

Trigger Text	Code(s)	Unit Text	Document ID	Annotation Notes
The Association is concerned with the expansion in the conservation strategy inclusion of areas specifically acknowledged as socially unacceptable for GB recovery. These include the southern end of the Wind River I\lountains and a portion of the Grey's River I\lanagement Unit on the Wyoming/Salt River Ranges. WACD believes it is imperative that the Service recognize that in the discussion of "voluntaryrelinquishment" of grazing allotments, and subsequent buy out of these by NGOs is not truly voluntary. It is only under duress that these "voluntary" relinquishments occur.	Comments on concurrent documents	The Wyoming Association of Conservations Districts (WACD) appreciates the opportunity to comment on the proposed delisting of the grizzly bear. The WACD represents Wyoming's 34 local conservation districts which are political subdivisions of state government. The local Districts are charged statutorily with natural resource conservation, including water, soil, range and wildlife habitat. Further, the districts have statutory responsibility to work with the private land owners to conserve their natural resources and provide for economic stability and sustainability. 11-16- 101 et. seq., The Greater Yellowstone Ecosystem grizzly bear population has been recovered for some time. It is appropriate for the Service to delist. This is an example of species conservation success, in no small part due to the efforts of the state wildlife management agencies and those living and working within the grizzly bear areas, and delisting should be pursued expeditiously. Given the WACD's responsibility to provide for a balanced approach to both conservation objectives as well as stability in the industry, we believe it is imperative that the management of bears be transferred to the states. The private landowners in Wyoming provide significant habitat for wildlife resources. For example, the statewide distribution of habitat is 55%, 40%, and 58% of pronghorn, elk, and mule deer winter range, respectively, is in private ownership. The statewide distribution of privately-owned Greater Sage-grouse core habitat is approximately 35%. This habitat is provided by predominately working ranches. These same private landowners are experiencing significant losses from both grizzly bears and wolves, hence continuing to put pressure on their ability to maintain economically viable operations. The Association is deeply concerned that without a balanced approach to species conservation and protection, which recognizes and includes a recognition of the contribution private working ranchingWACD Comments; Grizzly Bear delisting May 10, 2016Page 2... landscapes provide for multiple species and ecosystem services, the resulting consequence will ultimately be a loss of habitat as these ranges are sold and subdivided. The Association is concerned with the expansion in the conservation strategy inclusion of areas specifically acknowledged as socially unacceptable for GB recovery. These include the southern end of the Wind River I\lountains and a portion of the Grey's River I\lanagement Unit on the Wyoming/Salt River Ranges. WACD believes it is imperative that the Service recognize that in the discussion of "voluntary relinquishment" of grazing allotments, and subsequent buy out of these by NGOs is not truly voluntary. It is only under duress that these "voluntary" relinquishments occur. Further, again the Association would reiterate for every action there is a consequence. One that in the case of further reduction of working ranches in the west, results in a loss of habitat for a myriad of species. The recovery of the grizzly bear has been achieved in a large part due to the actions of the state wildlife management agencies and the citizens within the GYE bear areas. It is past time for the management authority to be restored to the states.	FWS-R6-ES-2016-0042-5324-A1.pdf	
This population is still clearly endangered - more study is needed for a complete understanding of what will allow for a healthy and sustainable population to continue into the	Data doubts and	. Â· ex, Public Comments Processing Attn: Docket No. FWS-R6â€”ES-2015-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. 'Tlâ€™~I@2â€™™E: [5 /\â€™~BsÂxi.uÂ-CQ_;Z Nm Â§iâ€™~Z.."LL;j] . jg] ggg 'P><Â¢2S1' <bl:â€™~Tl:\<E- Ecogsg AN; clout; esswÃ©gg jggit E:] @" Lt. S. ;;;,tts>t_Â¢F.Â¢; f{(Â£â€™”i-.. f' f@ 'B=-=Â·=â€™”=â€™” Â©Â©iz. gl \$§71 I~Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. }â€™™Â¢EPÂ¢SÂ£,Qgiu 'I D E.-- br.l'[Z 4;-[5 glu ZLLV gÃ©glg vu ng [Hi guicrnyn} gwrluguygi my mg M0 6 Z; g gy we cr. CONrJÂ£.cTc,0 Âxlr ,l;{&\$;]1l;[EM [C gow gig J5 egg/cg;) , Ai-Jâ€™~O A; ?0@vcNrzm <rF gÃ©ggf gggc/=t> gf ALwvJE0 IQ ru gz 5-scw/lj â€™” E rrrgggqq ;. 5 r,ggJ Hm L c U; Yifi Q {[546 g Q . gcgccica ll QE BRC-NAA/Â· Nâ,-7~Public Comments Processing Attn: Docket No. FWS-R6-ESâ€™”2016-0042 U.S. Fish and Wildlife Service VIS:BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. .. _ j l 74/ /114 4iAl AÃ©Ã© Ka, wz. @23- we /44224 x4â€™™ T1; ..1 1. ul, Â·Â· /&Z6Dq zu .4 11 JL.;} A1 Â·Â· Â· AJ r . # i d'/4 7 Â¢ , _ 1 / / Â·Â·â€™™ Â·- I . {J Q.. AQAM.4 _Â·Â· rz, ro i,I v JMX . â€™™ â€™” ;. new ,.. r' .4*:.; (H A _ M l if ln;Â·Â· â€™™ â€™” Â© mz /0 l Âx/me H,/1... F A./n. Al _ 1 â€™¢,Â·Â· ,. zi ,Â·Â· mi;; _ ' . rd;? _ Â·Â· Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. l " â€™” r r 1 l â€™” *4*%/ 14 llÂ· A Â· 5 ' l . , â€™” Â· G, r '	FWS-R6-ES-2016-0042-	

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Population Estimates Accurately estimating the number of bears in a large, rugged area like the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGRST to estimate bear population numbers has been seriously questioned in the near-	Data doubts and	On l\larch 11. 2016 the US Fish and Wildlife released a proposed rule in the Federal Fiegister (vol. 81, No. 48, pp. 13174 - 13227) for, Fiemoving the Greater Yellowstone Ecosystem Population of Grizzly Bears From the Federal List of Endangered and Threatened Wildlife; Proposed Fiule. Herein referred to as The Fiule. Dr. Christopher Servheen, Grizzly Bear Fiecovery Coordinator, U.S. Fish and Wildlife Service is lead author and primary contact for The Fiule.l\l\y name is Kathryn Iverson, resident of Edina, l\lN. l\l\y husband and l own property bordering the Northeast entrance to Yellowstone National Park. We fish, hike and camp in the Greater Yellowstone ecosystem. We have observed significant changes in this area, including huge die- offs of pines, (you can see the brown trees stretching across mountainsides, seeing evidence of warming waters in trout streams and lakes (algae blooms where none ever existed), as well as personally fishing at Yellowstone Lake with my grandsons, where we saw the tonnage of lake trout that are infiltrating Yellowstone Lake, and outcompeting the native cutthroat trout. Knowing that the grizzly bear is dependent on these ecosystems for survival, I urge the U.S. Fish & Wildlife Grizzly Bear Coordinator to share me deep concerns about delisting the Grizzly Bear from the Greater Yellowstone Ecosystem population. Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Fiule cavalierly dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. Carrying capacity The Fiule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Fiule). An alternative hypothesis that is not considered in The Fiule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement	FWS-R6-ES-2016-0042-	

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		YP'ziÃ©science for a changing world Fomxcmc Bumvion or Noam AMuucAu Bums David J. Mattson P.O. Box 5614, BLD 24 Southwest Biological Science Center Flagstaff, AZ 86011-5614 Colorado Plateau Research Station Phone: 928-556-7466 x 245 Northern Arizona University Email: David Mattson@usgs.gov Predation on Land-Dwelling Prey Even though all three North American bear species can be predators, the grizzly bear is more likely to kill larger terrestrial prey; either because of opportunity (compared to polar bears) or aptitude (compared to black bears). An adult grizzly is large enough to kill most adult ungulates, and equipped with claws, teeth, and power sufficient to deliver a killing blow. I\leat's ready digestibility also means that the typical bear will reap considerable rewards from predation. Bears locate larger land-dwelling prey, such as deer, elk, and moose, by a variety of methods and with varied intent. A certain number of encounters with potential prey are strictly by chance, apparently without deliberate stalk or search. This is typified by one incident where two grizzlies approached some elk behind a blind rise, without either species being aware of the other's presence. However, as soon as the elk came into sight, one of the bears lunged after them, but without success. This unfruitful result probably characterizes the vast majority of these chance encounters, however there are enough recorded kills in rolling terrain or otherwise visually opaque conditions to suggest occasional success under similar circumstances. On the other hand, the majority of observations suggest that both black and grizzly bears most often encounter their prey either after a deliberate search, characterized by movement in the direction of the hoped-for kill, or, with even greater forethought, by putting themselves in areas with concentrations of vulnerable prey. Elk and caribou calving grounds or traditional caribou river crossings are good examples of such areas where, either because of extreme young age, the preoccupations of birth, or the mass confusion of swimming animals, otherwise elusive ungulates become easy prey. This is most dramatically borne out by several graphic descriptions of observers such as Adolf I\lurie, Harry Reynolds, Kerry Gunther, and Steve and I\larilyn French, of contemporaneous pursuits, kills, and confrontations by grizzlies concentrated on calving grounds in Alaska and Wyoming. Bears clearly use all of their senses		

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The data is also incomplete as it fails to take into account all bears, & the threats to the population overall	Data doubts and comments on process	to track down prey. However, most observations suggest a prominent role for olfactory and audio cues. Bears have often been observed following scent trails associated with potential prey, sometimes for miles, or more convincingly, been seen killing calves at the culmination of a complex search mostly with nose to the ground. There are other phenomena that argue anecdotally for the prominence of hearing in tracking down meat. A number of hunters bugling for elk have surprised themselves by soliciting the apparently predatory interest of a grizzly bear. Concordantly, there is a consistently observed tendency world-wide for increased bear predation on both bull elk and bull moose during their fall ruts. Bears also seem to be attracted to the sound of gun-fire during the hunting season, one can only suppose with the intent of scavenging the gut pile and other remains of a hunter's kill. Although this likely orientation towards sound has not been conclusively demonstrated, it remains an intriguing possibility worthy of further study. Bears can chase down prey in open country, and are more successful at this tactic after separating a young calf from a cow-calf herd. Capture usually occurs after the pursuing bear cuts the corner on a fleeing calf that has been foolish enough to turn. However, most successful bear predations are not the result of long pursuits, but rather the result of a short-range rush either from ambush or after a stalk. Given the relative slowness of bears, at least compared to most wild ungulates, there is a distanceForaging Behavior ofBears . Mattson 2 at which this rush is more likely to be successful or, if not, then terminated. A number of records by different observers in different areas suggest that this "optimal" distance is around 20-50 m. Without the aid of mitigating conditions or tactics, it would be difficult for a bear to get this close to a reasonably alert and healthy ungulate, and so it should be no surprise that most kills are associated either with cover, conditions that hinder prey mobility, or the afflictions of exhaustion, disease, or raging sexual hormones in their prey. Thus, many documented predations have been in or near the edge of willow thickets and dense timber, often near running water; presumably under conditions that facilitate the unobserved approach of a predatory bear. Other predations occur on forest game trails, often as the prey negotiates deadfall or a small draw; under conditions where temporary imbalance or distraction would favor a successful ambush. Otherwise, bear researchers throughout the northern hemisphere have noted the remarkable success of bears preying upon winter-weakened ungulates in spring snow conditions. Surface crusts form that can support the weight of a broad-footed bear but not a larger-bodied ungulate such as an elk, moose, or muskox. Under these conditions the delivery of a killing bite is more often a constraint than over-taking the prey. Similarly, exhausted and/or hormonally-deluded bulls seem to make relatively easy bear prey during and after the fall ruts. One extraordinary story from Siberia recounts a brown bear that lured a rutting bull moose into a willow thicket by imitating the bull's mating roar. Grizzly bears kill land-dwelling prey primarily one of two ways. I\lost often they maneuver to approach over the back, after which they grab the animal around the rib-cage and, if successful, deliver a killing bite to the back of the neck or skull. A bite to the small of the back may be a prelude to this finishing move, or an animal that escapes the first attempted neck bite may be severely wounded on the flanks by the bear's claws as they are disengaged from their hold. An approach from the rear is also the logical consequence of a chase, and on occasion the bear may use its weight to collapse the hind- quarters of an animal that has just been caught. The next most common kill technique involves a bite to the nose and face that at least paralyzes and possibly kills the animal. Either way, the animal does not offer subsequent resistance. Interestingly, there are only a few reports of bears delivering killing or debilitating blows with their paws, and in most cases their paws come into play for such things as pinning down a newly-captured calf or grasping larger prey to facilitate delivery of a killing bite. Bears are able to consume between 12 and 40 kg of fresh meat in a day. However, consumption is not indiscriminate and typically reflects marked preference for some carcass parts. Almost universally, the most favored or at least first eaten portion of a female is the udder. After that, most bears eat the brisket and adjacent rib meat or the meaty proximal part of the front legs. I\lost carcasses are cleanly eviscerated soon after they are killed or found by a bear, with the heart, liver, and lungs selected for priority consumption. The skin, hair, rumen, and stomach are the most consistently unused soft parts of a carcass. In fact, a more-or-less neatly peeled off hide is one of the more diagnostic signatures of bear involvement. Bears are also one of the few consumers that can readily crack the major leg bones of a larger ungulate in pursuit of the marrow. Some bears even get into the habit of cracking the skull so that they can consume the brains. There are other features that distinguish carcass use by grizzly bears. If there are enough edibles to warrant the investment, a bear will typically bury the entire carcass or selected parts of it by scraping adjacent soil and litter over the tidbit with its front paws. Presumably this inhibits decomposition and the dissemination of scent that might attract competitors. As further sign of ownership, you might even find a bear sprawled directly on top of a carcass, attempting to rest while at the same time prevent pilfering by other scavengers. A bear may also move an intact or even partly consumed carcass to a spot more to its liking. If the carcass is not fresh, a drag trail of shed ungulate hair will connect the new carcass location with the rumen contents left at the original site of death. In addition, there are often bear beds nearby and a bear trail leading to the nearest available water (an apparent necessity when consuming such a protein-rich diet). As a final note on this type of predation - grizzlies exhibit marked preference for different sizes and species of ungulates. They are least likely to attack very large herd-dwelling animals that rely upon aggression for predator defense, epitomized by bison. Among the larger ungulates, they seem most likely to attack moose, presumably because of a solitary forest-dwelling existence that lends itself to ambush. However, within any given medium- to large-bodied prey species, bears preferentially prey upon young animals, especially the highly vulnerable neonates. On the other hand, although they are not	FWS-R6-ES-2016-0042-0513-A3.pdf	

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The USFWS carefully manages human-caused mortality based on scientific monitoring of the population. It is well documented that in years of low whitebark pine seed availability, grizzlybear-human interactions increase resulting in the mortality of grizzly bears. Again, the USFWS relies on a study from 2000-2012 to determine that the effect of low whitebark pine seeds andhuman caused mortality is negligible to grizzly bear population growth. However, the most extreme loss of whitebark pine occurred from 2009 through 2015. American Forests cautionsthe USFWS to conclude that the loss of whitebark pine is not felt by the grizzly bears.	Data doubts and comments on process	We appreciate the opportunity to provide comments regarding the removal of the Greater Yellowstone Ecosystem (GYE) population of grizzly bears from the federal list of endangered and threatened wildlife. American Forestsâ€™ mission is to restore threatened forest ecosystems and inspire people to value and protect our urban and wildland forests. As a primarily forested ecosystem, American Forests has a direct interest in the GYE and the status of its population of grizzly bears. Whitebark pine provides an important food source for grizzly bears. We have planted hundreds of thousands of disease resistant whitebark pines throughout its range, focused primarily in the GYE. We caution the U.S. Fish and Wildlife Service (USFWS) from removing grizzly bears from the list of endangered and threatened wildlife, as this forest type and important source of food is still recovering from the recent mountain pine beetle infestation. As stated in the proposed rule, out of the four common grizzly bear foods in the GYE, "only whitebark pine seeds are known to have an influence on grizzly bear mortality risk and reproduction." Due to their high fat content, whitebark pine seeds can be an important food source for bears in the GYE when they are available. Whitebark pine seed availability can influence the reproductive and survival rates as well as the movements of these grizzly bears. During years of low pine seed availability, bears foraging at lower elevations may be more likely to encounter humans which can also contribute to an increased potential for human-caused mortality. The whitebark pine is currently warranted for protected status under the Endangered Species Act but that action is precluded by higher priority actions. This interconnection between grizzly bears and whitebark pine is recognized in the scientific literature, primarily prior to the rapid decline of whitebark pine in the GYE due to the mountain pine beetle infestation. We are pleased the USFWS is addressing the Ninth Circuitâ€™s concerns regarding the evaluation of whitebark pine in the 2007 attempt to delist the GYE grizzly bears (Greater Yellowstone Coalition v. Servheen, et. al., 665 F.3d 105 (9th Cir. 2011)). American Forests appreciates the analysis of existing research regarding the recent decline of whitebark pine and the grizzly bear dependence on its seeds as a main source of food. However, we believe the impacts of the decline have not been fully understood because the recent infestation of mountain pine beetles has only recently subsided. While the studies conducted during this time show the grizzly bears turning to other food sources, resulting in little changes to their body mass or in the population growth rate, the sample sizes for these studies were small. The "Response of Yellowstone grizzly bears to changes in food resources; a synthesis" that the USFWS relies heavily upon for its1analysis cautions that more data is needed before it could be determined if there was truly a trend in the body condition of the grizzly bears. This further emphasizes that studies may not be conclusive and additional time is necessary to understand the impact of whitebark decline On the grizzly population. The USFWS carefully manages human-caused mortality based on scientific monitoring of the population. It is well documented that in years of low whitebark pine seed availability, grizzly bear-human interactions increase resulting in the mortality of grizzly bears. Again, the USFWS relies on a study from 2000-2012 to determine that the effect of low whitebark pine seeds and human caused mortality is negligible to grizzly bear population growth. However, the most extreme loss of whitebark pine occurred from 2009 through 2015. American Forests cautions the USFWS to conclude that the loss of whitebark pine is not felt by the grizzly bears. As a key food source for grizzly bears in the GYE, we believe the full impact of the decline in whitebark pines has not been adequately studied since the infestation of mountain pine beetles is only now waning. American Forests agrees that, eventually, grizzly bears in the GYE could be removed and touted as a success of the Endangered Species Act. However, that time is not now as the whitebark pine seeds continue to play a large role in grizzly bear recovery. While great effort has occurred to restore whitebark pine to the GYE, much more is needed. American Forests will continue to play our role in restoring the whitebark pine to the GYE. We look forward to working with the USFWS, US Forest Service, State natural resource agencies and others to implement a more comprehensive restoration strategy for the whitebark pine ecosystem which can complement long term management of grizzly bears in the GYE and other parts of their range.	FWS-R6-ES-2016-0042-5157-A1.pdf	

