPS superintendent of Yellowstone have questioned the studies numbers and methodology. FWS is also claiming bears are not suffering adversely from the loss of 2 major food sources, the cutthroat trout and whitebark pine. It is too early to be sure what long term affect this will have on the bears but 2015 was a record year for Grizzlies killed around Yellowstone and as bears are forced out of the national park in search of food they will be left vulnerable to being shot without protections imparted by the endangered species act. Delisting the grizzly bears could result in decades of recovery work being lost in a few short years under state management which will allow trophy hunting, according to a memo between the states widely circulated in the media. As a guide in Yellowstone park, I rely on wildlife being visible for my clients. Delisting the grizzly is bad for bears, bad for business and wrong for Yellowstone.	FWS-R6-ES-2016-0042-3544	
Their population is not even fully recovered, they are struggling with loss of food due to climate change. They reproduce so slowly this will devastate their not yet fully recovered population. The ESA was not designed to have animals taken off and immediately hunted! Trophy hunted... Only 33% of hunters even want this and we should not be catering to them, but rather look at the numbers, understand the grave impact and do not delist them.			Recovery	I do not believe grizzly bears should be taken off of the endangered species list. Their population is not even fully recovered, they are struggling with loss of food due to climate change. They reproduce so slowly this will devastate their not yet fully recovered population. The ESA was not designed to have animals taken off and immediately hunted! Trophy hunted... Only 33% of hunters even want this and we should not be catering to them, but rather look at the numbers, understand the grave impact and do not delist them. Thank you.	FWS-R6-ES-2016-0042-3935	

I support delisting of the Grizzly. Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. If hunting the Grizzly is allowed, Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600.			Recovery	I support delisting of the Grizzly. Grizzlies in the Lower 48, of which the Yellowstone population is the second largest (next to the Northern Continental Divide Ecosystem in Montana at 1,000), have more than doubled their range to 22,500 square miles, an area larger than the states of New Hampshire, Massachusetts and Rhode Island combined. Grizzlies again roam from the Tetons south of Yellowstone up through northwestern Montana and a good part of Idaho, to the Canadian border. If hunting the Grizzly is allowed, Idaho, Montana and Wyoming have a joint plan adjusting hunting if the population falls below 675 and will halt hunting altogether if the number drops to 600.	FWS-R6-ES-2016-0042-3939	
The FWS claim that the Greater Yellowstone Ecosystem (GYE) grizzly has recovered enough range to be delisted. Grizzly Bears are not recovered enough to warrant a devising (especially considering the imminent threats waiting for such a move). Further, under the Endangered Species Act, species must be treated as a whole unless FWS can prove that the animals in one area are biologically different than the animals in another area.			Recovery	Please see attached comment. Attachments Letter to the FWS on De-lisiting the Grizzly	FWS-R6-ES-2016-0042-3929	
Chris Servheen, the federal coordinator for grizzly bear recovery, is mostly interested in his own career, and delisting is mainly a political and personal objective for him. He is arrogant and selfish and should have been fired long ago.			Recovery	Hello and thank you for this opportunity to comment on the proposed delisting of the Yellowstone grizzly bear population. I oppose this proposal for many reasons. My comments are dedicated to the memory of Scarface, a magnificent male grizzly who was about 25 years old and was shot and left for dead last fall outside of Jardine, Montana. I have some great memories of watching him - he was a smart and wiley old bear who caused no problems for people, but still got shot. Chris Servheen, the federal coordinator for grizzly bear recovery, is mostly interested in his own career, and delisting is mainly a political and personal objective for him. He is arrogant and selfish and should have been fired long ago. While there is no doubt that grizzlies have come a long way in the Yellowstone area since 1972 when there were maybe 130 left, they have a long way to go. Recovery is in serious jeopardy with at least 70 bears killed last year. Numbers have flatlined and reproduction is probably declining. The population is aging. The Yellowstone ecosystem is under heavy pressure from human population and development, with more wild habitat developed every day. While the heyday of logging and road building has passed, recreational development and activity has skyrocketed. Grizzly habitat is getting crunched. Subdivisions are sprouting up everywhere. I live in Bozeman, where everything is former grizzly habitat (my house included), and the pace of development is mind blowing. Meanwhile grizzlies are losing some of their major food sources - whitebark pine, cutthroat trout, army cutworm moths. This is forcing them to seek more protein (elk, deer, livestock), which humans also want, bringing the bears into more conflict with ranchers and hunters, and bringing the bears into forests and ranchlands (where there are more