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Chaos 2 the statistical program by Ann Chao a professor in Tiawan is used to estimate all manner of species. No detailed field of studies have been published to confirm theoretical predictions. A few days of fly overs on this dense and diversified terrain is highly speculative.	Data doubts and comments on process	jÃ©yziz FdfciÃ©ba Ah_â€œ= E"J- MQLJLQ L,OIQJTI L; __ ` 4 T Â°Â· M0 D - Â°Â¢Â·*Ã©n.s On, __-â€” _! ***5* Spd O 7"ggg "TLJ ,. PMGRRMG B6 STRAP- =Â· ,0 .. __ Safe" G0 QROOLUSBJRK,. :_ _ it 'V\g_, BAJOAGP- kg P6 cock-S L- COT TD _rf](LT' Â°*JJÂ·!Â¤Q,H is *9. QT')? 1g.kce MQ mwn gg gv l- J â€”Â¤ __ mi {- l .-, l __ yl. LLYLE/3 vv Afrunctstu \$L]lâ€™Â¤ll1â¤,- .â€” :1 Z ' V' L J , â€”Â· 7;; l Â·â€” l kA Â» IT. (l' l . . T1. . M V 1Â·Â»l 1 ai it C) l Â·Â· V1 ll _ ,3; Â»- l ., __. l t _J" lg ; OU O dlâ,- W V. "" *5 . h _ , l j ,_ QQQ â€”- - l _ . l _ bear inxcmxzicxu will iucrusz, and l llllllllllllEBIBll __ EXIIFBSSYDIIUVIEYlwm me ,2 \$â€™™ 3Â¤~vÂ¤Â¤rÂ¤=Â¤Â¤vÂ¤1rÂ¤1uÂ¤hÂ¤srÂ¤=u:Â¤diÂ¤ mmzÂ¤.2Â¤Â¤s angdymusgnm _; dÂ¤Â¤bliÂ¤uhÂ¤bÂ¤:rpÂ¤pulÂ¤:iÂ¤Â¤iÂ¤Â¤hÂ¤ mÂ¤Â¤Â¤Â¤:Â¤Â¤Â¤my'sÂ¤Â¤nÂ¤Â¤Â¤Â¤Â»Â¤q emmpmmmuwmuwm * l ldl Cnurpirnmy, sÂ¤sÂ¤Â¤cÂ¤1theserÂ¤m.arhÂ¤bleÂ¤Â·canuns. lllll rythe Urwnqsiy Rnher um dnuuiug the gziulymi P wYÂ¤Â¤Â¤8 mumshmaldbelpohngfcwzystc QQ ngicmtntthemnhmmdwhidnmmm lm isolmd, and Lha:muÂ¤abÂ¤Â¤ch1Â¤wledgÂ¢daÂ¤dÂ¤1eÂ· gzlzebennrwÃ©naiihuuwgfug mg thrÂ¤Â¤Â¤thÂ¤u:hab:Â¤1md{Â¤Â¤sup- bmzd. wÂ¤#.h1largerÂ¤Â¤d1Â¤;Â¤Â¤:Â¤,mddÂ¤veL l l Huwевr,!huna:e:nÂ·l:Â¤ycÂ¤mpe1- oping biological cnrridcrs between lfiÂ¤*YPÂ¤pu11dcÂ¤sÂ¤Â¤helpeÂ¤n;re Â·` leszupmupremagumtztgagdpw genetic and the Thzgrizrly bÂ¤uÂ·,perh.:pamnm l IIS:rv:cetÂ¤Â¤haÂ¤ln:l:c:1:thÂ¤dc11sÂ¤ngplan pgpulaumrpmjmmbkutngcqedc tlunanyÂ¤thÂ¤Â·wl1dHfÂ¤spcdÂ¤,z:prcÂ· Â· grumturb. upubliccomment scnmhzwilduneslhatshapedusu Â· Inmlllll0d has beam mmdqd through andsecuudgndthudaguusmswunlafx an Ameriunpcupln, and it summa lÂ¤gÂ¤pu.latcad:smui:Â¤d.InbreedÂ· iugpamnuadzuttntthegunetindi- vcmry cnt lhjw jug, mgm, 1 e-mdlthurcuncurusdunngtheinal Whi.lebÂ¤.Â¤h1YellÂ¢pvgtm1efccdm m' human development, :1 m in sÂ¤mnvÂ¤yscmÂ¤lqnedh1Â¤Â¤-iÂ¤gth:y 3 tmdcrstandthatthurmctucnual sÂ¤] Â¢ivciÂ¤g:uÂ·mldÂ¤â€”phyiÂ¤guixh gf FW lf lilies; beartgthe plglawuealscszmfastiugcude- blisumngnacaidguailyimpnnnd lik wnhymfm S : uyms whale causes almg l cnuzimdleabenrbeingchased T iu _thc_prÂ¤Â¤Â¤.lÂ§othÂ¤ftbeseth:Â·gzÂ¤ l . wiped out loud pnpuladmu, until ruchzblz [gm l l mqwptbuamdmmnamyvmau MgecutmenmgnumdbeetleIntu- l l l BCOIDQGIBEEFEWYQDNQIE. Â¤uÂ¤Â¤;NÂ¤\Â¤up:.SmdiÂ¤byÂ¤hÂ¤Naz- uillnnededtamslrethazirrunaim l ll Montana. l Â·a ixmchfnrcurchildnnmdgrmd- WTÂ·Â¤=Â¤ zrmba nuvumy men uhikkm. l Â·Â· The Endmgezedspedukz has l llgsoduuepgzladcnwaqcnimaradu l .- bean. tnqnordmatedeinru bemint.heg:Â¤t:rYcJ1Â¤ustÂ¤x1zc:Â¤- ' Â· qÂ¤mandnedl5rthÂ¤EÂ\$A,gmÂ¤pgÂ¤- cunglgmnmaumunsejiinqcdud hahna: fungnmiznadanmmnvnpsncwcc mndnuwnthcirmadwncnvuy. Â¤Â¤Â¤Â¤ystcm_ uu wwwmwuuw . . y Hcrmgdmgu r lub; Pl fmarwimzduhggÃ©'lf` . -'	FWS-R6-ES-2016-0042-5674-A1.pdf	
Mortality counts on reported deaths, bears that have to be removed, and highly under estimated statistics have not been verified by in depth field studies.	Data doubts and comments on process	U.S. Fish and Wildlife Service Nlountm-Prairie Region Yellowstone Grizzly Bear 1-r~:+.~â€”r-s. Â§ ~Â·~ Y . Â·-l" `-.Â·â€” - P l t"" P dD l' t' Â· Â· OpU 8 IOl1 l'Op0S9 9 IS Ing Comment Form The U.S. Fish and Wildlife Service (Service) is accepting written comments on the Greater Yellowstone Ecosystem grizzly bear population proposed delisting rule, the draft supplement to the 1993 Grizzly Bear Recovery Plan for the Yellowstone grizzly bear population and the draft 2016 Conservation Strategy. The recovery of the Yellowstone grizzly bear population serves as a remarkable Endangered Species Act success story. It is the â€™â€” " l resiilt of strong partnerships among the Service, federal and state agencies, tribes and other partners. Yellowstone grizzly bear numbers have rebounded from as few as 136 bears when listed in 1975 to an estimated population of more than 70o today. There is now a sustainable and resilient population that occupies the entire available habitat. The population is at or near the lOlâ€™™lg-(EFIT1 CBITyIl1g capacity. To comment, return this form by mail to the address on the reverse side. Fold t ' ' 's with the return address showing, tape it closed, affix a stamp, and mail. You may attach additional page . t also be submitted for Docket No. FVV\$â€”R6-E5-2015-0042 via www.regulations.gov. For your comments to be the most effective, the Service suggests the following guidelines: Q â€¢ Be specific. Give defined reasons, not broad statements, or opinions. â€¢ Share site-specific observations, data, or knowledge. DÂ§3gfPÂ°hÂ°yâ€¢MTE Programs â€¢ Detail important environmental and community factors. Â· Be timely. Comments are requested by May io, 211:6 to be considered in the final rule. Â· This is not a voting process. Petition signatures typically only express an op?nion, which is not helpful in our decision making. 9 gâ€”,,B;{-3-â€”, E 5 FA. G1; 1 Qsej [5 dnrcfg gcoioÃ© 5 Roo gp Omg, Â§Â¢ittg.g3Â¤â€” Beans B ,,, D 9,,,9, tr Qo,;1â€”1â€” nada gas. a an i3oaÂ¤1i>nÂ¢2Â·Â¤.=s -gr2eÂ¤Â¤â€”;Â· Q E5 Q; } [egg; Q BLU NQ. RU, g' DÂ¢ci, QISBB QQo5s Fog iq og L-QQ Q 5 ,90, gorvu-:~0,79,; Q6 gswis. Turf. Qt:-Fin.S ;g H6 dl Rag; {3 gag; 3,;;; Q go Q 653 gpm ,g,;;{a_g_ Q} glo Q -Â·, B may oo 0 g 1;;; mg ga PoltrÃ©.0 To Ga ga Moms Q, 3 mo rig, , g moblog Gcwmgrac .s vn 1â€”1c.rÂ·cÂ·.s klgdci No â€”-, 3156:6 D;Q1i":ag B V pi) 013 Q7 pi gn; lc Q ,5 ro g 1,5.5. You may insert additional pages. Please provide your contact information. Before Including your address, phone number, eÂ·mail address, or other personal identifying Information In your comment, you should be aware that your entire commentâ€”Including your personal identifying Informationâ€”may be made publicly available at any time. While you may ask us In your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.	FWS-R6-ES-2016-0042-5676-A1.pdf	

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Population Estimates Accurately estimating the number of bears in a large, rugged area like the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has x not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review.	Data doubts and comments on process	As a resident of the state of Idaho, I know first hand Idaho state agencies do not have the moral gumption or leadership to “manage” grizzly bears. The Idaho Department of Fish and Game has proven this with their killing programs associated with wolves. They have also proven their inability to prosecute individuals who kills species protected under the Endangered Species Act. Allowing state agencies to care for our wildlife particularly in Montana, Idaho, and Wyoming has proven fatal and devastating to the health of ecosystems . I concur with the following statement created by the Park County Environmental Council. On March 11, 2016 the US Fish and Wildlife released a proposed rule in the Federal Register (vol. 81, No. 48 , pp. 13174 - 13227) for, Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears From the Federal List of Endangered and Threatened Wildlife; Proposed Rule. Herein referred to as The Rule. Dr. Christopher Servheen, Grizzly Bear Recovery Coordinator, U.S. Fish and Wildlife Service is lead author and primary contact for The Rule . The Interagency Grizzly Bear Study Team (IGBST) is the lead organization responsible for research and monitoring efforts on grizzly bears in the Greater Yellowstone Ecosystem (GYE). There is a public comment period until May 10, 2016. The following are major points are of concern identified with this proposed delisting action. Excessive, unsustainable mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection of the Threatened and Endangered Species act. Removing T&E protection and placing it in the hands of the three states of Idaho, Montana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Climate Change Impacts The impact of climate change on Yellowstone's grizzlies is summarily dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the blithe statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they m igrate into high-elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has . Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). An alternative , and more reasonable, hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, prim arily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement for "best science" as required by law. Genetic viability The Greater Yellowstone grizzly population is isolated from all other grizzly populations (pp . 1319 0-13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly population is seriously flawed and violates the requisite principle of "Best Science." Population Estimates Accurately estimating the number of bears in a large, rugged area like the Greater Yellowstone	FWS-R6-ES-2016-0042-5313-A1.docx	

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		the requisite principle of “best science.” Population Estimates – Accurately estimating the number of bears in a large, rugged area like the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review. Scientific Accountability The IGBST has been less than transparent about making taxpayer funded data (which they have maintained an exclusive monopoly) available for scrutiny by the larger scientific community. All raw data on grizzly bears collected by government agencies should be made available to independent scientists. In view of the wide disagreement about delisting decisions, the USFWS should establish a review panel of independent, academically qualified scientists who are not involved in current grizzly bear research in the GYE. I also take issue with delisting the grizzly bear and opening up its population to hunting pressures. Grizzly bears are NOT recovered. Their gestation cycle is slow. Viable population numbers will be impossible to maintain with open season hunting. The vitriolic hate for grizzly bears and fear alone threaten the species. I have hopes that one day, grizzly bears will eventually repopulate the Selway Bitterroot Wilderness in north-central Idaho. This will never be possible if the State of Idaho is left to care for our bears. People will shoot the bears all in the name of generating revenues for the State of Idaho.		
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While the conclusions of certain studies upon which the FWS relies suggest that grizzly bears have reached their carrying capacity, there is ample support for an alternative theory that bears have lost their historic dietary staples and are now turning to both native and domestic ungulates, putting them in closer proximity to humans, wolves and/or other bears. While this shift is occurring it is impossible to predict whether and when the GYE grizzly bear population might reach "carrying capacity". FWS is not scientifically justified in concluding with certainty that the GYE population has reached long-term stability and is therefore secure for the foreseeable future. There is far too much uncertainty reflected in the current science to justify such a conclusion; rather, the best available science and the precautionary principle demands continued federal monitoring of this vulnerable population, which will only happen with continued ESA protection.	Data doubts and comments on process	We, the undersigned scientiic experts, are writing to express our strong opposition to the pmposal by the U.S. Fish and Wildlife Service (FWS) to remove the grizzly bears (Ursus arctos horribilir) living in the Greater Yellowstone Ecosystem (GYE) from protection as a threatened species under the Endangered Species Act (ESA),' leading to Northern Rockies statesâ€™ commencement of an imsustainable trophy- hnntingz season on GYE grizzly bears, which continue to be imperiled by resomee declines, including habitat and dietary staple losses. GYE grizzly bears are not recovered. Before 1800, approximately 50,000 grizzly bea.rs roamed the lower 48 states between Canada and Mexico} After European settlement, humans heavily persecuted grizzly bears to near eradication} Today, wild grizzly bears number fewer than 1,700 individuals in the lower 48 statts â€” while FWS claims that there are 700 grizzly bears in the GYE,Â° this is a contested figure.? Grimly bears have not recovered across a signincant portion of their range, and thus they are not recovered and should not be delisted. Trophy hunting grizzly bears would further jeopardize their persistence. Pursuant to a tri-state memo, Northem Rockies states have allocated bears for the purposes of "discretionary mortality available for regulated harvest" within the DemogÂ·raphic Monitoring Area (DMA) as follows: Wyoming would authorize hunting for 58% of the bear quota, Montana 34% and Idaho 8%.9 The number of grizzly bears states will permit for trophy hunting is unknown. While Wyoming has issued a draft grizzly bear management plan, it would inadequately protect GYE grizzly beats in the absence of a federal ESA listing because it gives broad discretion to the Wyoming Game Commission to set the manner of take (e.g., baiting, hounding, trapping, stalking), bag limits, seasons, sex ratios and age limits for grizzly bear hunting.'Â° How Idaho or Montana will permit grizzly bear hunting is also currently unknown. Under this veil of uncertainty, the FWS is rushing to close the public comment period (ignoring reasonable requests for a deadline extension justified by the voluminous documents released by FWS) in order to rapidly delist grizzly bears for what appear to be more political than scientiic reasons. Such action conflicts with the ESA requirement to make listing decisions solely on the basis ofthe best scientific evidence available and to seek meaningful public comment on listing decisions. Grizzly hears face multiple threats to persistence including the loss of their primary food resotuces. Currently, whitebark pine seeds, native cutthroat trout, huckleberries, army cutworm moths, elk and bison are either declining and/or are expected to decline in the foreseeable iitture as a result of habitat loss, climate change, drought, invasive species and other anthropogenic causes. Traditionally, whitebark pine seeds have provided a core dietary staple for g1Â·izzly bears. Yet, the whitebark pine, a species the FW S agrees warrants federal protection, is in decline because of a variety of problems}! Another key source ofsustenance, the cutthroat trout, has stopped spawning in all tributaries of Yellowstone Lake}2 Army cutworm moths, a staple for grizzly bears since the late l990â€™s, could likely disappear because they nectar on tundra flowers, which are highly vulnerable to global warming. Added to these threats to the sustainability ofthe GYE grizzly bear population, Yellowstoneâ€™s Jackson and Northern Range elk herds and its Central Range bison herd are all in decline); Because of warming summer temperatures and drought severity since 2005,M berries have become largely unavailable to grizzly bears. These food failuresâ€”whitebark pine, cutthroat trout, huckleberriesâ€”have caused grizzly bears to switch to a more meat-based diet, including domestic livestock. As a result, bears have been in conflict with humans, leading to record numbers of lethal actions taken against them." 'l'his additive mortality harms their persistence.'Â° Furthermore, biologists have noted that grizzly bear cub production has declined"â€” perhaps because of more predation on cubs by wolves and other bears as a result of their new dependence upon a meat-based diet., which puts them into greater proximity with other predators, resulting in deadly strife on grizzly bear cubs. The loss of flora and fauna upon which grizzly bears depend in Yellowstone and Grand Teton national parks, in part, explains why grizzly bears are dispersing in greater numbers from park lands to national forests lands, which are grazed by public lands permittees, to search for food. Because of ubiquitous livestock outside of park lands, record numbers of grizzly bears have had lethal encounters."; Worse, if grizzly bears are delisted, the GYE bears who already live or disperse outside of the DMAâ€™s artificial boundary will not be counted toward statesâ€™ population objectives and will likely be subject to persecution. Yet, these dispersing individuals are vital for providing connections between other populations, maintaining genetic diversity and preventing genetic drrjfi and inbreeding depressionalg While the conclusions of certain studies upon which the FWS relies suggest that grizzly bears have reached their carrying capacity, there is ample support for an alternative theory that bears have lost their historic dietary staples and are now tuming to both native and domestic ungulates, putting them in closer proximity to humans, wolves andlor other bears.2Â° While this shit} is occurring it is impossible to predict whether and when the GYE grizzly bear population might reach "ca.nying capacity". FWS is not scient'callyjustif1ed in concluding with certainty that the GYE population has reached long-term stability and is therefore secure for the foreseeable future. There is far too much uncertainty reflected in the current science to justify such a conclusion; rather, the best available science and the precautionary principle demands continued federal monitoring of this vulnerable population, which will only happen with continued ESA protection. The public highly values grizzly bears. In 2015, Yellowstone received 4.1 million visits and Grand Teton had 4.6 million contributing \$890 million to Wyomingâ€™s gateway communities, and \$1.1 billion to Wyomingâ€™s overall economy. These Hgures greatly outweigh revenues generated by either Wyomingâ€™s livestock or hunting industries? Grizzly bears, in the human economy, are worth far more alive than dead. For all of these reasons, we urge you not to remove grizzly bears hom protections under the BSA. Now is the time to redouble grizzly bear conservation efforts, not decrease ~Â·Â·Â·.	FWS-R6-ES-2016-0042-5687-A1.pdf	