people) instead of staying in the high country. Not to mention that hundreds of bison are removed from the ecosystem nearly every year due to paranoia about brucellosis. How many grizzlies could those bison feed? Nor can grizzlies safely or effectively reach other populations of grizzlies to the north, meaning the Yellowstone grizzlies are totally isolated. Thus they cannot interbreed with other populations nor supplement their numbers from outside the ecosystem. One can hardly call this recovery. Instead we should be reintroducing grizzlies to the extensive public wildlands of Central Idaho. Delisting will mean turning management over to the states of Montana, Wyoming and Idaho, all of whom are drooling over the chance to hunt grizzlies. This makes me sick. So we spend all this time and effort to recover the grizzly, just so some rednecks can turn them into trophies? Is that the best we can do? I work as a guide and naturalist in Yellowstone Park. The biggest thing my guests want to see is bears and wolves, especially grizzly bears. People pay a lot of money to come here with the hope of seeing these animals. They get to enjoy them and leave them for others to do the same. Hunting predators like grizzlies is selfish and greedy, and is a one-time use. What it really comes down to is respect for other lives than our own. Can we be wise enough and tolerant enough to let the great bear exist on its own merit? Or must we take away the protection they need so we can pretend we have saved them? Attachments DSC07180	FWS-R6-ES-2016-0042-4434	
The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. Å **The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). Å			Recovery	I am opposed to the delisting of grizzly bears. A few of the reasons but not even close to all of the reasons are as follows: **The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. **The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. **The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). There is no reason to trophy hunt - it serves the interest of a tiny portion of the population who want to make rugs from these iconic species that are part of our American heritage. **USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. **What's the Rush? There are too many unknowns right now, regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population. Why not wait five years to see how the population is responding to these threats?	FWS-R6-ES-2016-0042-4569	

USFWS's proposal x does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. Å			Recovery	I am opposed to the delisting of grizzly bears. A few of the reasons but not even close to all of the reasons are as follows: **The USFWS's proposal does not adequately protect habitat outside the Primary Conservation Area, even though perhaps as many as half of the ecosystem's grizzlies spend some time outside the Primary Conservation Area. The USFWS should call for continued protections of habitat for EVERYWHERE grizzlies currently live, even if outside the PCA. **The USFWS's proposal does not adequately address the problem of genetic isolation by improperly relying on non-binding "assurances" from the state of Montana to "limit mortality" in potential linkage zones. The USFWS needs to do more to ensure that GYE grizzlies are able to exchange genetics with grizzly populations to the north, which is an absolute necessity if grizzlies are to survive in the longterm. **The USFWS's proposal improperly accepts a Wyoming management plan that effectively excludes grizzlies from large swaths of suitable habitat in the ecosystem, such as the Wyoming Range and southern Wind River Range that could serve as important refuge as the bears' food sources in the heart of the ecosystem continue to dry out. In it's draft conservation strategy, the USFWS has declared these areas as "socially unacceptable" but over 2/3 of Wyoming residents supported grizzly bear range expansion into the Wyoming Range and Wind River Range (not to mention the Bighorn Range. ("Public Attitudes Toward Grizzly Bear Management" by Wyoming Game and Fish Department - 2001). There is no reason to trophy hunt - it serves the interest of a tiny portion of the population who want to make rugs from these iconic species that are part of our American heritage. **USFWS's proposal does not adequately address the far-reaching and wide-ranging impacts of climate change on the future survival of GYE's grizzlies. These impacts will include: the continued devastation of the whitebark pine stands and potential impacts on denning habitat. **What's the Rush? There are too many unknowns right now, regarding the bear's food sources, impacts of climate change, and increased mortality/decreased population. Why not wait five years to see how the population is responding to these threats?	FWS-R6-E5-2016-0042-4569	