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Moreover, estimates as to the population of grizzly bears in the GYE must be viewed with tremendous skepticism because it is impossible to do more than roughly estimate their population. Crude population estimates should not be relied upon in deciding whether to strip grizzly bears of protection that is essential to their survival.	Data doubts and comments on process	Christopher D. Meyer 210 S. 3rd Street Livingston, MT 59047 @0 406-222-1558~a~ Â 02* Public Comments Processing, ti? O Attn: Docket No. F U.S. Fish and Wildlife Service, MS: BPHC, ~ÂcÂ§"â€~Âc 5275 Leesburg Pike, Falls Church, VA 2204]-3803.May 7, 2016 Re: proposed rule that would delist Grizzl Bears in the Greater yellowstone Ecosystem (GYE) To whom this concerns: I write in opposition to your proposal to delist grizzly bears in the Greater Yellowstone Ecosystem (GYE). The best available science and commercial data do not show that the GYE population of grizzly bears has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act. Your proposal depends heavily upon the conclusion that the population of grizzly bears in the GYE has increased. By itself an increase in population is an insufficient ground to delist a species when immediate threats to its survival are obvious and ongoing. Moreover, estimates as to the population of grizzly bears in the GYE must be viewed with tremendous skepticism because it is impossible to do more than roughly estimate their population. Crude population estimates should not be relied upon in deciding whether to st1Â-ip grizzly bears of protection that is essential to their survival. It cannot be denied that the protection of grizzly bears under the Endangered Species Act has been critical to their limited recovery. I also oppose the proposal to delist grizzly bears in the GYE because it flatly ignores the inconvenient but incontrovertible scientific evidence of serious ongoing threats to grizzly bears in the GYE. Climate change is a continuing threat to grizzly bears. Whitebark pine trees, as one example, have been decimated by mountain pine beetles, white pine blister rust, and climate change. It is a documented fact that whitebark pine nuts are an important food source for grimly bears in the GYE, yet their number and availability decline each year, putting increased pressure on grizzly bears. Fish, another important source of food for grizzly bears in the GYE, are also under severe pressure because of climate change. Ever smaller snow packs, the result of climate change, have meant increasingly warm stream temperatures that damage fish populations in the GYE. Trout, for example, thrive in cold water, but river and stream temperatures in the GYE are rising in step with climate change. These injuries to grizzly bearsâ€™ food sources will only increase because climate change, by all credible scientific estimates, will worsen in the coming decades. Climate change has also led to more forest fires, of increasing severity, that damagegrizzly bear habitat and put additional stress upon them. And as a direct result of climate change, grizzly bears emerge earlier each year from their dens and they are increasingly hardpressed to find food then. Climate change is not a passing phenomenon: the scientific consensus is that its impacts will worsen with the passage of time. The threat to grizzly bears from climate change is serious and will worsen in the coming decades. Yet another serious threat to grizzly bears in the GYE is habitat destruction. Every year new homes and developments are built in the GYE, forcing grizzly bears to relocate and further damaging their food sources. Habitat destruction is also a major threat because grizzly bears in the GYE are at great risk of becoming an island or isolated community. Grizzly bears in the GYE are indistinguishable from grizzly bears in other parts of Montana. Because grizzly bears travel substantial distances, delisting them in the GYE necessarily threatens grizzly bears from other areas, too, in Montana, Idaho, and Wyoming. As habitat destruction increases, it will become more difficult for grizzly bears in the GYE to connect with other grizzly bear populations, rendering them increasingly vulnerable to disease and genetic issues as an island community.We need not speculate about the impact of climate change and habitat destruction upon grizzly bears in the GYE. In recent years grizzly bear mortality in the GYE has increased, not decreased, because of climate change and habitat destruction, the accelerating destruction of food sources for grizzly bears in the GYE, and the mounting pressure upon them to find new food sources even at the risk of conflict with humans. Montana, Idaho and Wyoming have announced that if the grizzly bear is delisted in the GYE, they will allow trophy hunting of grizzly bears. Grizzly bears, however, reproduce extremely slowly. Trophy hunting of grizzly bears will reduce their populations and their recovery from such hunting will be extremely diiiicult, especially when they must also reckon with the aforementioned challenges from climate change and habitat destruction. For all these reasons I object to the proposal to delist grizzly bears in the GYE and urge you to reconsider your proposal. You are charged with protecting these magnificent animals and you should honor that responsibility. Thank you.Since ly, L J Christopher D. Meyer2	FWS-R6-ES-2016-0042-5688-A1.pdf	

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Any decision about the bear’s future should be put on hold until independent scientific review can explore potential impacts to bears from climate change. We strongly suspect that America’s great bears face a dire future, even with the continued protection of the Endangered Species Act.	Data doubts and comments on process	We are writing to thank you for your leadership on climate change and to ask for your help: Yellowstone grizzly bears are in grave danger. Your administration has regrettably taken steps to strip the bear’s federal protections under the Endangered Species Act (ESA), Opening up a grizzly bear trophy hunt on the edges of Yellowstone National Park. Yellowstone’s bears are a remnant and isolated population. They must be allowed to wander safely Outside Of Yellowstone National Park. Americans would never accept hunting Of America’s bald eagle; hunting Yellowstone grizzly bears is equally unacceptable. To make matters worse, America’s great bears face the same looming threats as many species across the country due to climate change. In the last decade, climate change has decimated the Yellowstone grizzly’s most important food, the white bark pine nut. Unfortunately, the March 3, 2016, delisting announcement by the U.S. Fish and Wildlife Service (FWS) came paired with an astonishing declaration in the Federal Register: "Therefore, we conclude that the effects of climate change do not constitute a threat to the [Yellowstone grizzly bear population] now, nor are they anticipated to in the future." This statement is even more disturbing in light of your administration’s commitment to addressing climate change, because climate change predictions are dire for all our planet’s species. How can it be that the military considers climate change in all its decisions, while the agency responsible for our wildlife, the FWS, does not? The same argument- the denial of climate change – was used by the FWS in 2014 to deny listing the wolf in the 48 states. On April 4, 2016, that decision was reversed in federal court, and declared "arbitrary and capricious." The FWS was ordered to reconsider its reasoning about climate change. It’s now time for this federal agency to play catch up and use "the best available science" to keep grizzly bears on the ESA list. A critical question: Who benefits from delisting Yellowstone’s grizzly bears? The only certain outcome of delisting bears will be trophy hunts in Idaho, Montana and Wyoming. We ask you to instruct our federal wildlife managers to withdraw the March 3 rule and order the FWS to take another look at how climate change impacts grizzly bears. Any decision about the bear’s future should be put on hold until independent scientific review can explore potential impacts to bears from climate change. We strongly suspect that America’s great bears face a dire future, even with the continued protection of the Endangered Species Act.	FWS-R6-ES-2016-0042-5416-A1.pdf	
		US Fish & Wildlife Service COMMENT on draft proposal to Delist the Yellowstone Grizzly I am a Wyoming native who lives in Cody , 50 miles from Yellowstone Park on the edge of the Greater Yellowstone Ecosystem. Much of my life has been spent in the backcountry of the Absaroka Range in prime grizzly habitat, and countless hours in Yellowstone Park. I reckon I have had around 200 encounters with and close range sightings of Grizzly bears in my lifetime, all good. The Great Bear is a topic of major concern in my region. I've engaged the state and federal agencies on grizzlies and other issues for over 40 years. I feel qualified to give a considered opinion on Grizzly management. I am strongly opposed to the Delisting of the so-called Yellowstone Grizzly Bear. The proposal by USFWS to Delist the Grizzly and give management over to the states of Wyoming, Montana , and Idaho is flawed. The only reasons that justify grizzly delisting are political. The reasons against delisting are expressions of accumulated science, the ecology and range management aspects, habitat concerns , and the appalling prospect of allowing the State game agencies to "manage" grizzly bears given their track record and narrow views; e. g. the Wyoming Game and Fish draft plan for management falls apart if the goal is to assure a healthy bear population in the far future. Neither Fish & Wildlife nor Wyo Game and Fish have produced a plan to guarantee the Yellowstone Grizzly's sustainability based on the needs of the bears. All plans put forth are People Plans , not Bear Plans. Best Available Politics, not science , not genuine wildlife conservation. After 40 years and \$ 40 million in research and bear management , I expected a delisting plan that actually helped the bears. Instead we get proposals that bow to special interests and decidedly non-wildlife priorities. It is disappointing that delisting looks like this. We can do better. For an animal that once ranged from Hudson Bay in Canada's northeast , all the way to the Pacific Ocean coast , and south as far as Guadalajara Mexico , the proposal to sustain the Grizzly on an island with a hard population ceiling (700 bears) and a hard population floor (500 bears) with nearly zero opportunity for that island population to expand and interchange with other		

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The IGBST has deluded itself into thinking they have succeeded in recovering bears strictly by the numbers , when in fact the bears are in more danger now than they have been at any time since they were listed back in 1975. It's been a mark of shame that the raw data gathered by the IGBST and their tight circle of researchers has not been fully disseminated to qualified third parties for peer review and analysis. The so-called " Best Available Science" produced by Chris Servheen et al and the IGBST has been built to a conclusion with data massaged and computer models tweaked until it all fits the preconceived political outcome of fabricating bear numbers and management scenarios that appear to show a recovered, feisty, expanding bear population.	Data doubts and comments on process	grizzlies in the Rocky Mountains is patently absurd. I seem to recall back a couple decades ago that USFWS/ IGBST said they would endevaour to bring in 'outside' grizzly bears to augment the GYE gene pool. I feel strongly that when the Grizzly was originally listed as Threatened under the ESA back in 1975 , the starting population of (maybe) 130 grizzlies then was not sufficient for genetic viability. I still feel that way , and scientists have not convinced me otherwise. Talk is cheap. Mitochondrial DNA Analyses is a young science and not the USFWS' strongest suit. Forty years is far too short of a genetic interval to be manufacturing conclusions. Besides, the Yellowstone Grizzly is NOT a distinct population or even a subspecie of Ursus arctos . That is a deceit; a biological accounting trick. Sentencing the Grizzly to remain behind an artificial map line as a Distinct Population in a Demographic Monitoring Area is a huge falsehood. Surely Fish and Wildlife knows that Grizzlies are well suited to occupation of many areas of their former ranges and domains in the West . There is a lot of suitable habitat. Why doesn't USFWS have a mechanism to connect Yellowstone bears to the huge Selway-Bitterroot Wilderness of north central Idaho ? There should be provisions for safe passage in both directions from the Greater Yellowstone Ecosystem (GYE) to the Selway via the Red Rock Lakes wildlife refuge corridor. Bears should also be allowed to move up the Continental Divide north and west of Yellowstone towards Canada. The agency should also translocate GYE grizzlies to the San Juan Mountains of Colorado, and areas in northwest Colorado. The Uintah Mountains in northeast Utah should be considered for grizzly repopulation. It is disgusting to me personally that neither Grizzlies nor Grey Wolves are allowed to expand into other areas of my Wyoming without becoming a target for a rifle. The southern Wind River Mountains and Wyoming-Salt River Range deserve bears. A case could be made for the Pryor Mountains on the Montana-Wyoming border and the northern end of the adjacent Big Horn Mountains as new grizzly range. The Crow Tribe has said as much. You should listen to the Tribes on the topic of grizzlies. Frankly , if a Giant Panda bear can be relocated from the bamboo jungles of south China to the National Zoo in Washington D.C. it should be doable to move a grizzly from the North Fork of the Shoshone River at Yellowstone's east gate to the Selway-Bitterroot , a distance of 250 miles by helicopter. In both directions. That the USFWS has not instigated Grizzly Repopulation across the northern Rockies, and the State of Wyoming wants to keep X-numbers of bears inside a Zoo Zone, and not even count any bears outside that Zoo Zone as a component of bear recovery , is a terrible deceit. This one aspect ---lack of landscape expansion opportunities for the Yellowstone bear and lack of genetic connectivity with other bear populations in the Northern Rockies --- is enough to declare Delisting to be null and void. They Yellowstone Grizzly has been branded a Distinct Population Segment strictly for political reasons, and expediency. I reject that. The agency should instead look at the Yellowstone bear both as a sustainable population AND a seed population. Yet Wyoming wants to cull bear numbers to keep them in a Goldilocks gated community of not more than 700 nor less than 500 bears, and that culling will be done by hunting and other human caused mortality , i e. " management actions". Why not relocate ' surplus' bears instead , or if a problem bear raiding the tack shed or apple orchard, put them on unsupervised probation in another state with their electronic GPS necklaces ? Wyoming Game and Fish bear managers have been playing " Musical Bears" for a couple decades now , trapping bears and hauling them to some other release point over the mountain . Sometimes the same bears. Recidivist grizzlies. We have maybe six drop points in all of Wyoming. If we were doing it right, the management agency would relocate bears to 60 drop points across five states. Again , in both directions. Please do allocate the funds to buy a LOT of GPS radio collars. I am not at all opposed to trophy hunting of Grizzlies in Wyoming. I can support that . But only if the agencies agree that expanding and sustaining a growing bear population outside the proposed Grizzly DMA occurs first. We all know that in Wyoming, Grizzly Delisting is a euphemism for Hunting. Fine. So long as all the tools in the management toolbox , not just the .30-06 rifle with 3x-9x scope , are employed across the Big Picture Landscape of Idaho-Montana-Wyoming-Colorado-Utah - and ??? Grizzly Bears are worth far more alive than dead. The proposed delisting plans (state and federal) seem to emphasize more Dead than Alive when it comes to hands-on bear management. It is regrettable the attitude behind that is so baked in to existent wildlife technocrats and bureaucrats, and narrowminded stakeholders. It is almost as bad as the notion that bear biologists and bear managers actually believe they know bears. They...do...not. USFWS and the IGBST cannot justify delisting the Grizzly by saying it has recovered enough to survive the challenges it faces. We all agree there are a good number of bears...600...700...maybe more , maybe less. The problem is the bear's best food supplies in the core area of Yellowstone Park have collapsed...Cutthroat trout and Whitebark pine seeds. The gross supply of ungulate meat is in shorter supply inside Yellowstone as elk numbers decline. Outside the Park in the Absaroka Range alpine scree slopes the Army Cutworm moth larva are diminishing rapidly due to threats from pesticides and the GMO crop cycle in the lowlands and agribusiness areas of the Midwest . Yellowstone grizzly are becoming Absaroka grizzly and preying on more elk calves, and more livestock. Because of all this, the bears are spreading out , and actual bear density is decreasing over units of public lands. What seems like more bears out on the fringe of the GYE and the proposed DMA are bears that are searching further and wider for food sources. Bears have been spreading out since the early 2000's , and the population number probably peaked in about 2006 . The notion advanced by the IGBST that grizzly's " Omnviory " , the ability to eat a wide variety of vegetation in lieu of less animal protein , is a deception. Grizzlies want meat. Plants are a supplement but not a substitute in the bear's preferred diet. Would you as a human omnivore enjoy being forced to eat mostly salads and give up beef, chicken , pork , fish --- your meats ? Having to work harder and further afield for food is a big challenge to grizzlies, but the real drawdown of bears has been human caused mortalities. We've been killing 50 bears a year for some time...an alarmingly high percentage. The Whitebark pine seed crop has been thin ...not for lack of trees , but because of climate changes and the alien exotic blister rust. BEars simply cannot find the quantity of pine nuts they were having 15 years ago, and the situation is getting worse. When all the factors concerning the bear's food supplies start compounding and cascading, the result is bears coming into conflict zones with humans and their guns. The population dynamic of the Yellowstone Grizzly is at a tipping point, just at the time the humans want to ratchet up all the negative mortality factors affecting bears. The Delisting proposals are designed to do one thing well: reduce bear numbers. And that's about all it does. The IGBST has deluded itself into thinking they have succeeded in recovering bears strictly by the numbers , when in fact the bears are in more danger now than they have been at any time since they were listed back in 1975. It's been a mark of shame that the raw data gathered by the IGBST and their tight circle of researchers has not been fully disseminated to qualified third parties for peer review and analysis. The so-called " Best Available Science" produced by Chris Servheen et al and the IGBST has been built to a conclusion with data massaged and computer models tweaked until it all fits the preconceived political outcome of fabricating bear numbers and management scenarios that appear to show a recovered, feisty, expanding bear population. It all borders on fraud. Besides, it's not about bear numbers , it's about bear habitat. And that is the other Achilles Heel of the proposed grizzly delisting proposal and State plans. There is no provision for sustaining critical grizzly bear habitat requirements. Nothing in the proposals will implore the Forest Service, the BLM , or States to manage for bear habitat. Those agencies will automatically without remorse defer their decisions on behalf of special interests and human stakeholders perceptions. The Grizzly can look forward to more habitat fragmentation and	FWS-R6-ES-2016-0042-5487-A1.rtf	

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		decline of lifestyle should delisting proceed as planned. Forty years ago when the bear was listed under the ESA, you would not have been able to find ten scientists anywhere in the USA who would tell us that Global Climate Change would be a serious challenge in decades to come. Fast forward to today , and we cannot find ten scientists who disagree that Global CLimate Change is not a force majeure to be reckoned with ...in every location on the planet from below sea level to the crest of the Himalayas, on all continents. The Yellowstone Grizzly is already adversely affected by climate change , and it's not going to get better in the lifetimes of anyone reading this. Which is why strong habitat protections and enforced regulations of landscape scale issues are paramount. Too bad none of that is in the delisting proposal . The Yellowstone Grizzly's survival into the next century depends on us making the right decisions today . The Great Bear must be allowed to disperse into several surrounding states from the Yellowstone core. That dispersion must be both natural , without undue impediments. And where and when necessary we humans must relocate some numbers and demographics of bears further afield and return virile bears to the core to replenish the gene pool. I see little to nothing in the US Fish and Wildlife's intentions or the state of Wyoming's draft grizzly management plan that would guarantee the survival and virility of the Grizzly Bear in the face of the challenges it faces. I see a People Plan and a whole lotta delusional science, and some deleterious agendas at work disguised as " management". What I do not see is a genuine Grizzly bear Recovery Plan going forward that is actually based on bears, as one would think it should be. Therefore, management cannot be turned over to the States, and Fish and Wildlife as stewards of Endangered Species must retool their thinking a produce a Grizzly bear sustainability plan that puts the bears themselves at the top of the priorities. I reject the proposed Grizzly bear Delisting for all these reasons stated here, and more. Sincerely ; Dewey Vanderhoff Cody Wyoming - submitted electronically May 10 , 2016		
The plan is premature, fails to address the numerous risks this population will continue to face and does not provide adequate protections to ensure the long-term survival of this iconic species.	Delisting	I’ve been following the debate regarding USFWS proposed rule to delist Greater Yellowstone Ecosystem (GYE) grizzlies. There is so much information documented about the problems with this proposed rule, I won’t include those details in this letter. By now, you should have received a letter from Jane Goodall, E.O. Wilson and signed by over sixty leading biologists, strongly opposing the delisting of the GYE grizzlies. I urge you to listen to these experts. The plan is premature, fails to address the numerous risks this population will continue to face and does not provide adequate protections to ensure the long-term survival of this iconic species. When I first heard about the delisting - it caught me off guard. I’ve spent considerable time over the past few years learning about the plight of the elephants in Africa and supporting efforts to protect this incredible animal. I applaud the efforts of the Department of Interior to support conservation in Africa and around the world. But it is troubling to me that while we see the value of preserving the Big 5 in Africa we are at the same time willing to jeopardize our hard fought gains with the GYE grizzly. How can we remove ESA protections and tum management over to the states, who want to immediately begin sport trophy hunting of grizzly bears and who refuse to let grizzly bears access prime, biologically-suitable habitat on federal public lands? The proposed rule does not even protect grizzlies moving between the parks or grizzlies that may wander out of the park in search of food. Bears trying to disperse would be subject to hunting and removal, making connecting the GYE population with the northern population of bears impossible. Rather than making it harder for the populations to connect, we should redouble our efforts to help GYE grizzlies expand their range to connect with the northern grizzly population. Please do not remove the grizzly bears from protections under the ESA.	FWS-R6-ES-2016-0042-5662-A1.pdf	