There is not strong evidence that the Yellowstone grizzly has recovered. The U.S. Fish and Wildlife Service claims that the bears are recovered because they are dispersing out of Yellowstone National Park and the primary conversation area.			Recovery	May 9, 2016 The Portneuf Valley Audubon Society is opposed to delisting the Yellowstone grizzly from the Federal List of Endangered and Threatened Wildlife for the following reasons: 1.) We do not trust the states to do a good job. Wyoming has done so badly with wolves that a federal judge took management away from them. Idaho Fish and Game sneaked a hunter into the Frank Church-River of No Return Wilderness to kill wolves because they felt the wolves were taking too many elk in the Chambelain Basin. This was done without public knowledge or input. The state fish and game agencies are under constant pressure to kill predators from state politicians who oppose their protection and wish to see them eradicated. Grizzlies, and largest and most charismatic of western omnivores, would certainly be no exception. 2.) There is not strong evidence that the Yellowstone grizzly has recovered. The U.S. Fish and Wildlife Service claims that the bears are recovered because they are dispersing out of Yellowstone National Park and the primary conversation area. However, they could well be moving out of the area because of lack of food. Their primary protein source, the cutthroat trout, is gone from Yellowstone Lake and related spawning streams because of the lake trout. Other food sources like the whitebark pine nut stands are also failing. Stand that are still viable are outside of the park and in areas where the grizzlies would be hunted and killed. Since 2003 there have been approximately 700 grizzlies reported in the Greater Yellowstone Ecosystem. Numbers for 2015 are 717. These numbers do not suggest recovery but simply the same number of bears over 12 years, give or take, and these bears are dispersing. If they were leaving because of increased population, not lack of food, we would expect to see an increase in the number of bears. This has not happened. 3.) Finally, we believe the wish on the part of U.S. Fish and Wildlife Services to delist the Yellowstone grizzly could well be due to politics, not science. It is well known that the current director, Dan Ashe, is no friend of endangered and threatened species. He has been hostile to wolf recovery, listing the obviously threatened sage grouse, and is willing to allow wind farms' collateral kill of bald eagles to increase from 1000 to 4000 annually. For these reasons we oppose delisting the Yellowstone grizzly. It is obvious the bears are a favorite with the public and we fear, with good reason, that the states of Wyoming and Idaho will do their best to kill them once federal protection is removed. Jackie Johnson Mauaghan, treasurer	FWS-R6-E5-2016-0042-4648	
I want to express my severe disappointment that a public hearing was not held in Jackson, WY, as this city is in the heart of the DMA. It would appear that FWS deliberately chose NOT to hold a hearing at this location when it is surrounded by grizzly country, many of the residents rely on the Yellowstone grizzlies for economic means from tourism, and residents have vested interest in the issue of delisting. The public comment period of 60 days is inadequate for a comprehensive public response, especially since the state management plans for Idaho and Montana have not been released. This transparency issue does not give the public a chance to be informed to the fullest extent possible. Citizens CANNOT make informed decisions based on partial information. FWS is proposing delisting, but when the public is asked to comment without the full knowledge of state management plans å€œ essentially the fate of the grizzlies- suggests political motivations for delisting instead of sound, scientific reasoning. Release of the ID and MT state management plans, adequate time to comment on those drafts, and an extension of the public comment period for the FWS proposal beyond those comment periods of the ID and MT management plans is essential for a fair and informed commenting process.			Recovery	Please see attachment. Attachments FWS comment	FWS-R6-E5-2016-0042-4891	

I am concerned that FWS is using 1998 as a baseline, as this is before the WBP epidemic. Grizzly numbers may have been rising and the ecosystem able to support a growing population in 1998, however the GYE now has many stressors that were not as prevalent as in 1998. Climate change, blister rust, and pine beetles have decimated WBP populations. In the previous proposal of the 2007 delisting of grizzlies, WBP was stated as one of four important food sources. FWS lost its appeal in the Ninth Circuit Court in 2011 because the Service was found to be arbitrary and capricious in its consideration of grizzlies' use of WBP. In the current proposal, FWS merely claims WBP to be an important food source, and the research used to support this claim is not comprehensive in consideration to climate change and epidemics, making the argument once again arbitrary and capricious. The current rule glosses over and deemphasizes the role WBP has in a GYE grizzly's diet to serve as a base for delisting. The Service's research found grizzly bears' selection of WBP seeds has declined since 2000, coinciding with WBP population declines reaching epidemic proportions, but the agency fails to acknowledge the likely causal connection of stark and rapid declines of WBP populations being a limiting factor for grizzly bears using it as a food source. The proposal states one-third of grizzly bears do not have WBP in their home range, but does not elaborate to clarify if a lack of WBP is because WBP does not grow in those regions or if those populations have been decimated by beetles and blister rust, therefore removing that vital food source from the bear's diet. The studies conducted are vastly insufficient in duration to determine the effects of climate change, reduced viable habitat, dwindling food sources, and how these stressors affect grizzly populations. The FWS is hasty, unreasonable, and offers dubious scientific results as evidence in favor of delisting. The Service is also relying on the ability to declare an emergency to delist grizzlies if need be. More stability in habitat, food sources, and reproduction is necessary before delisting can occur, otherwise the emergency delisting will be swift and the population will suffer great losses. I cannot, and will not, support delisting when the effects of climate change, diminishing food sources, habitat viability, and a lack of transparency in regards to state plans leaves so much to speculation.			Recovery	Please see attachment. Attachments FWS comment	FWS-R6-ES-2016-0042-4891	
I absolutely disagree with the USFWS's totally premature and significantly and inadequately designed and planned proposal to delist the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Threatened Species Protections of the Endangered Species Act which the grizzly bears have been under for the last 40 years for these several important reasons.			Recovery	As a wildlife biologist, I have worked with several USFWS Threatened and Endangered Species over the past 30 years, with several federal land management agencies. I absolutely disagree with the USFWS's totally premature and significantly and inadequately designed and planned proposal to delist the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Threatened Species Protections of the Endangered Species Act which the grizzly bears have been under for the last 40 years for these several important reasons. 1. While the numbers of grizzly bears in GYE are up since the low in the late 1970s and early 1980s, this has taken more than three decades of significant and serious legally established protections and considerable conservation efforts on many different levels. The delisting of GYE grizzly bears now, during increasing Climate Change uncertainty and scientifically accepted understanding of changing or reduced grizzly bear habitats including food, water and shelter resources would absolutely reduce the GYE grizzly bear population (likely other lower 48 grizzly bears and their populations too), and their conservation efforts and funding, which would definitely and significantly compromise the viability of these GYE grizzly bears in both the short-term, and the long-term for America's Future generations. All the important and comprehensive grizzly bear conservation measures must be established and in place before delisting proposal is considered, including all the funding, ecological, scientific, social, and economic issues and concerns. Unfortunately, none of these important conservation measures, issues, and concerns are adequately addressed yet, so this grizzly delisting proposal must not continue. 2. Unfortunately, after delisting, the likely legal hunting of grizzly bears in the states of ID, MT, and WY, would NOT be responsible or reasonable for the GYE grizzly bear population to continue to be healthy and viable. Also, unfortunately, the illegal killing of grizzly bears would significantly rise, especially with little or no funding, efforts or motivation to prosecute violations of important wildlife regulations. I am absolutely against any legal hunting of grizzly bears in the lower 48 contiguous United States for many responsible reasons, and especially for the hunting of grizzly bears would definitely be damaging to grizzly bear conservation and the GYE grizzly bear population would be significantly reduced. Any consideration or allowance of legal grizzly bear hunting in any state at anytime in the future must absolutely be denied before proposal is reasonable, responsible, or expectable. 3. Absolutely, important comprehensive Grizzly Bear Habitats on federal, state and local lands in all the appropriate NW States must be established and well coordinated first, before any delisting proposal should be considered. Seriously, grizzly bear habitats and their continued management, preservation and conservation for grizzly bears in the states of ID, MT, and WY on federally managed public lands and national forests have NOT been well coordinated, adequate, legally binding, or secured before this delisting proposal was made. Therefore, this proposal should be stopped immediately. 4. The Endangered Species Act requires tribal nations consultation and cooperation which the USFWS has NOT properly handled, managed, or considered. 5. To establish the GYE grizzly bear population as a distinct population segment is definitely and absolutely the most scientifically, ecologically, and socially irresponsible way to continue conservation and protection of a healthy functioning viable grizzly bear population in the GYE or any of the other grizzly recovery areas either. Comprehensively protecting, conserving, reconstructing reestablishing, and reconnecting important, effective, healthy, functioning grizzly bear, predator and wildlife habitat corridors for their dispersal, migration, safe passage and a healthy viable future is most prudent and necessary for long-term conservation. The fact that the USFWS is proposing this DPS and	FWS-R6-ES-2016-0042-5460	