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I am concerned that bears who live in the park and wander outside of the park, will be killed.	Delisting	. Â· ex, Public Comments Processing Attn: Docket No. FWS-R6â€”ES-2015-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. 'Tlâ€™~I@2â€™™E: [5 /\â€™~BsÂ¤i.uÂ·CQ_;Z Nm Âšîâ€™~Z.."LL;j] . jg] ggg 'P><Â¢2S1' <bl:â€™~Tl:\<E- Ecogsg AN; clout; esswÃ©gg jggit E:] @" Lt. S. ;,,tts>t_Â¢F.Â¢; f[(Â£â€™"i-.. f` f@ 'B=-=Â·=â€™"=â€™" Â©Â·@iz. gl \$71 l~Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. }â€™™Â¢EPÂ¢SÂ£,Qgiu 'I D E.-- br.l' [Z 4;-[5 glu ZLLV gÃ©glg vu ng [Hi guicrnyn} gwrluguygi my mg M0 6 Z; g gy we cr. CONrJÂ£.cTc,0 Â¤lr ,l;{&\$;]1l;[EM [C gow gig J5 egg/cg;) , Ai-Jâ€™~O A; ?0@vcNrzvM <rF gÃ©ggf gggc/=t> gf ALwvJEO IQ ru gz 5-scw/lj â€™ E rrrgggqq ;. 5 r,gg,J Hm L c U; Yifi Q ([546 g Q . gcgcicca ll QE BRC-NAA/Â· Nâ·,-7~Public Comments Processing Attn: Docket No. FWS-R6-ESâ€”2016-0042 U.S. Fish and Wildlife Service VIS:BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. .._j l 74/ /114 4IAI AÃ©Ã© Ka, wz. @23- we /44224 x4â€™™ T1; ..1 1. ul, Â·Â· /&Z6Dq zu .4 11 JL.;} A1 Â·Â·Â· AJ r . # i d'/4 7 Â¢ , _ 1 / / Â·Â·â€™™ Â·- I . {J Q,. AQAM.4 _Â·» rz, ro i,l v JMX . â€™™ â€™ ~ ;. new ,.. r' .4*;;. (H A _ M l if ln;Â·» â€™™ â€™ ~ Â© mz /O l Â¤/me H,/1... F A./n. Al _ 1 â€™¢,Â·» ,. zi ,Â·» mi;; _ ' . rd;? _ Â·» Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I " â€™ r r 1 l â€™” *4*%/ 14 llÂ· A Â· 5 ' l . , â€™” Â·» G, r ' ipidrll mobil E r' â€™ . A l lj 'YL V pi zazzF, "" JI ...L.'.Â·» :id . Lia @% __ rw/lll' *1 / P lÃ© gtzÃ©gztl~lÂ·` iâ€™œ` â€™ ~ `â€™~"Â· ..â€™~â€™~â€™iv Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife SenrlceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I lgfm gm {he viog /\L Â¤L www Aer 0 t/kskg 5 ok @ ul/All Eg Â· --`[ Avi/\ Qkgg gm; Qwvxeg ln a Ol `kfk â€™ LAAAQY -= AA \\A(Â·;* â€™¢ â€™™ ' A V\ Q~` Q' Q .i.31,_T Publlc Comments Processing Attn: Docket No. FWSâ€”R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. ggnii-L\r' l Â· _ Â· Â¤ J â€™¢â€™~l V l l i Public Comments Processing Q) Attn: Docket No. FWS-R6-ES-2016-0042 *lâ·,-'H' Bâ€™™BlO9.Y` U.S. Fish and Wildlife Service . szvs Leesburg Pike Gp ze mw. M T" Falls Church, VA 22041-3803 ( C; â€™~i 7 l S` _ iq Please accept my following comments on Fish and Wildlife Serviceâ€™s proposal to remove Endangered qcb _ . Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. lab? kv BB? glg? cov ygiew `Fâ€™™ 15 QE dlweoc Qvizzlrf lOQ.:c;/ g remgv-ed EgÃ©kgiig gg Sqdgg Ad". {Lrg; ggalwvcm ag still urccl -â€™"- vwgxe. Sjyglhfh igâ€™ZJ wevvc xi lg Q; ..~\0v~Q :v~Â·\l.P<.Jvâ€™™\2r/xlj apt/{ om});. jg â€™~B\\<JÂ¤=->%v h lmhifaljhi kaeav ygcwg ew [-eg @PE\glvÂ¤Â¤A Â· Pkifgg mgcwgrdcmgyg â€™~zÂ·Â·~.dL 2-No Lo uglggitq gm c.Â¤ 0 vypm~~ _ s -â€™ . 3% Public Comments Processing Attn: Docket No. FWS-R6â€”E5-2016-0042 U.S. Fish and Wildlife SenriceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. â€™~ 5 , 1 , l , â€™¢ ` Â· gÂ·».._n :.1...- 1 a V5l â€™¢. Kl O Â· E, .Â· nv â€™~ 0 & AAA O1 Â· â€™~ â€™” ' lazaxs La 4; .1 .. qquue-. 1 L.: &6Â¤4Y`vuL,â€™~iÂ¤`Ejofi	FWS-R6-ES-2016-0042-5663-A1.pdf	

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Delisting will only place more pressure on an already stressed population.	Delisting	. Â· ex, Public Comments Processing Attn: Docket No. FWS-R6â€™ES-2015-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. 'Tlâ€™~I@2â€™™E: [5 /\â€™~BsÂ¤i.uÂ·CQ_;Z Nm Âšîâ€™~Z.."LL;j] . jg] ggg 'P><Â¢2S1' <bl:â€™~Tl:\<E- Ecogsg AN; clout; esswÃ©gg jggit E:] @" Lt. S. ;,,tts>t_Â¢F.Â¢; f[(Â£â€™"i-.. f` f@ 'B=-=Â·=â€™"=â€™" Â©Â·@iz. gl \$571 I~Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. }â€™™Â¢EPÂ¢SÂ£,Qgiu 'I D E.-- br.l' [Z 4;-[5 glu ZLLV gÃ©glg vu ng [Hi guicrnyn} gwrluguygi my mg M0 6 Z; g gy we cr. CONrJÂ£.cTc,0 Â¤lr ,l;{&\$;]1l;[EM [C gow gig J5 egg/cg;) , Ai-Jâ€™~O A; ?0@vcNrzm <rF gÃ©ggf gggc/=t> gf ALwvJE0 IQ ru gz 5-scw/lj â€™ E rrrgggqq ;. 5 r,gg,J Hm L c U; Yifi Q ([546 g Q . gcgcica ll QE BRC-NAA/Â· Nâ,-7~Public Comments Processing Attn: Docket No. FWS-R6-ESâ€™2016-0042 U.S. Fish and Wildlife Service VIS:BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. .._j l 74/ /114 4IA AÃ©Ã© Ka, wz. @23- we /44224 x4â€™™ T1; ..1 1. ul, Â·Â· /&Z6Dq zu .4 11 JL.;} A1 Â·Â·Â· AJ r . # i d'/4 7 Â¢ , _ 1 / / Â·Â·â€™™ Â·- I . {J Q,. AQAM.4 _Â·» rz, ro i,l v JMX . â€™™ â€™~ ;. new ,.. r' .4*;;. (H A _ M l if In;Â·» â€™™ â€™~ Â© mz /O l Â¤/me H,/1... F A./n. Al _ 1 â€™¢,Â·» ,. zi ,Â·» mi;; _ ' . rd;? _ Â·» Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I " â€™~ r r 1 l â€™™ *4*%/ 14 llÂ· A Â· 5 ' l . , â€™™ Â·» G, r ' ipidrll mobil E r' â€™~ . A l lj 'YL V pi zazzF, "" JI ...L.'.Â·» :id . Lia @% __ rw/lll' *1 / P lÃ© gtzÃ©gztl~lÂ·` iâ€™œ` â€™~ `â€™~"Â· ..â€™~â€™~â€™~ iv Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife SenrlceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I lgfm gm {he viog /\L Â¤L www Aer 0 t/kskg 5 ok @ ul/All Eg Â· --`[ Avi/\ Qkgg gm; Qwvxeg ln a Ol `kfk â€™ LAAAQY -= AA \\A(Â·;* â€™¢ â€™™ ' A V\ Q~` Q' Q .i.31,_T Publlic Comments Processing Attn: Docket No. FWSâ€™R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. ggnii-L\r' l Â· _ Â· Â¤ J â€™¢â€™~l V l l i Public Comments Processing Q) Attn: Docket No. FWS-R6-ES-2016-0042 *lâ,-'H' Bâ€™™BlO9.Y` U.S. Fish and Wildlife Service . szvs Leesburg Pike Gp ze mw. M T" Falls Church, VA 22041-3803 ( C; â€™~i 7 l S` _ iq Please accept my following comments on Fish and Wildlife Serviceâ€™s proposal to remove Endangered qcb _ . Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. lab? kv BB? glg? cov ygiew `Fâ€™™ 15 QE dlweoc Qvizzlrf lOQ.:c;/ g remgv-ed EgÃ©kgiig gg Sqdgg Ad". {Lrg; ggalwvcm ag still urccl -â€™"- vwgxe. Sjyglhf igâ€™ZJ wevvc xi lg Q; ..~\0v~Q :v~Â·\l.P<.Jvâ€™™\2r/xlj apt/{ om);. jg â€™~B\\<JÂ¤=->%v h lmhifaljhi kaeav ygcwg ew [-eg @PE\glvÂ¤Â¤A Â· Pkifgg mgcwgrdcmyg â€™~zÂ·Â·~.dL 2-No Lo uglggitq gm c.Â¤ 0 vypm~~ _ s -â€™~ . 3% Public Comments Processing Attn: Docket No. FWS-R6â€™E5-2016-0042 U.S. Fish and Wildlife SenriceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. â€™~ 5 , 1 , l , â€™¢ ` Â· gÂ·».._n :.1...- 1 a V5l â€™¢. Kl O Â· E, .Â· nv â€™~ 0 & AAA O1 Â· â€™~ â€™™ ' lazaxs La 4; .1 .. qquue-. 1 L.: &6Â¤4Y`vuL,â€™~iÂ¤`Ejofi	FWS-R6-ES-2016-0042-5663-A1.pdf	

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It seems to me that delisting the grizzly is very premature given changes and loss in habitat, the spectre of trophy hunting. You should wait a few years to see what happens. Loss of white Bark Pine, loss of food, etc.	Delisting	. Â· ex, Public Comments Processing Attn: Docket No. FWS-R6â€”ES-2015-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. 'Tlâ€™~I@2â€™™E: [5 /\â€™~BsÂ¤i.uÂ·CQ_;Z Nm Âšîâ€™~Z.."LL;j] . jg] ggg 'P><Â¢2S1' <bl:â€™~Tl:\<E- Ecogsg AN; clout; esswÃ©gg jggit E:] @" Lt. S. ;,,tts>t_Â¢F.Â¢; f[(Â£â€™~i-.. f` f@ 'B=-=Â·=â€™=â€™” Â©Â·Â©iz. gl \$S\$71 I~Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. }â€™™Â¢EPÂ¢SÂ£,Qgiu 'I D E.-- br.l'[Z 4;-[5 glu ZLLV gÃ©glg vu ng [Hi guicrnyn} gwrluguygi my mg M0 6 Z; g gy we cr. CONrJÂ£.cTc,0 Âšlr ,l;{&\$;]1l;[EM [C gow gig J5 egg/cg;) , Ai-Jâ€™~O A; ?0@vcNrzm <rF gÃ©ggf gggc/=t> gf ALwvJE0 IQ ru gz 5-scw/lj â€™” E rrrgggqq ;. 5 r,gg,J Hm L c U; Yifi Q ([546 g Q . gcgcica ll QE BRC-NAA/Â· Nâ·,-7~Public Comments Processing Attn: Docket No. FWS-R6-ESâ€™”2016-0042 U.S. Fish and Wildlife Service VIS:BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. .._j l 74/ /114 4IAI AÃ©Â·Â© Ka, wz. @23- we /44224 x4â€™™ T1; ..1 1. ul, Â·Â· /&Z6Dq zu .4 11 JL.;} A1 Â·Â·Â· AJ r . # i d'/4 7 Â¢ , _ 1 / / Â·Â·â€™™ Â·- I . {J Q,. AQAM.4 _Â·» rz, ro i,l v JMX . â€™™ â€™” ;. new ,.. r' .4*;;. (H A _ M l if ln;Â·» â€™™ â€™” Â·Â© mz /O l Â·/me H,/1... F A./n. Al _ 1 â€™¢,Â·» ,. zi ,Â·» mi;; _ ' . rd;? _ Â·» Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I " â€™~ r r 1 l â€™” *4*%/ 14 llÂ· A Â· 5 ' l . , , â€™” Â·» G, r ' ipidrll mobil E r' â€™” . A l lj 'YL V pi zazzF, "" JI ...L.'.Â·» :id . Lia @% __ rw/lll' *1 / P lÃ© gtzÃ©gztl~lÂ·` iâ€™œ` â€™” `~â€™”Â· ..â€™~â€™~â€™œ iv Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife SenrlceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Serviceâ€™™s proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. l lgfm gm {he viog /\L ÂšL www Aer 0 t/kskg 5 ok @ ul/All Eg Â· --`[ Avi/\ Qkgg gm; Qwvxeg ln a Ol `kfk â€™” LAAAQY -= AA \\A(Â·;* â€™¢ â€™™ ' A V\ Q~` Q' Q .i.31,_T Public Comments Processing Attn: Docket No. FWSâ€™”R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. ggnii-L\r' l Â· _ Â· Â· J â€™¢â€™”l V l l i Public Comments Processing Q) Attn: Docket No. FWS-R6-ES-2016-0042 *lâ·,-'H' Bâ€™™BlO9.Y` U.S. Fish and Wildlife Service . szvs Leesburg Pike Gp ze mw. M T" Falls Church, VA 22041-3803 ( C; â€™~i 7 l S` _ iq Please accept my following comments on Fish and Wildlife Serviceâ€™™s proposal to remove Endangered qcb _ . Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. lab? kv BB? glg? cov ygiew `Fâ€™™ 15 QE dlweoc Qvizzlrf lOQ.:c;/ g remgv-ed EgÃ©kgiig gg Sgqdbg Ad". {Lrg; ggalwvcm ag still urccl -â€™”- vwgxe. Sjyglhfg îâ€™œJ wevvc xi lg Q; ..~\0v~Q :v~Â·\l.P<.Jvâ€™™\2r/xlj apt/{ om);. jg â€™~B\\<JÂ¤=->%v h lmhifaljhi kaeav ygcwg ew [-eg @PE\glvÂ¤Â¤A Â· Pkifgg mgcwgrdcmyg â€™~zÂ·Â·~.dL 2-No Lo uglggitq gm c.Â¤ 0 vypm~` _ s -â€™” . 3% Public Comments Processing Attn: Docket No. FWS-R6â€™”E5-2016-0042 U.S. Fish and Wildlife SenriceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. â€™~ 5 , 1 , l , â€™¢ ` Â· gÂ·».._n :.1...- 1 a V5l â€™¢. Kl O Â· E, .Â· nv â€™~ O & AAA O1 Â· â€™~ â€™” ' lazaxs La 4; .1 .. qquue-. 1 L.: &6Â¤4Y`vuL,â€™~iÂ¤`Ejofi	FWS-R6-ES-2016-0042-5663-A1.pdf	

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This delisting will create an island with delisted bear that will become inbred as wildlife corridors have not been determined and protected from fragmentation, road building and human growth in valleys as is easily seen in the included maps. Until hard management strategies are in place to limit human activity (hunting of Grizzly, road building, climate change, trash storage, grazing, weeds, logging, human development of valleys and a basic understanding that Grizzly bear do not have other places to live) any delisting will be the end of this top predator .	Delisting	5-9-16 To whom this does concern, Please accept these comments on the premature Grizzly bear delisting that is proposed the USFWS. I am very supportive of delisting Grizzly bears if the population, habitat and food sources are secure to allow for populations to reach historic levels and fill historic habitat . As it is now the USFWS and states are satisfied if the population is well below the historic population of 50.000 Grizzly bears. The listing is unwarranted because the population to be unlisted is small and does not include the historic range of the bears. The piecemeal delisting in one small area of the historic range will not truly recover the species. Griz should not be delisted around Yellowstone National Park when Grizzly bear are not present or struggles to survive in 98% of their historic range. Canada has for many years been looked at as a genetic supplier for many species into the US. The population of Grizzly in Canada is also decreasing due to loss of habitat , roads, oil and gas development, mining and hunting, housing, ranching, farming, etc. These are the same pressures and demands that the US puts on historic Grizzly bear habitat. This delisting will create an island with delisted bear that will become inbred as wildlife corridors have not been determined and protected from fragmentation, road building and human growth in valleys as is easily seen in the included maps. Until hard management strategies are in place to limit human activity (hunting of Grizzly, road building, climate change, trash storage, grazing, weeds, logging, human development of valleys and a basic understanding that Grizzly bear do not have other places to live) any delisting will be the end of this top predator . People need to understand that they live in Grizzly bear habitat out of choice. Grizzly bear do not have this choice of where to live . People need to stop being so self-centered and become educated on how people must change their behaviors to accommodate the needs of Grizzly bear to survive in the long term. The USFWS needs to take on this challenge to educate people on the needs of Grizzly bears and actions that are required to enhance and enlarge places that grizzly bear can live in safety . Hunting: The hunting of Grizzly bear is unacceptable for any reason. The Grizzly bear need to have the same protections as Bald eagles where the eagles are delisted and people cannot hunt them. The states protection of Grizzly bear did not work in the past and will not work in the future without mandates from the USFWS that any future delisting will not allow for hunting until the population reestablishes historic populations of 50,000. A population of 600 Griz is too small to be a viable population. I doubt that the USFWS would consider at a population of 600 humans in the greater Yellowstone as viable if there were only 1200 ,+/-more humans in the lower 48 states. The reason a hunting ban is imperative is due to listening to a Montana Fish Wildlife and Parks employee saying “that deer populations are increasing in Montana and we hunt them. And the Grizzly bear will do fine hunting them too .” The mindset that Grizzly bear are like deer is ludicrous. Also whitetail and muley deer populations are doing fine in cities, but not so well in most of Montana. Blue tongue disease and loss of habitat are harming deer populations. Fish Wild and Parks treats predators differently than ungulates. If populations of wolves are not reduced to “acceptable” levels, the hunting season is increased and new hunting methods are allowed. This includes trapping, increase in numbers of wolves allowed by one hunter to take, silencers, etc. This is not done with deer and elk. FWP and federal trappers do not go out and slaughter a herd of elk or deer with aircraft because hunting targets were not met, they were a threat to cattle or they were too close to my cows. I fear tha t Griz will be treated as wolves since 600 bears is our target population to keep the Griz off the ESA and this is our target. We will allow for hunting, bear baiting, etc to keep bear at this population at all costs. Delisting of wolves has not gone so well in Wyoming and the mid-west, at least according to federal judges. Federal funding for Grizzly population surveys will stop after 5 years. Will it then be left up to the states to monitor Grizzly Bear? Is there a funding mandate placed on the states to monitor the Grizzly populations? Economics: There has been new economic information on the value of Grizzly bears for tourism. The study showed that Grizzly bear are an economic driver for tourism. Hunting Griz will hopefully create tourism boycotts. Disease: Due to the small population of grizzly bear, islands of bear habitat and global warming, it is possible that the Yellowstone population could be decimated with a disease that the bear would never recover from. 700 bear are too small of a population for long term survival. How does delisting now respond to issues of disease? Isolated populations: Unfortunately politics punched a hole in the ESA when Senator Testor put a rider on wolf delisting. Up until that point, whole populations needed to be at least stable growing throughout species historic range before delisting could happen. The delisting of pockets of Griz when the bear are not established in their historic range is shortsighted. How are the bear doing in the Cabinet Yaak. How will the bear do around Glacier long term when one looks at human development? What is the acceptable population numbers and habitat that the USFWS has determined for Griz to be delisted in the lower 48 states? Look at all of the human growth in the Madison, Gallatin and Paradise , Boulder and Redlodge Valleys. How does this growth allow for Griz to re-inhabit historic ranges? Food sources: The diet of Griz around Yellowstone NP has changed drastically. The bear have lost whitebark pine, cutthroat trout and moths as a major high nutrient food source. As a result their diet has needed to change. How will delisting these bear now protect future bear generations if they lose other food sources? Is there enough habitat and human tolerance for Griz that will allow for Griz to use new habitat for new food sources? How will delisting effect Griz if the bear take cattle on federal grazing leases? New threats: The new threats come from the same old major threat-humans. Without the ESA protections it will be difficult for policies to be put in place quickly to protect Griz. Look how long it has taken to establish viable Bull trout critical habitat? Habitat loss: Growth around national parks and wilderness areas are the fastest growing areas in the west. People want to live in nice places. Unfortunately griz do not have the latitude or ability to move to many places in the west and survive. They have been pushed in the past to places that people did not want to live. They were plains animals. I have included maps of population growth in the Flathead from 1970-2010 and these maps clearly show habitat loss. If federal lands are transferred to the states as some people want, how will this political action affect the viability of Griz?? Without ESA protections many shortsighted land management decisions will be made that will reduce habitat sui table for Grizzly bear. In the past even in the 1970s when food sources were bad for Grizzly bear, they could go down in the valleys and find food. With the conversion of the vallevs to housing and ranching the bear have lost this source of food in times of drought. As global warming continues. where is the habitat	FWS-R6-ES-2016-0042-5183-A1.docx	

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		What the conversion of the valleys to housing and ranching the bear have lost the source of food in times of drought. No greater farming continues, there is the need to set aside b the states to accommodate this top predator? I am amazed at the growth of humans and change o f wildlife habitat to human dominated habitat from highway building, human housing development, roads from log ging, weeds and the shorter winters in Idaho, Montana and Wyoming since the 1970s. When I project this growth forward, I really do not know where the griz will live in the future. Look at the map of the Flathead in 1970 and then 2010. The growth is impossible to ignore. This growth has happened throughout Griz habitat. The bear was listed in 1975 and look at the loss of habitat and how Montana finally was forced to stop hunting the bear in 1980? Now you want to leave it to the states to manage Grizzly bear ? Griz are not deer. Global warming: From 1978- 2000 there were over 30 more frost free days in Montana. It does not get down to -50F anymore. Forest fires and lower and less snow pack will be more common. How does delisting the bear now protect them in the future as their present habitat will be unrecognizable in 20-30 years? Hunting: There is no rational reason the hunt Griz again. I have hunted in the past and do support hunting. But not for Grizzly bear. They reproduce too slowly and there are too many human caused threats present and unforeseen future ones to allow for the states to hunt them. Look at Wyoming â€™s plan to only allow wolves in a small part of the state. Look at Idaho that says they are doing elk studies in the Frank Church River of no Return Wilderness with helicopters and it turns out it was only to hunt wolves? Look at Montana where wolf hunting rules are being relaxed and new manners of killing them is looked at ev ery legislative session? I do not trust these states to wisely manage Griz. Past hunting got the bear listed. While the public in general wants top predators on the landscape, local ranchers and hunters do not like top predators. Ranchers with federal grazing leases hate predators and will shoot more of them without federal protections. What will happen when a hunter wounds a bear and the bear gets pissed and starts killing people? Bear are not deer. There is no reason to hunt bear. It will encourage poaching, allow for ranchers and farmers to shoot bear on sight and unfortunately lead to the bearâ€™s eminent demise. Please do the right thing for future generations and stop the delisting of Grizzly bear until there are stable populations in the Frank Church and Selway-Bitterroot Wilderness Areas, the CM Russel, Washington, Idaho, Oregon and California(the bear is on their state flag). As you know top predators improve habitat for all species. Including humans. The piecemeal approach to Griz delisting is short sighted and will fail the species that the ESA was designed to help. Thanks for your time , Stephen Braun PO Box 5614 Whitefish, MT		
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		t RECEIVED Grizzly Bear Delisting Proposal Attn: MAY 1 1 Zum Docket no. FWS-R6-ES 2015-0042 D _ US F&WS, MS: BPAC 5275 Leesburg Pike Falls Church, VA 22041-3803 Comment by: Don Bachman â€ 3910 Sourdough Rd., Bozeman, MT 59715 I am opposed to the Grizzly Bear Delisting Proposal at this time. My first awareness of the grizzly bear came from growing up in California when my father, who worked for the United States Forest Service, explained the bear on the state flag had all been shot and trapped to death well before I was born, in 1938. My next consideration of that fact came in 1979 while I was working in the San Juan Mountains of Colorado when the last grizzly in that state was killed during a hunter confrontation. In 1980 while spending 3 weeks in the Alaskan bush I constantly carried a gun for protection from bears. That precaution was maybe necessary then, but unneeded. I came to live in Bozeman in 1989, and since have hiked, camped and worked in occupied grizzly bear habitat and have always carried bear spray since it has become available. I am aware of the history of grizzly bear occupancy in the Greater Yellowstone Ecosystem and am very pleased with the recovery progress made under the protection of the endangered species act. My wife and I are always thrilled (and cautious) when we see signs of the bear through tracks, diggings, claw marks and scat. ...and of course the objects of bearjams. I have attended meetings of the Interagency Grizzly Bear Committee and the recent hearing held by the Fish and Wildlife Service in Bozeman. I have read some background material, including the Executive Summary of the 2016 Conservation Strategy on the proposal and have been informed on the issue from many other readily available sources. The stated goal		

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If delisting is accomplished as in 2008, we can expect greater mortality from hunter-related incidents as bears are drawn to elk carcasses or disturbed, and hunters can and will, shoot bears with far fewer, or no state enforced penalties.	Delisting	of delisting is to shift from managing for recovery to one of conservation. This is admirable, but is flawed under the strategy developed. The matter of genetic viability is virtually dismissed in the absence of established connectivity and is solved by a vague reintroduction program. This involves bringing male bears into the Primary Conservation Area (PCA) from other populations for genetic introduction purposes. Not discussed in the plan is the potential for breeding competition with resident males or the potential for incidental or hunt mortality of these bears, especially if they "strai/â€™ into the Demographic Monitoring Area (DMA). Connectivity corridors provide not only for exiting bears which can ultimately share their genetic material, but incoming bears from the Northern Continental Divide Ecosystem (NCDE) naturally seeking out the Greater Yellowstone Ecosystem. In the absence of hunting and incidental mortality, these are the individual bears that should provide the diversity sought after and necessary for recovery. The principal impediment to migratory connectivity is human-caused mortality associated with livestock grazing and elk hunting. There is evidence that bear conflicts and mortality have occurred in both the Gravelly and Centennial ranges. The situation in the Wind Rivers, Wyoming and Salt River Ranges, could be similar. I suspect that livestock allotment priorities of the US Forest Service serve as management priority impediments to grizzly bear range, and thus, population expansion and stability. The matter of connectivity and wildlife conflicts should be a part of National Environmental Protection Act (NEPA) examination for all public land grazing allotment suitability examinations. These reviews should be conducted for every allotment in the Greater Yellowstone Ecosystem, prior to delisting, and the matter of conflict examined. _ _ _ _ _ 1 1-1 _ n1 1111*1 _ _ 1 â€¢ 11 1. 1 - â€™ 1*-* 511111* 1 111 1- 1-1 t1 1 _ L-- _ J. 1 1 1 _ 11.1 0 '111Â·Â· 11 "" 1:;; 1 11 1. 1* 1111 .1 '. 1 Â» 1 1 1 â€™ 1* .. {1 â€™ 1'1â€™ _ 1 Â· ' ' i"! all 1 ' 111 â€™ 1* 1. 11 1711 ' ' ' 1 " ~. ' 1. 1 _ *' g 1 11. 1 Â» 1 1 1 .. 11L; .1 " = 1. Â· â€™vÂ· 1 1 Â· 1 11 * 11 . 1 11 1 VI! 1 1 â€™ 1 "" 1Â· 11 1 1 1 11 . . 1 1. 11 '1. Â·. 1 1 1. . F11 1 E. ' -1 1. _1." 1 :1 â€™ 1 ... 17 1 1 1 1 _1Â· 1 Â· \$ 1 _â€¢ 1 *1 ' 11 1117 11 1 Â· 1. , 11 1 - Â· Â· ' . . 1 11. - . . . ` 1 â€™ Â· â€™ 1 1, 1n ' , 1 1, -, â€™ 1 11-   ' ' ' â€™ .. ' 1 1 1 1 1 _ 1 1 1 1 Â· 11. 2 - 1 1 11* . Â· â€™ Â· Â· 1 1 1 1 1 1 . 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If delisting is accomplished as in 2008, we can expect greater mortality from hunter-related incidents as bears are drawn to elk carcasses or disturbed, and hunters can and will, shoot bears with far fewer, or no state enforced penalties. The issue of white bark pine mortality, cut throat trout decline and pesticide-targeted moth population sustainability is showing that changing feeding habits can result in more conflicts due to shifting diet preference. This places bears at even greater even greater risk than only a few years back. The funding of the extensive monitoring plan must be considered and guaranteed. This is a tough element to contend with at the outset of a program, but funding must be assured if this proposal is to ultimately be adopted. Perhaps some sort of trust could be established insure continued federal oversight. The conservation strategy places future management the PCA for the Yellowstone grizzly bear population in the hands of the adjacent states. Montana, Idaho and Wyoming exercise varying degrees of cultural and political considerations when directed to manage this nationally-important population of a scarce mammal which has been extirpated from the vast majority of its range. During this comment period we are witnessing a range of public attitude toward this Threatened animal. The Federal Fish and Wildlife Service and its staff must consider the national public trust responsibilities it shares with other federal land management agencies and tribes in the consideration of this proposal, and deny delisting at this time. 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Â§_â€¢cÂ»]~.Â»h nr iw VI' â€™ fH2tâ€¢câ€¢c-' if 912 VHMI:1 Hu .â€¢cÂ·* â€™1.Â·lZl;â€¢cCÂ»4LZÂ·c W IH RP" Fi .Â» â€™*Hâ€™W 1""Â»;â€¢œ'ri* _ *1: â€™U*T Zi'*Fâ€™W2"\$I" V ""Â·1 " JH 1** i **Â·*W"" w _ _ l_ P, _ _ >_ Y > _ pq, PD [1*; "\â€¢c- I J 'Â· i; Â·-- ~â€¢c v" str ml L[â€¢c lajh nil T l'-; .a.â,-"\$ L9);. nl 1T H * i 1 xw "Â° 'Â·:rÂ· Â»Â·â€¢cÂ·Â»Â·c:Â·c- ** *â€™*â€¢œvÂ»* <~"i".Â» F": 3 y Â·Â· Â»Â·- â€¢œ'Â·ii Â·Â· _Â·.Â»* MF ...Â»aÂ»1-Â·c. _Â·1.'_lâ€™r;Â» ~Â°a!Y1T!if mh cweÂ·JtÂ». i.Â»1l J1 __1â€™Â»3. i Â»Â» ina iii l il'] im ii Â»_ AMLEWH, ;I E â€¢c{ -- dr- Ilgums Mlgfl. l 4 Qu l'Â·â€¢cÂ· _ * jp H" NG Ti â€¢c~ {PEPI-ZIZIN :lÂ§â€¢c [61 IM-?.} V J1 'W fÂ· pi 4, Â»â€¢c# ygygpuf W; i ig { gwyi . \Â£ng;;Â©4)? Â»Â»Â·Â·Â»gfw?{ win; my znhpg-_ _ J A YÂ°Q 0.Â». 'Â» _ ~ "?\$`Â» _ ( - 1 ai lt .il ie "â€™ 'ilÂ©al TI W J â€™ _ 16 un` Â· \ =` l	FWS-R6-ES-2016-0042-5677-A1.pdf	

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Removing T&E protection and placing it in the hands of the three states of Idaho, Montana , and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered.	Delisting	As a resident of the state of Idaho, I know first hand Idaho state agencies do not have the moral gumption or leadership to “manage” grizzly bears. The Idaho Department of Fish and Game has proven this with their killing programs associated with wolves. They have also proven their inability to prosecute individuals who kills species protected under the Endangered Species Act. Allowing state agencies to care for our wildlife particularly in Montana, Idaho, and Wyoming has proven fatal and devastating to the health of ecosystems . I concur with the following statement created by the Park County Environmental Council. On March 11, 2016 the US Fish and Wildlife released a proposed rule in the Federal Register (vol. 81, No. 48 , pp. 13174 - 13227) for, Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears From the Federal List of Endangered and Threatened Wildlife; Proposed Rule. Herein referred to as The Rule. Dr. Christopher Servheen, Grizzly Bear Recovery Coordinator, U.S. Fish and Wildlife Service is lead author and primary contact for The Rule . The Interagency Grizzly Bear Study Team (IGBST) is the lead organization responsible for research and monitoring efforts on grizzly bears in the Greater Yellowstone Ecosystem (GYE). There is a public comment period until May 10, 2016. The following are major points of concern identified with this proposed delisting action. Excessive, unsustainable mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection of the Threatened and Endangered Species act. Removing T&E protection and placing it in the hands of the three states of Idaho, Montana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Climate Change Impacts The impact of climate change on Yellowstone's grizzlies is summarily dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the blithe statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high-elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has . Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). An alternative , and more reasonable, hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement for "best science" as required by law. Genetic viability The Greater Yellowstone grizzly population is isolated from all other grizzly populations (pp . 1319 0-13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly population is seriously flawed and violates the requisite principle of "Best Science." Population Estimates Accurately estimating the number of bears in a large, rugged area like the Greater Yellowstone	FWS-R6-ES-2016-0042-5313-A1.docx	

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		the requisite principle of “best science.” Population estimates – “Accurately estimating the number of bears in a large, rugged area like the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review. Scientific Accountability The IGBST has been less than transparent about making taxpayer funded data (which they have maintained an exclusive monopoly) available for scrutiny by the larger scientific community. All raw data on grizzly bears collected by government agencies should be made available to independent scientists. In view of the wide disagreement about delisting decisions, the USFWS should establish a review panel of independent, academically qualified scientists who are not involved in current grizzly bear research in the GYE. I also take issue with delisting the grizzly bear and opening up its population to hunting pressures. Grizzly bears are NOT recovered. Their gestation cycle is slow. Viable population numbers will be impossible to maintain with open season hunting. The vitriolic hate for grizzly bears and fear alone threaten the species. I have hopes that one day, grizzly bears will eventually repopulate the Selway Bitterroot Wilderness in north-central Idaho. This will never be possible if the State of Idaho is left to care for our bears. People will shoot the bears all in the name of generating revenues for the State of Idaho.		
The protection of the Endangered Species list was a major factor preventing the great bear’s extinction. Removing that protection and allowing the bear to be the target of trophy hunters will only guarantee its path to turn once again towards a diminished population, even more incomplete ecosystems, and eventual extinction of the bear.	Delisting	As a Montana resident since 1981, I’ve been privileged to observe and experience extraordinary wildlands and wildlife. As a backcountry hiking guide in Yellowstone National Park for many summers, I was further encouraged to explore and learn more of wildlands and wildlife. Because I'm temporarily out-of-state for an extended period, I only learned two days ago of the USFWS proposal to remove the grizzly bear from the US Endangered Species list- and am shocked. Grizzlies aren't "recovered". There are only enough of them for us humans not in the wildlife professions to have occasional glimpses and feel wonder and blessedness when we are fortunate enough to be aware of the presence of these magnificent beings. I strongly urge you to continue the status of the grizzly bear as an endangered species. Bear numbers are already faltering thanks to major losses of several of the bear’s food sources. White bark pine seeds, huckleberries and cutthroat trout (now no longer spawning in Yellowstone Lake) are in dramatic decline thanks to climate change and other factors. Declines are also predicted in army cutworm moths, another important dietary element for grizzlies, and are already observed in elk and bison populations in Yellowstone, thereby causing grizzlies to prey on domestic livestock and resulting in conflict with humans and increased bear mortality. Bear reproductive success has already declined as a cumulative effect due many interrelated factors – which are ultimately traceable back to climate change as well as human activities. Bears are naturally slow to replace their population – and are even slower thanks to humans’ activities, which makes their status as an Endangered Species even more necessary. The protection of the Endangered Species list was a major factor preventing the great bear’s extinction. Removing that protection and allowing the bear to be the target of trophy hunters will only guarantee its path to turn once again towards a diminished population, even more incomplete ecosystems, and eventual extinction of the bear. @\jE2t'Ä©lmcmeivvyj awaylm Â·Ä·Z25-34590 +r@l}v3e.tâ€ˆgâ€ˆ”l> @ l, WM	FWS-R6-ES-2016-0042-5699-A1.pdf	

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Example: Look what happened to the wolf population. Very diminished and depleted! My main concern is how quickly the population of the grizzly bears will go down dramatically if not protected by the endangered species act. The grizzly bears would be over hunted and out of the park not respected to exist.	Delisting	U.S. Fish and Wildlife Service Nlountaln-Prairie Region Â·i i ___ is _' _ 1;; Yellowstone Grizzl Bear Y if -' â€~_ et-n ;. > Po pu l atl on P ro posed Del 1st1 n g Comment Form The U.S. Fish and Wildlife Service (Service) is accepting written comments on the Greater Yellowstone Ecosystem grizzly bear population proposed delisting rule, the draft supplement to the 1993 Grizzly Bear Recovery Plan for the Yellowstone grizzly bear population and the draft 2016 Conseniation Strategy. The recovery of the Yellowstone grizzly bear population serves as a remarkable Endangered Species Act success story. It is the result of strong partnerships among the Service, federal and state agencies, tribes and other partners. Yellowstone grizzly bear numbers have rebounded from as few as 136 bears when listed in 1975 to an estimated population of more than 700 today. There is now a sustainable and resilient population that occupies the entire available habâ€™tat. The population is at or near the ecosystemâ€™s l0ngÂ-term carrying capacity. To comment, return this form by mail to the address on the reverse side. Fold this form on the lines with the return address showing, tape it closed, affix a stamp, and mail. You may attach additional pages. Comments may also be submitted for Docket No. FWS-R6-ES-2016-0042 via www.regulatiOns.gov. For e the most effective, the Service suggests the following guidelines: â€¢ Be specific. Give defined reasons, not broad statements, 'n' . _ limi? 1"II2UI6 â€¢ Share site-specific observations, data, or knowledge. â€¢ Detail important environmental and community factorQ;;Â§{;rÂ°bPÂ°yâ€¢ â€¢ Be timely. Comments are requested by May 10, 2016 to be considered in the final rule. â€¢ This is not a voting process. Petition signatures typically only express an opinion, which is not helpful in our decision making. _lâ€™isse_!s.;Q.l=; cl <Â·i 1- -- ID.Q.1â€œÂ·1M..tl_@o.uc.e_ -..Â·.. sllc;ea.c.e;1.c:> t'L}-O.Illt:L.IE ... ii I F ai {1 T QQ Q "â€™n.=. r TED Â·" e eite ci ized e e { esi- S . _ r V ll" ., \ V O ..csl.;_1_% _..l.l_sL a re sw â€” .l.;~s.eai;â€”.. You ma ' S ' â€™™ T ` y i ert additional pages. â€”vâ€~â€™”â€™ KNOLO Eiidlf Su-pal ,, O >â€™ (7 QJ Please provide your contactInformation. y! O Om and Q Q INV! bea},. jJ,Â»-6;*1 \ \$2-* Before Including your address, phone number, e-rnaila dress, or other personal Id ntlfyingInfonnation in your comment, you should b aware pd P li.- 5 L B (Jthat your entire comment â€™Including your personal identifying Informatl0nâ€™may be made publicly available at any time. While you may ask us In your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. Â§ EEE .lfi.I } U _ " - Q T- .. _ _ Q. ` name . up ```` "" . N ~ .Â·2cil_Ov.e;e..e.e.c>.c2ic..-Ti.`> E.-..lzt. MAIL mc aD0aE.SSM, . lb L me Eninsrafc zIncooc "" ``V`` _ ` I Thank you for your interest and participation!is	FWS-R6-ES-2016-0042-5712-A1.pdf	
The U.S.F.W.S. Plan FAILS to preserve the progress made to ensure the bears recovery for starters! Our wildlife needs us to provide the necessary habitat, and readily and stringently enforced regulations to protect it, We need FEDERAL Control!	Delisting	I am writing to express my comment on the proposed eminent delisting ofthe grizzlies in the Greater Yellowstone/Yellowstone Park Area, No! A thousand times NO! The U.S.F.W.S. Plan FAILS to preserve the progress made to ensure the bears recovery for starters! Our wildlife needs us to provide the necessary habitat, and readily and stringently enforced regulations to protect it, We need FEDERAL Control! This ofcourse needs to include the same protection for the wolves, the mountain lions, the bobcats, the other bears etc as well as the grizzlies, Our wild lands, our parks etc need to remain fully protected and wild and expanded as necessary to ensure the survival of our wildlife. Once too much development occurs too close to these lands-this wildness and this wildemess is threatened and then lost. Wildlife species search for food, raise and fiercely protect their young, live in varying species-specific networks,like the human species in its way. They are trying to survive just like us, but have fewer options with which to do so, They have their own highly functional and appropriate places in the ecosystem. It is NOT the province of special interest groups like the hunters,real estate entrepreneurs or ranchers etc to interfere with the safety and survival of our wildlife, This is a hilly inappropriate domain for any market interest, trappers, trophy hunters or â€œsportsmen". We are indeed fortunate to be living in a time when we have this opportunity to enjoy, to experience to contemplate the awe of this incredible web of life-the interconnectedness of all things and our belonging to this profound network of life, This is nourishment for the soul. Therefore, it is incumbent upon us as the potentially most dangerous predator of all to use all of our education, understanding, respect. appreciation, science,collaborative powers and most of all compassion to ensure this responsible stewardship! I along withthe maiority of most Americans want to save endangered species and keep our bedrock wildlife protection law,The Endangered Species Act firmly intact! Thank you for your attention in this matter.	FWS-R6-ES-2016-0042-5718-A1.pdf	