The delisting proposal is based on recovery goals for the GYE population that do not consider the necessary reconnection of the GYE population with the NCDE population to the north. Without establishing this connection before delisting, critical opportunities to ensure the long-term genetic health of the species will be lost.			Recovery	I am writing to strongly oppose the delisting of the Greater Yellowstone Ecosystem population of grizzly bear (<i>Ursus arctos horribilis</i>) under the Endangered Species Act (ESA). The delisting proposal is based on recovery goals for the GYE population that do not consider the necessary reconnection of the GYE population with the NCDE population to the north. Without establishing this connection before delisting, critical opportunities to ensure the long-term genetic health of the species will be lost. By the Service's own admission "Grizzly bears are currently found approximately halfway between the NCDE and GYE areas and it is likely that these populations will connect in the near future through natural dispersal and movements." (https://www.fws.gov/mountain-prairie/es/GYE%20Grizzly-FAQs.pdf) However, the habitat connectivity required to allow for continued levels of gene flow that would allow these subpopulations to function as a metapopulation will require continued federal coordination to achieve, and without the ESA listing, strong protections will not be in place for dispersing bears outside the PCA. Designating the GYE population as a DPS, while it may be technically acceptable according to the Service's policy, is short-sighted with respect to the current status of the GYE and NCDE populations, and the central importance of future connectivity between them. Shafer (2015) stated "Although heroic efforts have been underway to facilitate corridor creation, the opportunity to allow for a more permeable landscape so the GYE grizzly bear population can disperse to the NCDE or the Bitterroot-Selway-Frank Church River of No Return wilderness complex, or vice versa, will not last indefinitely." It is not enough that " Approaches for increasing the likelihood of natural movement of grizzly bears and genetic interchange between the GYE and the NCDE populations, have been outlined in the Conservation Strategy." The Service needs to stay the course and continue to protect the GYE population (and most critically, dispersing bears from both populations) under the ESA until they can be reconnected.	FWS-R6-ES-2016-0042-5488	

I am very concerned about the FWS proposal to delist the grizzly bear. I do not feel that FWS has provided adequate information for an educated decision on the delisting. Jackson WY was an obvious location for a public hearing. I am very curious as to why FWS did not allow the citizens located in the middle of grizzly bear country to have a forum for discussion on such an important topic. A 60 day comment period is just too short of a timeframe to gather a comprehensive look at public opinion. By disregarding obvious locations and limiting input time, FWS seems to be trying to skew the decision in their favor.			Recovery	I am very concerned about the FWS proposal to delist the grizzly bear. I do not feel that FWS has provided adequate information for an educated decision on the delisting. Jackson WY was an obvious location for a public hearing. I am very curious as to why FWS did not allow the citizens located in the middle of grizzly bear country to have a forum for discussion on such an important topic. A 60 day comment period is just too short of a timeframe to gather a comprehensive look at public opinion. By disregarding obvious locations and limiting input time, FWS seems to be trying to skew the decision in their favor. Another issue is the fact that Montana and Idaho have not published their state management plans. Where are they? Is anyone working on them? As a Montana resident it is essential for me to know and understand the plan before I can form an educated opinion on delisting the grizzly. FWS has not taken into account the effects of climate change on the grizzly's food sources and habitat. Grizzlies can adapt to changing food sources and availability, but FWS has failed to provide conclusive research to show that the bears can adapt quickly enough to keep up with the increased rate of change. Specifically, the diminished habitat for the army cutworm moth, threatened cutthroat trout populations, and the decimation of the white bark pine due to blister rust and pine beetles. The research /data that has been presented is insufficient in duration. Before delisting can be considered, comprehensive studies over a longer period of time will need to be carried out. More time will give biologists and the public correct information on food source sustainability. Other data presented by FWS said that bison were not a significant source of food. Research was done in the Yellowstone Lake area where there are few bison, but what about Lamar Valley where bison are plentiful? Once again this data is skewed and insufficient. FWS reasons for delisting lacks plausibility because of the lack of research carried out over a sufficient amount of time and data on too small of a population to be generalized. I will not support delisting when FWS has not taken climate change, diminished food supply, and threatened habitat fully into account. Lack of published state plans, a short comment period, and poor public hearing site choices makes me wonder if FWS is bowing to political pressure to push the delisting through for specific interest groups. The grizzly bears should be allowed to thrive, not just maintain an existence.	FWS-R6-ES-2016-0042-5552	