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USFWS cannot delist a specific population segment. Civil Action No. 13-186 (BAH). The proposal violates this.	Distinct Population Segment	YP'ziÃ©science for a changing world Fomxcmc Bumvion or Noam AMuucAu Bums David J. Mattson P.O. Box 5614, BLD 24 Southwest Biological Science Center Flagstaff, AZ 86011-5614 Colorado Plateau Research Station Phone: 928-556-7466 x 245 Northern Arizona University Email: David Mattson@usgs.gov Predation on Land-Dwelling Prey Even though all three North American bear species can be predators, the grizzly bear is more likely to kill larger terrestrial prey; either because of opportunity (compared to polar bears) or aptitude (compared to black bears). An adult grizzly is large enough to kill most adult ungulates, and equipped with claws, teeth, and power sufficient to deliver a killing blow. I\ eat's ready digestibility also means that the typical bear will reap considerable rewards from predation. Bears locate larger land-dwelling prey, such as deer, elk, and moose, by a variety of methods and with varied intent. A certain number of encounters with potential prey are strictly by chance, apparently without deliberate stalk or search. This is typified by one incident where two grizzlies approached some elk behind a blind rise, without either species being aware of the other's presence. However, as soon as the elk came into sight, one of the bears lunged after them, but without success. This unfruitful result probably characterizes the vast majority of these chance encounters, however there are enough recorded kills in rolling terrain or otherwise visually opaque conditions to suggest occasional success under similar circumstances. On the other hand, the majority of observations suggest that both black and grizzly bears most often encounter their prey either after a deliberate search, characterized by movement in the direction of the hoped-for kill, or, with even greater forethought, by putting themselves in areas with concentrations of vulnerable prey. Elk and caribou calving grounds or traditional caribou river crossings are good examples of such areas where, either because of extreme young age, the preoccupations of birth, or the mass confusion of swimming animals, otherwise elusive ungulates become easy prey. This is most dramatically borne out by several graphic descriptions of observers such as Adolf I\ urie, Harry Reynolds, Kerry Gunther, and Steve and I\ arilyn French, of contemporaneous pursuits, kills, and confrontations by grizzlies concentrated on calving grounds in Alaska and Wyoming. Bears clearly use all of their senses to track down prey. However, most observations suggest a prominent role for olfactory and audio cues. Bears have often been observed following scent trails associated with potential prey, sometimes for miles, or more convincingly, been seen killing calves at the culmination of a complex search mostly with nose to the ground. There are other phenomena that argue anecdotally for the prominence of hearing in tracking down meat. A number of hunters bugling for elk have surprised themselves by soliciting the apparently predatory interest of a grizzly bear. Concordantly, there is a consistently observed tendency world-wide for increased bear predation on both bull elk and bull moose during their fall ruts. Bears also seem to be attracted to the sound of gun-fire during the hunting season, one can only suppose with the intent of scavenging the gut pile and other remains of a hunter's kill. Although this likely orientation towards sound has not been conclusively demonstrated, it remains an intriguing possibility worthy of further study. Bears can chase down prey in open country, and are more successful at this tactic after separating a young calf from a cow-calf herd. Capture usually occurs after the pursuing bear cuts the corner on a fleeing calf that has been foolish enough to turn. However, most successful bear predations are not the result of long pursuits, but rather the result of a short-range rush either from ambush or after a stalk. Given the relative slowness of bears, at least compared to most wild ungulates, there is a distanceForaging Behavior ofBears . Mattson 2 at which this rush is more likely to be successful or, if not, then terminated. A number of records by different observers in different areas suggest that this "optimal" distance is around 20-50 m. Without the aid of mitigating conditions or tactics, it would be difficult for a bear to get this close to a reasonably alert and healthy ungulate, and so it should be no surprise that most kills are associated either with cover, conditions that hinder prey mobility, or the afflictions of exhaustion, disease, or raging sexual hormones in their prey. Thus, many documented predations have been in or near the edge of willow thickets and dense timber, often near running water; presumably under conditions that facilitate the unobserved approach of a predatory bear. Other predations occur on forest game trails, often as the prey negotiates deadfall or a small draw; under conditions where temporary imbalance or distraction would favor a successful ambush. Otherwise, bear researchers throughout the northern hemisphere have noted the remarkable success of bears preying upon winter-weakened ungulates in spring snow conditions. Surface crusts form that can support the weight of a broad-footed bear but not a larger-bodied ungulate such as an elk, moose, or muskox. Under these conditions the delivery of a killing bite is more often a constraint than over-taking the prey. Similarly, exhausted and/or hormonally-deluded bulls seem to make relatively easy bear prey during and after the fall ruts. One extraordinary story from Siberia recounts a brown bear that lured a rutting bull moose into a willow thicket by imitating the bull's mating roar. Grizzly bears kill land-dwelling prey primarily one of two ways. I\ lost often they maneuver to approach over the back, after which they grab the animal around the rib-cage and, if successful, deliver a killing bite to the back of the neck or skull. A bite to the small of the back may be a prelude to this finishing move, or an animal that escapes the first attempted neck bite may be severely wounded on the flanks by the bear's claws as they are disengaged from their hold. An approach from the rear is also the logical consequence of a chase, and on occasion the bear may use its weight to collapse the hind- quarters of an animal that has just been caught. The next most common kill technique involves a bite to the nose and face that at least paralyzes and possibly kills the animal. Either way, the animal does not offer subsequent resistance. Interestingly, there are only a few reports of bears delivering killing or debilitating blows with their paws, and in most cases their paws come into play for such things as pinning down a newly-captured calf or grasping larger prey to facilitate delivery of a killing bite. Bears are able to consume between 12 and 40 kg of fresh meat in a day. However,	FWS-R6-ES-2016-0042-0513-A3.pdf	

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		consumption is not indiscriminate and typically reflects marked preference for some carcass parts. Almost universally, the most favored or at least first eaten portion of a female is the udder. After that, most bears eat the brisket and adjacent rib meat or the meaty proximal part of the front legs. I\lost carcasses are cleanly eviscerated soon after they are killed or found by a bear, with the heart, liver, and lungs selected for priority consumption. The skin, hair, rumen, and stomach are the most consistently unused soft parts of a carcass. In fact, a more-or-less neatly peeled off hide is one of the more diagnostic signatures of bear involvement. Bears are also one of the few consumers that can readily crack the major leg bones of a larger ungulate in pursuit of the marrow. Some bears even get into the habit of cracking the skull so that they can consume the brains. There are other features that distinguish carcass use by grizzly bears. If there are enough edibles to warrant the investment, a bear will typically bury the entire carcass or selected parts of it by scraping adjacent soil and litter over the tidbit with its front paws. Presumably this inhibits decomposition and the dissemination of scent that might attract competitors. As further sign of ownership, you might even find a bear sprawled directly on top of a carcass, attempting to rest while at the same time prevent pilfering by other scavengers. A bear may also move an intact or even partly consumed carcass to a spot more to its liking. If the carcass is not fresh, a drag trail of shed ungulate hair will connect the new carcass location with the rumen contents left at the original site of death. In addition, there are often bear beds nearby and a bear trail leading to the nearest available water (an apparent necessity when consuming such a protein-rich diet). As a final note on this type of predation - grizzlies exhibit marked preference for different sizes and species of ungulates. They are least likely to attack very large herd-dwelling animals that rely upon aggression for predator defense, epitomized by bison. Among the larger ungulates, they seem most likely to attack moose, presumably because of a solitary forest-dwelling existence that lends itself to ambush. However, within any given medium- to large-bodied prey species, bears preferentially prey upon young animals, especially the highly vulnerable neonates. On the other hand, although they are not		
		US Fish & Wildlife Service COMMENT on draft proposal to Delist the Yellowstone Grizzly I am a Wyoming native who lives in Cody , 50 miles from Yellowstone Park on the edge of the Greater Yellowstone Ecosystem. Much of my life has been spent in the backcountry of the Absaroka Range in prime grizzly habitat, and countless hours in Yellowstone Park. I reckon I have had around 200 encounters with and close range sightings of Grizzly bears in my lifetime, all good. The Great Bear is a topic of major concern in my region. I've engaged the state and federal agencies on grizzlies ands other issues for over 40 years. I feel qualified to give a considered opinion on Grizzly management. I am strongly opposed to the Delisting of the so-called Yellowstone Grizzly Bear. The proposal by USFWS to Delist the Grizzly and give management over to the states of Wyoming, Montana , and Idaho is flawed. The only reasons that justify grizzly delisting are political. The reasons against delisting are expressions of accumulated science, the ecology and range management aspects, habitat concerns , and the appalling prospect of allowing the State game agencies to " manage" grizzly bears given their track record and narrow views; e. g. the Wyoming Game and Fish draft plan for management falls apart if the goal is to assure a healthy bear population in the far future. Neither Fish & Wildlife nor Wyo Game and Fish have produced a plan to guarantee the Yellowstone Grizzly's sustainability based on the needs of the bears. All plans put forth are People Plans , not Bear Plans. Best Available Politics, not science , not genuine wildlife conservation. After 40 years and \$ 40 million in research and bear management , I expected a delisting plan that actually helped the bears. Instead we get proposals that cow-tow to special interests and decidedly non-wildlife priorities. It is disappointing that delisting looks like this. We can do better. For an animal that once ranged from Hudson Bay in Canada's northeast , all the way to the Pacific Ocean coast , and south as far as Guadalajara Mexico , the proposal to sustain the Grizzly on an island with a hard population ceiling (700 bears) and a hard population floor (500 bears) with nearly zero opportunity for that island population to expand and interchange with other		

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Besides, the Yellowstone Grizzly is NOT a distinct population or even a subspecie of Ursus arctos . That is a deceit; a biological accounting trick. Sentencing the Grizzly to remain behind an artificial map line as a Distinct Population in a Demographic Monitoring Area is a huge falsehood.	Distinct Population Segment	grizzlies in the Rocky Mountains is patently absurd. I seem to recall back a couple decades ago that USFWS/ IGBST said they would endevaour to bring in 'outside' grizzly bears to augment the GYE gene pool. I feel strongly that when the Grizzly was originally listed as Threatened under the ESA back in 1975 , the starting population of (maybe) 130 grizzlies then was not sufficient for genetic viability. I still feel that way , and scientists have not convinced me otherwise. Talk is cheap. Mitochondrial DNA Analyses is a young science and not the USFWS' strongest suit. Forty years is far too short of a genetic interval to be manufacturing conclusions. Besides, the Yellowstone Grizzly is NOT a distinct population or even a subspecie of Ursus arctos . That is a deceit; a biological accounting trick. Sentencing the Grizzly to remain behind an artificial map line as a Distinct Population in a Demographic Monitoring Area is a huge falsehood. Surely Fish and Wildlife knows that Grizzlies are well suited to occupation of many areas of their former ranges and domains in the West . There is a lot of suitable habitat. Why doesn't USFWS have a mechanism to connect Yellowstone bears to the huge Selway-Bitterroot Wilderness of north central Idaho ? There should be provisions for safe passage in both directions from the Greater Yellowstone Ecosystem (GYE) to the Selway via the Red Rock Lakes wildlife refuge corridor. Bears should also be allowed to move up the Continental Divide north and west of Yellowstone towards Canada. The agency should also translocate GYE grizzlies to the San Juan Mountains of Colorado, and areas in northwest Colorado. The Uintah Mountains in northeast Utah should be considered for grizzly repopulation. It is disgusting to me personally that neither Grizzlies nor Grey Wolves are allowed to expand into other areas of my Wyoming without becoming a target for a rifle. The southern Wind River Mountains and Wyoming-Salt River Range deserve bears. A case could be made for the Pryor Mountains on the Montana-Wyoming border and the northern end of the adjacent Big Horn Mountains as new grizzly range. The Crow Tribe has said as much. You should listen to the Tribes on the topic of grizzlies. Frankly , if a Giant Panda bear can be relocated from the bamboo jungles of south China to the National Zoo in Washington D.C. it should be doable to move a grizzly from the North Fork of the Shoshone River at Yellowstone's east gate to the Selway-Bitterroot , a distance of 250 miles by helicopter. In both directions. That the USFWS has not instigated Grizzly Repopulation across the northern Rockies, and the State of Wyoming wants to keep X-numbers of bears inside a Zoo Zone, and not even count any bears outside that Zoo Zone as a component of bear recovery , is a terrible deceit. This one aspect ---lack of landscape expansion opportunities for the Yellowstone bear and lack of genetic connectivity with other bear populations in the Northern Rockies --- is enough to declare Delisting to be null and void. They Yellowstone Grizzly has been branded a Distinct Population Segment strictly for political reasons, and expediency. I reject that. The agency should instead look at the Yellowstone bear both as a sustainable population AND a seed population. Yet Wyoming wants to cull bear numbers to keep them in a Goldilocks gated community of not more than 700 nor less than 500 bears, and that culling will be done by hunting and other human caused mortality , i e. " management actions". Why not relocate ' surplus' bears instead , or if a problem bear raiding the tack shed or apple orchard, put them on unsupervised probation in another state with their electronic GPS necklaces ? Wyoming Game and Fish bear managers have been playing " Musical Bears" for a couple decades now , trapping bears and hauling them to some other release point over the mountain . Sometimes the same bears. Recidivist grizzlies. We have maybe six drop points in all of Wyoming. If we were doing it right, the management agency would relocate bears to 60 drop points across five states. Again , in both directions. Please do allocate the funds to buy a LOT of GPS radio collars. I am not at all opposed to trophy hunting of Grizzlies in Wyoming. I can support that . But only if the agencies agree that expanding and sustaining a growing bear population outside the proposed Grizzly DMA occurs first. We all know that in Wyoming, Grizzly Delisting is a euphemism for Hunting. Fine. So long as all the tools in the management toolbox , not just the .30-06 rifle with 3x-9x scope , are employed across the Big Picture Landscape of Idaho-Montana-Wyoming-Colorado-Utah - and ??? Grizzly Bears are worth far more alive than dead. The proposed delisting plans (state and federal) seem to emphasize more Dead than Alive when it comes to hands-on bear management. It is regrettable the attitude behind that is so baked in to existent wildlife technocrats and bureaucrats, and narrowminded stakeholders. It is almost as bad as the notion that bear biologists and bear managers actually believe they know bears. They...do...not. USFWS and the IGBST cannot justify delisting the Grizzly by saying it has recovered enough to survive the challenges it faces. We all agree there are a good number of bears...600...700...maybe more , maybe less. The problem is the bear's best food supplies in the core area of Yellowstone Park have collapsed...Cutthroat trout and Whitebark pine seeds. The gross supply of ungulate meat is in shorter supply inside Yellowstone as elk numbers decline. Outside the Park in the Absaroka Range alpine scree slopes the Army Cutworm moth larva are diminishing rapidly due to threats from pesticides and the GMO crop cycle in the lowlands and agribusiness areas of the Midwest . Yellowstone grizzly are becoming Absaroka grizzly and preying on more elk calves, and more livestock. Because of all this, the bears are spreading out , and actual bear density is decreasing over units of public lands. What seems like more bears out on the fringe of the GYE and the proposed DMA are bears that are searching further and wider for food sources. Bears have been spreading out since the early 2000's , and the population number probably peaked in about 2006 . The notion advanced by the IGBST that grizzly's " Omnivory " , the ability to eat a wide variety of vegetation in lieu of less animal protein , is a deception. Grizzlies want meat. Plants are a supplement but not a substitute in the bear's preferred diet. Would you as a human omnivore enjoy being forced to eat mostly salads and give up beef, chicken , pork , fish --- your meats ? Having to work harder and further afield for food is a big challenge to grizzlies, but the real drawdown of bears has been human caused mortalities. We've been killing 50 bears a year for some time...an alarmingly high percentage. The Whitebark pine seed crop has been thin ...not for lack of trees , but because of climate changes and the alien exotic blister rust. BEars simply cannot find the quantity of pine nuts they were having 15 years ago, and the situation is getting worse. When all the factors concerning the bear's food supplies start compounding and cascading, the result is bears coming into conflict zones with humans and their guns. The population dynamic of the Yellowstone Grizzly is at a tipping point, just at the time the humans want to ratchet up all the negative mortality factors affecting bears. The Delisting proposals are designed to do one thing well: reduce bear numbers. And that's about all it does. The IGBST has deluded itself into thinking they have succeeded in recovering bears strictly by the numbers , when in fact the bears are in more danger now than they have been at any time since they were listed back in 1975. It's been a mark of shame that the raw data gathered by the IGBST and their tight circle of researchers has not been fully disseminated to qualified third parties for peer review and analysis. The so-called " Best Available Science" produced by Chris Servheen et al and the IGBST has been built to a conclusion with data massaged and computer models tweaked until it all fits the preconceived political outcome of fabricating bear numbers and management scenarios that appear to show a recovered, feisty, expanding bear population. It all borders on fraud. Besides, it's not about bear numbers , it's about bear habitat. And that is the other Achilles Heel of the proposed grizzly delisting proposal and State plans. There is no provision for sustaining critical grizzly bear habitat requirements. Nothing in the proposals will implore the Forest Service, the BLM , or States to manage for bear habitat. Those agencies will automatically without remorse defer their decisions on behalf of special interests and human stakeholders perceptions. The Grizzly can look forward to more habitat fragmentation and	FWS-R6-ES-2016-0042-5487-A1.rtf	

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		decline of lifestyle should delisting proceed as planned. Forty years ago when the bear was listed under the ESA, you would not have been able to find ten scientists anywhere in the USA who would tell us that Global Climate Change would be a serious challenge in decades to come. Fast forward to today , and we cannot find ten scientists who disagree that Global Climate Change is not a force majeure to be reckoned with ...in every location on the planet from below sea level to the crest of the Himalayas, on all continents. The Yellowstone Grizzly is already adversely affected by climate change , and it's not going to get better in the lifetimes of anyone reading this. Which is why strong habitat protections and enforced regulations of landscape scale issues are paramount. Too bad none of that is in the delisting proposal . The Yellowstone Grizzly's survival into the next century depends on us making the right decisions today . The Great Bear must be allowed to disperse into several surrounding states from the Yellowstone core. That dispersion must be both natural , without undue impediments. And where and when necessary we humans must relocate some numbers and demographics of bears further afield and return virile bears to the core to replenish the gene pool. I see little to nothing in the US Fish and Wildlife's intentions or the state of Wyoming's draft grizzly management plan that would guarantee the survival and virility of the Grizzly Bear in the face of the challenges it faces. I see a People Plan and a whole lotta delusional science, and some deleterious agendas at work disguised as " management". What I do not see is a genuine Grizzly bear Recovery Plan going forward that is actually based on bears, as one would think it should be. Therefore, management cannot be turned over to the States, and Fish and Wildlife as stewards of Endangered Species must retool their thinking to produce a Grizzly bear sustainability plan that puts the bears themselves at the top of the priorities. I reject the proposed Grizzly bear Delisting for all these reasons stated here, and more. Sincerely ; Dewey Vanderhoff Cody Wyoming - submitted electronically May 10 , 2016		
Per the announcement, occupied range has more than tripled in size. Local officials say the range is fully occupied and young or transient bears encounter difficulty in establishing their own home ranges.	Factor A	The Fremont County (Idaho) Farm Bureau (FCFB) strongly supports Grizzly bear delisting under Docket No. FWS-R6-ES-2016-0042. The FCFB is one of 37 county Farm Bureaus comprising the Idaho Farm Bureau Federation, whose combined membership is over 73,400 member families throughout the state. FCFB members live on the eastern edge of the Greater Yellowstone Ecosystem (GYE) and are directly impacted by Grizzly bears and the regulations surrounding them. I agree with the Federal Register announcement of March 11; 2016, Grizzly bears in the GYE have reached great enough population numbers to no longer meet the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). Per the announcement, occupied range has more than tripled in size. Local officials say the range is fully occupied and young or transient bears encounter difficulty in establishing their own home ranges. The states of Wyoming, Idaho and Montana requested delisting the GYE Grizzly bear population and are working on post-delisting management plans. FCFB supports these efforts as well as the delisting of the GYE Grizzly bear population. Thank you for the opportunity to express my support for Docket No. FWS-R6-ES-2016- 042. I Li 76 ,7@ Cjghi p lÂ°	FWS-R6-ES-2016-0042-5658-A1.pdf	

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The proposed rule does not even protect grizzlies moving between the parks or grizzlies that may wander out of the park in search of food. Bears trying to disperse would be subject to hunting and removal, making connecting the GYE population with the northern population of bears impossible. Rather than making it harder for the populations to connect, we should redouble our efforts to help GYE grizzlies expand their range to connect with the northern grizzly population.	Factor A	Iâ€™ve been following the debate regarding USFWS proposed rule to delist Greater Yellowstone Ecosystem (GYE) grizzlies. There is so much information documented about the problems with this proposed rule, I wonâ€™t include those details in this letter. By now, you should have received a letter from Jane Goodall, E.O. Wilson and signed by over sixty leading biologists, strongly opposing the delisting of the GYE grizzlies. I urge you to listen to these experts. The plan is premature, fails to address the numerous risks this population will continue to face and does not provide adequate protections to ensure the long-term survival of this iconic species. When I first heard about the delisting - it caught me off guard. Iâ€™ve spent considerable time over the past few years learning about the plight of the elephants in Africa and supporting efforts to protect this incredible animal. I applaud the efforts of the Department of Interior to support conservation in Africa and around the world. But it is troubling to me that while we see the value of preserving the Big 5 in Africa we are at the same time willing to jeopardize our hard fought gains with the GYE grizzly. How can we remove ESA protections and turn management over to the states, who want to immediately begin sport trophy hunting of grizzly bears and who refuse to let grizzly bears access prime, biologically-suitable habitat on federal public lands? The proposed rule does not even protect grizzlies moving between the parks or grizzlies that may wander out of the park in search of food. Bears trying to disperse would be subject to hunting and removal, making connecting the GYE population with the northern population of bears impossible. Rather than making it harder for the populations to connect, we should redouble our efforts to help GYE grizzlies expand their range to connect with the northern grizzly population. Please do not remove the grizzly bears from protections under the ESA.	FWS-R6-ES-2016-0042-5662-A1.pdf	
A corridor, connecting to Grizzly bear populations in Canada, is a far more important priority	Factor A	. Â· ex, Public Comments Processing Attn: Docket No. FWS-R6â€™ES-2015-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. 'Tlâ€™~I@2â€™~E: [5 /\â€™~BsÂxi.uÂ-CQ_;Z Nm Â§iâ€™~Z.."LL;j] . jg] ggg 'P><Â¢2S1' <bl:â€™~Tl:\<E- Ecogsg AN; clout; esswÃ©gg jggit E:] @" Lt. S. ;;;tts>t_Â¢F.Â¢; f[(Â£â€™"i-.. f' f@ 'B=-=Â·=â€™"=â€™" Â©Â©iz. gl \$S71 I~Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. }â€™~Â¢EPÂ¢SÂ£,Qgiu 'I D E.-- br.l'[Z 4;-[5 glu ZLLV gÃ©glg vu ng [Hi guicrnyn} gwrluguygi my mg M0 6 Z; g gy we cr. CONrJÂ£.cTc,0 Âxlr ,l;{&\$;}1l;[EM [C gow gig J5 egg/cg;) , Ai-Jâ€™~O A; ?0@vcNrzvM <rF gÃ©ggf gggc/=t> gf ALwvJE0 IQ ru gz 5-scw/lj â€™" E rrrgggqq ;. 5 r,ggJ Hm L c U; Yifi Q ([546 g Q . gcgccica ll QE BRC-NAA/Â· Nâ,-7~Public Comments Processing Attn: Docket No. FWS-R6-ESâ€™2016-0042 U.S. Fish and Wildlife Service VIS:BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. .. _j l 74/ /114 4iAl AÃ©Ã© Ka, wz. @23- we /44224 x4â€™~ T1; ..1 1. ul, Â·Â· /&Z6Dq zu .4 11 JL.;} A1 Â·Â·Â· AJ r . # i d'/4 7 Â¢ , _ 1 / / Â·Â·â€™~ Â·- I . {J Q,. AQAM.4 _Â·Â· rz, ro i,I v JMX . â€™~ â€™~ ;. new ,.. r' .4*:.; (H A _ M l if ln;Â·Â· â€™~ â€™~ Â© mz /0 l Âx/me H,/1... F A./n. Al _ 1 â€™¢,Â·Â· ,. zi ,Â·Â· mi;; _ ' . rd;? _ Â·Â· Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. l " â€™~ r r 1 l â€™" *4*%/ 14 llÂ· A Â· 5 ' l . , â€™" Â· G, r '	FWS-R6-ES-2016-0042-	

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to allow for a healthy bear population.	Factor A	ipidrll mobil E r' â€™ . A l lj 'YL V pi zazzF, "" JI ...L.' .Â»:id . Lia @% __rw/III' *1 / P IÃ© gtzÃ©gztl~IÃ· iâ€œe` â€™ `~â€™"Ã· ..â€™â€™â€™ iv Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife SenrlceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Serviceâ€™s proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I lgfm gm {he viog ^/L ÂL www Aer 0 t/kskg 5 ok @ ul/All Eg Â· --`[ Avi/\ Qkggg gm; Qwvxeg ln a Ol `kfk â€” LAAAQY -= AA \\A(Â· ;* â€¸ â€™ ' A V\ Q~` Q' Q .i.31,_T Public Comments Processing Attn: Docket No. FWSâ€”R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. ggnii-L\r' l Â· _ Â· Â J â€¸â€™ l V l l i Public Comments Processing Q) Attn: Docket No. FWS-R6-ES-2016-0042 *!â¸,-'H' Bâ€™BI09.Y` U.S. Fish and Wildlife Service . szvs Leesburg Pike Gp ze mw. M T" Falls Church, VA 22041-3803 ( C; â€™i 7 l S` _ iq Please accept my following comments on Fish and Wildlife Serviceâ€™s proposal to remove Endangered qcb _ . Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. lab? kv BB? glg? cov ygiew `Fâ€™ 15 QE dlweoc Qvizzlrf l0Q.:c;/ g remgv-ed EgÃ©kgiig gg Sgqdg Ad". {Lrg; ggalwvcm ag still urccl -â€™"- vwgxe. Sjygllhf igâ€¸J wevvc xi lg Q; ..~\0v~Q :v~Ã·\l.P<.Jvâ€™\`2r/xlj apt/{ om);. jg â€™B\\<JÂ=->%v h lmhifaljhi kaeav ygcwg ew [-eg @PE\glvÂÂA Â· Pkifgg mgcwgrdcm yg â€™zÃ·Â~.dL 2-No Lo uglggitq gm c.Â 0 vypm~~ _ s -â€™ . 3% Public Comments Processing Attn: Docket No. FWS-R6â€”E5-2016-0042 U.S. Fish and Wildlife SenriceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. â€™ 5 , 1 , l , â€¸ ` Â· gÃ·.._n :.1...- 1 a V5l â€¸. Kl 0 Â· E, .Â· nv â€™ 0 & AAA O1 Â· â€™ â€™ ' lazaxs La 4; .1 .. qqoue-. 1 L.: &6Â4Y`vuL,â€™iÂ`Ejofl	5663-A1.pdf	
Due to loss of major food sources, the bears are still endangered	Factor A	. Â· ex, Public Comments Processing Attn: Docket No. FWS-R6â€”ES-2015-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. 'Tlâ€™l@2â€™E: [5 /\â€™BsÂi.uÃ·CQ_;Z Nm Âiâ€™Z.."LL;j . jg] ggg 'P><Ã©2S1' <bl:â€™TI:\<E- Ecogsg AN; clout; esswÃ©gg jggit E:] @" Lt. S. ,,,tts>t_Ã©F.Ã©; f{(Ã©â€™i-.. f' f@ 'B=-=Ã·=â€™=â€™" Ã©Ã©iz. gl \$S\$71 l~Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. }â€™Ã©EPÃ©SÃ©,Qgiu 'l D E.-- br.l'[Z 4;-[5 glu ZLLV gÃ©glg vu ng [Hi guicrnyn} gwrluguygi my mg M0 6 Z; g gy we cr. CONrJÃ©.cTc,0 Âlr ,l;{&\$;}1l;[EM [C gow gig J5 egg/cg;) , Ai-Jâ€™O A; ?0@vcNrzvM <rF gÃ©ggf gggc/=t> gf ALwvJE0 IQ ru gz 5-scw/lj â€™ E rrrgggqq ;. 5 r,gg.J Hm L c U; Yifi Q {[546 g Q . gcgccica ll QE BRC-NAA/Ã· Nâ¸,-7~Public Comments Processing Attn: Docket No. FWS-R6-ESâ€”2016-0042 U.S. Fish and Wildlife Service VIS:BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. .._j l 74/ /114 4iAl AÃ©Ã© Ka, wz. @23- we /44224 x4â€™ T1; ..1 1. ul, Â·Â· /&Z6Dq zu .4 11 JL.;} A1 Â·Â· AJ r . # i d'/4 7 Â¸ , _ 1 / / Â·Â·â€™ Â·- l . {J Q.. AQAM.4 _Â·} rz, ro i,l v JMX . â€™ â€™ ;. new ,.. r' .4*:.; (H A _ M l if ln;Â·â€™ â€™ Â© mz /0 l Â/me H,/1... F A./n. Al _ 1 â€¸,Â· , zi ,Â· mi;; _ ' . rd;? _ Â· Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. l " â€™ r r 1 l â€™ *4*%/ 14 llÃ· A Â· 5 ' l . , â€™ Â· G, r '	FWS-R6-ES-2016-0042-	

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Due to loss of major food sources, the bears are still endangered.	Factor A	ipidrll mobil E r' â€˜ . A l lj 'YL V pi zazzF, "" JI ...L.'.Â»:id . Lia @% __rw/III' *1 / P IÃ© gtzÃ©gztl~IÃ· iâ€œe` â€˜`-â€™"Ã· ..â€™â€™â€™ iv Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife SenrlceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Serviceâ€™s proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I lgfm gm {he viog ^/L Â¸L www Aer 0 t/kskg 5 ok @ ul/All Eg Â· --`[ Avi/\ Qkggg gm; Qwvxeg ln a Ol `kfk â€” LAAAQY -= AA \\A(Â· ;* â€¸ â€™ ' A V\ Q~` Q' Q .i.31,_T Public Comments Processing Attn: Docket No. FWSâ€™R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. ggnii-L\r' l Â· _ Â· Â¸ J â€¸â€™l V l l i Public Comments Processing Q) Attn: Docket No. FWS-R6-ES-2016-0042 *!â¸,-'H' Bâ€™™BlO9.Y` U.S. Fish and Wildlife Service . szvs Leesburg Pike Gp ze mw. M T" Falls Church, VA 22041-3803 ( C; â€™i 7 l S` _ iq Please accept my following comments on Fish and Wildlife Serviceâ€™s proposal to remove Endangered qcb _ . Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. lab? kv BB? glg? cov ygiew `Fâ€™™ 15 QE dlweoc Qvizzlrf lOQ.:c;/ g remgv-ed EgÃ©kgiig gg Sgqdgq Ad". {Lrg; ggalwvcm ag still urccl -â€™"- vwgxe. Sjygllhf igâ€¸J wevvc xi lg Q; ..~\0v~Q :v~Â·\l.P<.Jvâ€™™\`2r/xlj apt/{ om);. jg â€™B\\<JÂ¸=->%v h lmhifaljhi kaeav ygcwg ew [-eg @PE\glvÂ¸Â¸A Â· Pkifgg mgcwgrrdcm yg â€™zÂ·Â¸~.dL 2-No Lo uglggitq gm c.Â¸ 0 vypm~~ _ s -â€™ . 3% Public Comments Processing Attn: Docket No. FWS-R6â€™E5-2016-0042 U.S. Fish and Wildlife SenriceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. â€™ 5 , 1 , l , â€¸ ` Â· gÂ¸».._n :.1...- 1 a V5l â€¸. Kl 0 Â· E, .Â· nv â€™ 0 & AAA O1 Â· â€™ â€™ ' lazaxs La 4; .1 .. qqoue-. 1 L.: &6Â¸4Y`vuL,â€™iÂ¸Ejofl	5663-A1.pdf	
Don't delist the grizzly bear until the Northern Continental Divide and GYE populations are well connected + habitat protections are secured. Also a population of bears should be	Factor A	. Â· ex, Public Comments Processing Attn: Docket No. FWS-R6â€™ES-2015-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. 'Tlâ€™™l@2â€™™E: [5 /\â€™™BsÂ¸i.uÂ·CQ_;Z Nm Â¸§iâ€™™Z.."LL;j . jg] ggg 'P><Â¸2S1' <bl:â€™™Tl:\<E- Ecogsg AN; clout; esswÃ©gg jggit E:] @" Lt. S. ;;;,tts>t_Â¸F.Â¸¸; f{(\Â¸â€™™i-.. f' f@ 'B=-=Â·=â€™™=â€™™ Â©Â©iz. gl \$S\$71 l~Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. }â€™™Â¸EPÂ¸SÂ¸E,Qgiu 'l D E.-- br.l'[Z 4;-[5 glu ZLLV gÃ©glg vu ng [Hi guicrnyn} gwrluguygi my mg M0 6 Z; g gy we cr. CONrJÂ¸E.cTc,0 Â¸rlr ,l;{&\$;}1l;[EM [C gow gig J5 egg/cg;) , Ai-Jâ€™™O A; ?0@vcNrzvM <rF gÃ©ggf gggc/=t> gf ALwvJE0 IQ ru gz 5-scw/lj â€™™ E rrrgggqq ;. 5 r,gg.J Hm L c U; Yifi Q {[546 g Q . gcgccica ll QE BRC-NAA/Â· Nâ¸,-7~Public Comments Processing Attn: Docket No. FWS-R6-ESâ€™™2016-0042 U.S. Fish and Wildlife Service VIS:BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. .._j l 74/ /114 4iAl AÃ©Ã© Ka, wz. @23- we /44224 x4â€™™ T1; ..1 1. ul, Â·Â· /&Z6Dq zu .4 11 JL.;} A1 Â·Â· Â· AJ r . # i d'/4 7 Â¸ , _ 1 / / Â·Â·â€™™ Â·- l . {J Q,. AQAM.4 _Â·» rz, ro i,l v JMX . â€™™ â€™™ ;. new ,.. r' .4*:.; (H A _ M l if ln;Â·» â€™™ â€™™ Â© mz /0 l Â¸/me H,/1... F A./n. Al _ 1 â€¸,Â·» ,. zi ,Â·» mi;; _ ' . rd;? _ Â·» Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. l " â€™™ r r 1 l â€™™ *4*%/ 14 llÂ· A Â· 5 ' l . , â€™™ Â· G, r '	FWS-R6-ES-2016-0042-	

Trigger Text	Code(s)	Unit Text	Document ID	Annotation Notes
When connected + habitat protections are secured. Also a population of bears should be allowed to establish in the Selway-Bitterroot.	Factor A	ipidrll mobil E r' â€™ . A l lj 'YL V pi zazzF, "" JI ...L.' .Â»:id . Lia @% __ rw/III' *1 / P IÃ© gtzÃ©gztl~IÃ·` iâ€œe` â€™ `â€™"Ã· ..â€™â€™â€™ iv Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife SenrlceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Serviceâ€™s proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I lgfm gm {he viog ^/L Â¸L www Aer 0 t/kskg 5 ok @ ul/All Eg Â· --`[ Avi/\ Qkggg gm; Qwvxeg ln a OI `kfk â€” LAAAQY -= AA \\A(Â· ;* â€€ â€™ ' A V\ Q~` Q' Q .i.31,_T Publlc Comments Processing Attn: Docket No. FWSâ€™R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. ggnii-L\r' l Â· _ Â· Â¸ J â€€â€™l V l l i Public Comments Processing Q) Attn: Docket No. FWS-R6-ES-2016-0042 *!â¸,-'H' Bâ€™™BI09.Y` U.S. Fish and Wildlife Service . szvs Leesburg Pike Gp ze mw. M T" Falls Church, VA 22041-3803 ( C; â€™i 7 l S` _ iq Please accept my following comments on Fish and Wildlife Serviceâ€™s proposal to remove Endangered qcb _ . Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. lab? kv BB? glg? cov ygiew `F\â€™™ 15 QE dlweoc Qvizzlrf l0Q.:c;/ g remgv-ed EgÃ©kgiig gg Sgqdbg Ad". {Lrg; ggalwvcm ag still urccl -â€™"- vwgxe. Sjyglhfh igâ€ŒJ wevvc xi lg Q; ..~\0v~Q :v~Â·\l.P<.Jvâ€™™\`2r/xlj apt/{ om);. jg â€™B\\<JÂ¸=->%v h lmhifaljhi kaeav ygcwg ew [-eg @PE\glvÂ¸Â¸A Â· Pkifgg mgcwggrdcmyg â€™zÂ·Â»~.dL 2-No Lo uglggitq gm c.Â¸ 0 vypm~~ _ s -â€™ . 3% Public Comments Processing Attn: Docket No. FWS-R6â€™E5-2016-0042 U.S. Fish and Wildlife SenriceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. â€™ 5 , 1 , l , â€€ Ć ` Â· gÂ».._n :.1...- 1 a V5l â€€Ć. KI O Â· E, .Â· nv â€™ 0 & AAA O1 Â· â€™ â€™ ' lazaxs La 4; .1 .. qqoue-. 1 L.: &6Â¸4Y`vuL,â€™iÂ¸Ejofl	5663-A1.pdf	
Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). An alternative hypothesis that is not considered in The Rule, is that	Factor A	On l\larch 11. 2016 the US Fish and Wildlife released a proposed rule in the Federal Fiegister (vol. 81, No. 48, pp. 13174 - 13227) for, Fiemoving the Greater Yellowstone Ecosystem Population of Grizzly Bears From the Federal List of Endangered and Threatened Wildlife; Proposed Fiule. Herein referred to as The Fiule. Dr. Christopher Servheen, Grizzly Bear Fiecovery Coordinator, U.S. Fish and Wildlife Service is lead author and primary contact for The Fiule.l\ly name is Kathryn Iverson, resident of Edina, l\lN. l\ly husband and l own property bordering the Northeast entrance to Yellowstone National Park. We fish, hike and camp in the Greater Yellowstone ecosystem. We have observed significant changes in this area, including huge die- offs of pines, (you can see the brown trees stretching across mountainsides, seeing evidence of warming waters in trout streams and lakes (algae blooms where none ever existed), as well as personally fishing at Yellowstone Lake with my grandsons, where we saw the tonnage of lake trout that are infiltrating Yellowstone Lake, and outcompeting the native cutthroat trout. Knowing that the grizzly bear is dependent on these ecosystems for survival, l urge the U.S. Fish & Wildlife Grizzly Bear Coordinator to share me deep concerns about delisting the Grizzly Bear from the Greater Yellowstone Ecosystem population. Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Fiule cavalierly dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. Carrying capacity The Fiule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Fiule). An alternative hypothesis that is not considered in The Fiule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement	FWS-R6-ES-2016-0042-	