FWS has not taken into account the effects of climate change on the grizzly's food sources and habitat. Grizzlies can adapt to changing food sources and availability, but FWS has failed to provide conclusive research to show that the bears can adapt quickly enough to keep up with the increased rate of change. Specifically, the diminished habitat for the army cutworm moth, threatened cutthroat trout populations, and the decimation of the white bark pine due to blister rust and pine beetles. The research /data that has been presented is insufficient in duration.			Recovery	I am very concerned about the FWS proposal to delist the grizzly bear. I do not feel that FWS has provided adequate information for an educated decision on the delisting. Jackson WY was an obvious location for a public hearing. I am very curious as to why FWS did not allow the citizens located in the middle of grizzly bear country to have a forum for discussion on such an important topic. A 60 day comment period is just too short of a timeframe to gather a comprehensive look at public opinion. By disregarding obvious locations and limiting input time, FWS seems to be trying to skew the decision in their favor. Another issue is the fact that Montana and Idaho have not published their state management plans. Where are they? Is anyone working on them? As a Montana resident it is essential for me to know and understand the plan before I can form an educated opinion on delisting the grizzly. FWS has not taken into account the effects of climate change on the grizzly's food sources and habitat. Grizzlies can adapt to changing food sources and availability, but FWS has failed to provide conclusive research to show that the bears can adapt quickly enough to keep up with the increased rate of change. Specifically, the diminished habitat for the army cutworm moth, threatened cutthroat trout populations, and the decimation of the white bark pine due to blister rust and pine beetles. The research /data that has been presented is insufficient in duration. Before delisting can be considered, comprehensive studies over a longer period of time will need to be carried out. More time will give biologists and the public correct information on food source sustainability. Other data presented by FWS said that bison were not a significant source of food. Research was done in the Yellowstone Lake area where there are few bison, but what about Lamar Valley where bison are plentiful? Once again this data is skewed and insufficient. FWS reasons for delisting lacks plausibility because of the lack of research carried out over a sufficient amount of time and data on too small of a population to be generalized. I will not support delisting when FWS has not taken climate change, diminished food supply, and threatened habitat fully into account. Lack of published state plans, a short comment period, and poor public hearing site choices makes me wonder if FWS is bowing to political pressure to push the delisting through for specific interest groups. The grizzly bears should be allowed to thrive, not just maintain an existence.	FWS-R6-ES-2016-0042-5552	
Historically, the states of Wyoming, Montana and especially Idaho have done a very poor job in protecting this iconic species. Before the ESA was enacted and implemented in 1974 , the grizzly bear population in the GYE was under 200 and certainly headed towards extirpation without the timely intervention and sound recovery plan of the USFWS. If delisting occurs, what's to prevent the states involved from botching the current success achieved by the federal agency.			Recovery	I oppose the delisting of ursus arctos horribilis in the GYE ecosystem by the USFWS for some of the following reasons: 1. Politics vs Science It appears as though current grizzly bear population estimates in the GYE are made with political expediency in mind. For example, Idaho Fish and Game claim the GYE grizzly population exceeds 1,000 bears while the USFWS claims about 760 bears currently reside in the GYE. This amounts to a 24% disparity between agencies. This , of course, does not meet scientific scrutiny . 2. I would like to see cross scientific methods used to establish the current population in the GYE in order to improve the accuracy of the count. Use a DNA rub study in conjunction with radio collaring , field observation and spatial habitat modeling and analysis as was done in the NCDE recently. I know that there were overtures made to the IGBST to conduct a DNA rub analysis in the GYE a few years back which was meant with vehement resistance. 3. Historically, the states of Wyoming, Montana and especially Idaho have done a very poor job in protecting this iconic species. Before the ESA was enacted and implemented in 1974 , the grizzly bear population in the GYE was under 200 and certainly headed towards extirpation without the timely intervention and sound recovery plan of the USFWS. If delisting occurs, what's to prevent the states involved from botching the current success achieved by the federal agency. 4. Knowing that the grizzly has one of the lowest reproductive rates and a cub of the year mortality rate of 50% , there is very little room for error. 5. Why can't the USFWS place more resources towards colonization by grizzlies into all suitable habitat within the GYE, primarily working on reducing human-bear conflicts in areas where bears have not existed for the past 50+ years? Again, I would delay delisting until a viable population is established in the Bitterroot- Selway ecosystem in west central Idaho either through natural immigration or translocation.	FWS-R6-ES-2016-0042-5574	