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carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement for "best science" as required by law.	Factor A	for "best science" as required by law.Excessive, Unsustainable Mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection of the Threatened and Endangered Species act. Removing T&E protection and placing it inthe hands of the three states of Idaho, I\lontana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Genetic Viability The Greater Yellowstone grizzly population is isolated from all other grizzly populations (pp. 13190- 13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly population is seriously flawed and violates the requisite principle of "Best Science.â€™ Climate Change Impacts The impact of climate change on Yellowstone's grizzlies is summarily dismissed in The Rule (p. 13197, p. 13200), by the statement, "I\lost grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the blithe statement that, 'grizzly bears are adaptable, they' do just fine,' with little or no supporting evidence. Population Estimates Accurately estimating the number of bears in a large, rugged area like the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review. Scientific Accountability The IGBST has been less than transparent about making taxpayer funded data (which they have maintained an exclusive monopoly) available for scrutiny by the larger scientific community. All raw data on grizzly bears collected by government agencies should be made available to independent scientists. In view of the wide disagreement about delisting decisions, the USFWS should establish a review panel of independent, academically qualified scientists who are not involved in current grizzly bear research in the GYE.~	5047-A1.pdf	
With the limited food resources like the pine nut from the whitebark pine tree and the Yellowstone cutthroat trout, the bears are leaving the park to forage. Now with climate change decimating the whitebark pine tree, the grizzly sow and cubs have to forage in lower	Factor A	I am writing in opposition to the delisting of the Yellowstone grizzly bear. I agree with Jane Goodall, Edward O. Wilson, Ted Turner, Mike Finley (former Yellowstone Superintendent), George Schaller, grizzly bear expert Doug Peacock, whitebark pine specialist Dr. Jesse Logan, and Dr. David Matson (retired Yellowstone grizzly bear biologist) that it is premature to consider delisting. The decline of their food sources, genetic isolation, and climate change are just a few issues threatening the grizzly bear. And the thought of the states around Yellowstone conducting a trophy hunt is just appalling and inappropriate. With the limited food resources like the pine nut from the whitebark pine tree and the Yellowstone cutthroat trout, the bears are leaving the park to forage. Grizzlies are one of the slowest reproducing mammals and the reproduction rate is in jeopardy due to the these limited food resources. Females can only breed every three years and then the success of their cub reaching adulthood is stacked against them. When the whitebark pine was plentiful, a grizzly sow with cubs would have plenty of food at a high elevation. Now with climate change decimating the whitebark pine tree, the grizzly sow and cubs have to forage in lower elevations competing for food resources with male grizzlies who kill cubs. With bears transitioning to eating more meat, it is even more important to have habitat around the park for the bears and the Yellowstone bison. The Yellowstone grizzlies are an isolated population. Until there is a plan to create corridors and connectivity with the Northern Rockies Continental Divide Ecosystem population, it is premature to delist the bear. It is imperative that there is connectivity. There is potential north of Yellowstone to connect to the Bob Marshall Complex. And also to the west along the Continental Divide to the Salmon/Selway/Bitterroot Complex. Instead of spending money on delisting we should be focusing on wildlife overpasses and underpasses and the importance of connecting these wild places. Grizzlies need to be reintroduced with full endangered species protection to the	FWS-R6-ES-2016-0042-	

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		YP'zi science for a changing world Fomxcmc Bumvion or Noam AMuucAu Bums David J. Mattson P.O. Box 5614, BLD 24 Southwest Biological Science Center Flagstaff, AZ 86011-5614 Colorado Plateau Research Station Phone: 928-556-7466 x 245 Northern Arizona University Email: David Mattson@usgs.gov Predation on Land-Dwelling Prey Even though all three North American bear species can be predators, the grizzly bear is more likely to kill larger terrestrial prey; either because of opportunity (compared to polar bears) or aptitude (compared to black bears). An adult grizzly is large enough to kill most adult ungulates, and equipped with claws, teeth, and power sufficient to deliver a killing blow. Its ready digestibility also means that the typical bear will reap considerable rewards from predation. Bears locate larger land-dwelling prey, such as deer, elk, and moose, by a variety of methods and with varied intent. A certain number of encounters with potential prey are strictly by chance, apparently without deliberate stalk or search. This is typified by one incident where two grizzlies approached some elk behind a blind rise, without either species being aware of the other's presence. However, as soon as the elk came into sight, one of the bears lunged after them, but without success. This unfruitful result probably characterizes the vast majority of these chance encounters, however there are enough recorded kills in rolling terrain or otherwise visually opaque conditions to suggest occasional success under similar circumstances. On the other hand, the majority of observations suggest that both black and grizzly bears most often encounter their prey either after a deliberate search, characterized by movement in the direction of the hoped-for kill, or, with even greater forethought, by putting themselves in areas with concentrations of vulnerable prey. Elk and caribou calving grounds or traditional caribou river crossings are good examples of such areas where, either because of extreme young age, the preoccupations of birth, or the mass confusion of swimming animals, otherwise elusive ungulates become easy prey. This is most dramatically borne out by several graphic descriptions of observers such as Adolf Iurie, Harry Reynolds, Kerry Gunther, and Steve and Marilyn French, of contemporaneous pursuits, kills, and confrontations by grizzlies concentrated on calving grounds in Alaska and Wyoming. Bears clearly use all of their senses		

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USFWS should seek to reestablish grizzly populations, as cited in its 2011 status review. USFWS cited an expectation that the Continental Dive bears and the Yellowstone bears would naturally connect "in the near future". That will not come to pass if hunters kill bears.	Factor A	to track down prey. However, most observations suggest a prominent role for olfactory and audio cues. Bears have often been observed following scent trails associated with potential prey, sometimes for miles, or more convincingly, been seen killing calves at the culmination of a complex search mostly with nose to the ground. There are other phenomena that argue anecdotally for the prominence of hearing in tracking down meat. A number of hunters bugling for elk have surprised themselves by soliciting the apparently predatory interest of a grizzly bear. Concordantly, there is a consistently observed tendency world-wide for increased bear predation on both bull elk and bull moose during their fall ruts. Bears also seem to be attracted to the sound of gun-fire during the hunting season, one can only suppose with the intent of scavenging the gut pile and other remains of a hunter's kill. Although this likely orientation towards sound has not been conclusively demonstrated, it remains an intriguing possibility worthy of further study. Bears can chase down prey in open country, and are more successful at this tactic after separating a young calf from a cow-calf herd. Capture usually occurs after the pursuing bear cuts the corner on a fleeing calf that has been foolish enough to turn. However, most successful bear predations are not the result of long pursuits, but rather the result of a short-range rush either from ambush or after a stalk. Given the relative slowness of bears, at least compared to most wild ungulates, there is a distanceForaging Behavior ofBears . Mattson 2 at which this rush is more likely to be successful or, if not, then terminated. A number of records by different observers in different areas suggest that this "optimal" distance is around 20-50 m. Without the aid of mitigating conditions or tactics, it would be difficult for a bear to get this close to a reasonably alert and healthy ungulate, and so it should be no surprise that most kills are associated either with cover, conditions that hinder prey mobility, or the afflictions of exhaustion, disease, or raging sexual hormones in their prey. Thus, many documented predations have been in or near the edge of willow thickets and dense timber, often near running water; presumably under conditions that facilitate the unobserved approach of a predatory bear. Other predations occur on forest game trails, often as the prey negotiates deadfall or a small draw; under conditions where temporary imbalance or distraction would favor a successful ambush. Otherwise, bear researchers throughout the northern hemisphere have noted the remarkable success of bears preying upon winter-weakened ungulates in spring snow conditions. Surface crusts form that can support the weight of a broad-footed bear but not a larger-bodied ungulate such as an elk, moose, or muskox. Under these conditions the delivery of a killing bite is more often a constraint than over-taking the prey. Similarly, exhausted and/or hormonally-deluded bulls seem to make relatively easy bear prey during and after the fall ruts. One extraordinary story from Siberia recounts a brown bear that lured a rutting bull moose into a willow thicket by imitating the bull's mating roar. Grizzly bears kill land-dwelling prey primarily one of two ways. I\lost often they maneuver to approach over the back, after which they grab the animal around the rib-cage and, if successful, deliver a killing bite to the back of the neck or skull. A bite to the small of the back may be a prelude to this finishing move, or an animal that escapes the first attempted neck bite may be severely wounded on the flanks by the bear's claws as they are disengaged from their hold. An approach from the rear is also the logical consequence of a chase, and on occasion the bear may use its weight to collapse the hind- quarters of an animal that has just been caught. The next most common kill technique involves a bite to the nose and face that at least paralyzes and possibly kills the animal. Either way, the animal does not offer subsequent resistance. Interestingly, there are only a few reports of bears delivering killing or debilitating blows with their paws, and in most cases their paws come into play for such things as pinning down a newly-captured calf or grasping larger prey to facilitate delivery of a killing bite. Bears are able to consume between 12 and 40 kg of fresh meat in a day. However, consumption is not indiscriminate and typically reflects marked preference for some carcass parts. Almost universally, the most favored or at least first eaten portion of a female is the udder. After that, most bears eat the brisket and adjacent rib meat or the meaty proximal part of the front legs. I\lost carcasses are cleanly eviscerated soon after they are killed or found by a bear, with the heart, liver, and lungs selected for priority consumption. The skin, hair, rumen, and stomach are the most consistently unused soft parts of a carcass. In fact, a more-or-less neatly peeled off hide is one of the more diagnostic signatures of bear involvement. Bears are also one of the few consumers that can readily crack the major leg bones of a larger ungulate in pursuit of the marrow. Some bears even get into the habit of cracking the skull so that they can consume the brains. There are other features that distinguish carcass use by grizzly bears. If there are enough edibles to warrant the investment, a bear will typically bury the entire carcass or selected parts of it by scraping adjacent soil and litter over the tidbit with its front paws. Presumably this inhibits decomposition and the dissemination of scent that might attract competitors. As further sign of ownership, you might even find a bear sprawled directly on top of a carcass, attempting to rest while at the same time prevent pilfering by other scavengers. A bear may also move an intact or even partly consumed carcass to a spot more to its liking. If the carcass is not fresh, a drag trail of shed ungulate hair will connect the new carcass location with the rumen contents left at the original site of death. In addition, there are often bear beds nearby and a bear trail leading to the nearest available water (an apparent necessity when consuming such a protein-rich diet). As a final note on this type of predation - grizzlies exhibit marked preference for different sizes and species of ungulates. They are least likely to attack very large herd-dwelling animals that rely upon aggression for predator defense, epitomized by bison. Among the larger ungulates, they seem most likely to attack moose, presumably because of a solitary forest-dwelling existence that lends itself to ambush. However, within any given medium- to large-bodied prey species, bears preferentially prey upon young animals, especially the highly vulnerable neonates. On the other hand, although they are not	FWS-R6-ES-2016-0042-0513-A3.pdf	

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Whitebark pine provides an important food source for grizzly bears. We haveplanted hundreds of thousands of disease resistant whitebark pines throughout its range, focused primarily in the GYE. We caution the U.S. Fish and Wildlife Service (USFWS) from removinggrizzly bears from the list of endangered and threatened wildlife, as this forest type and important source of food is still recovering from the recent mountain pine beetle infestation.	Factor A	We appreciate the opportunity to provide comments regarding the removal of the Greater Yellowstone Ecosystem (GYE) population of grizzly bears from the federal list of endangered and threatened wildlife. American Forestsâ€™ mission is to restore threatened forest ecosystems and inspire people to value and protect our urban and wildland forests. As a primarily forested ecosystem, American Forests has a direct interest in the GYE and the status of its population of grizzly bears. Whitebark pine provides an important food source for grizzly bears. We have planted hundreds of thousands of disease resistant whitebark pines throughout its range, focused primarily in the GYE. We caution the U.S. Fish and Wildlife Service (USFWS) from removing grizzly bears from the list of endangered and threatened wildlife, as this forest type and important source of food is still recovering from the recent mountain pine beetle infestation. As stated in the proposed rule, out of the four common grizzly bear foods in the GYE, "only whitebark pine seeds are known to have an influence on grizzly bear mortality risk and reproduction." Due to their high fat content, whitebark pine seeds can be an important food source for bears in the GYE when they are available. Whitebark pine seed availability can influence the reproductive and survival rates as well as the movements of these grizzly bears. During years of low pine seed availability, bears foraging at lower elevations may be more likely to encounter humans which can also contribute to an increased potential for human-caused mortality. The whitebark pine is currently warranted for protected status under the Endangered Species Act but that action is precluded by higher priority actions. This interconnection between grizzly bears and whitebark pine is recognized in the scientific literature, primarily prior to the rapid decline of whitebark pine in the GYE due to the mountain pine beetle infestation. We are pleased the USFWS is addressing the Ninth Circuitâ€™s concerns regarding the evaluation of whitebark pine in the 2007 attempt to delist the GYE grizzly bears (Greater Yellowstone Coalition v. Servheen, et. al., 665 F.3d 105 (9th Cir. 2011)). American Forests appreciates the analysis of existing research regarding the recent decline of whitebark pine and the grizzly bear dependence on its seeds as a main source of food. However, we believe the impacts of the decline have not been fully understood because the recent infestation of mountain pine beetles has only recently subsided. While the studies conducted during this time show the grizzly bears turning to other food sources, resulting in little changes to their body mass or in the population growth rate, the sample sizes for these studies were small. The "Response of Yellowstone grizzly bears to changes in food resources; a synthesis" that the USFWS relies heavily upon for its1analysis cautions that more data is needed before it could be determined if there was truly a trend in the body condition of the grizzly bears. This further emphasizes that studies may not be conclusive and additional time is necessary to understand the impact of whitebark decline On the grizzly population. The USFWS carefully manages human-caused mortality based on scientific monitoring of the population. It is well documented that in years of low whitebark pine seed availability, grizzly bear-human interactions increase resulting in the mortality of grizzly bears. Again, the USFWS relies on a study from 2000-2012 to determine that the effect of low whitebark pine seeds and human caused mortality is negligible to grizzly bear population growth. However, the most extreme loss of whitebark pine occurred from 2009 through 2015. American Forests cautions the USFWS to conclude that the loss of whitebark pine is not felt by the grizzly bears. As a key food source for grizzly bears in the GYE, we believe the full impact of the decline in whitebark pines has not been adequately studied since the infestation of mountain pine beetles is only now waning. American Forests agrees that, eventually, grizzly bears in the GYE could be removed and touted as a success of the Endangered Species Act. However, that time is not now as the whitebark pine seeds continue to play a large role in grizzly bear recovery. While great effort has occurred to restore whitebark pine to the GYE, much more is needed. American Forests will continue to play our role in restoring the whitebark pine to the GYE. We look forward to working with the USFWS, US Forest Service, State natural resource agencies and others to implement a more comprehensive restoration strategy for the whitebark pine ecosystem which can complement long term management of grizzly bears in the GYE and other parts of their range.	FWS-R6-ES-2016-0042-5157-A1.pdf	

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Habitat loss: Growth around national parks and wilderness areas are the fastest growing areas in the west. People want to live in nice places. Unfortunately griz do not have the latitude or ability to move to many places in the west and survive. They have been pushed in the past to places that people did not want to live. They were plains animals. I have included maps of population growth in the Flathead from 1970-2010 and these maps clearly show habitat loss. If federal lands are transferred to the states as some people want, how will this political action affect the viability of Griz?? Without ESA protections many shortsighted land management decisions will be made that will reduce habitat suitability for Grizzly bear. In the past even in the 1970s when food sources were bad for Grizzly bear, they could go down in the valleys and find food. With the conversion of the valleys to housing and ranching the bear have lost this source of food in times of drought. As global warming continues, where is the habitat set aside by the states to accommodate this top predator? I am amazed at the growth of humans and change of wildlife habitat to human dominated habitat from highway building, human housing development, roads from logging, weeds and the shorter winters in Idaho, Montana and Wyoming since the 1970s. When I project this growth forward, I really do not know where the griz will live in the future. Look at the map of the Flathead in 1970 and then 2010. The growth is impossible to ignore. This growth has happened throughout Griz habitat. The bear was listed in 1975 and look at the loss of habitat and how Montana finally was forced to stop hunting the bear in 1980?	Factor A	5-9-16 To whom this does concern, Please accept these comments on the premature Grizzly bear delisting that is proposed by the USFWS. I am very supportive of delisting Grizzly bears if the population, habitat and food sources are secure to allow for populations to reach historic levels and fill historic habitat. As it is now the USFWS and states are satisfied if the population is well below the historic population of 50,000 Grizzly bears. The listing is unwarranted because the population to be unlisted is small and does not include the historic range of the bears. The piecemeal delisting in one small area of the historic range will not truly recover the species. Griz should not be delisted around Yellowstone National Park when Grizzly bear are not present or struggles to survive in 98% of their historic range. Canada has for many years been looked at as a genetic supplier for many species into the US. The population of Grizzly in Canada is also decreasing due to loss of habitat, roads, oil and gas development, mining and hunting, housing, ranching, farming, etc. These are the same pressures and demands that the US puts on historic Grizzly bear habitat. This delisting will create an island with delisted bear that will become inbred as wildlife corridors have not been determined and protected from fragmentation, road building and human growth in valleys as is easily seen in the included maps. Until hard management strategies are in place to limit human activity (hunting of Grizzly, road building, climate change, trash storage, grazing, weeds, logging, human development of valleys and a basic understanding that Grizzly bear do not have other places to live) any delisting will be the end of this top predator. People need to understand that they live in Grizzly bear habitat out of choice. Grizzly bear do not have this choice of where to live. People need to stop being so self-centered and become educated on how people must change their behaviors to accommodate the needs of Grizzly bear to survive in the long term. The USFWS needs to take on this challenge to educate people on the needs of Grizzly bears and actions that are required to enhance and enlarge places that grizzly bear can live in safely. Hunting: The hunting of Grizzly bear is unacceptable for any reason. The Grizzly bear need to have the same protections as Bald eagles where the eagles are delisted and people cannot hunt them. The states protection of Grizzly bear did not work in the past and will not work in the future without mandates from the USFWS that any future delisting will not allow for hunting until the population reestablishes historic populations of 50,000. A population of 600 Griz is too small to be a viable population. I doubt that the USFWS would consider at a population of 600 humans in the greater Yellowstone as viable if there were only 1200, +/-more humans in the lower 48 states. The reason a hunting ban is imperative is due to listening to a Montana Fish Wildlife and Parks employee saying "that deer populations are increasing in Montana and we hunt them. And the Grizzly bear will do fine hunting them too." The mindset that Grizzly bear are like deer is ludicrous. Also whitetail and muley deer populations are doing fine in cities, but not so well in most of Montana. Blue tongue disease and loss of habitat are harming deer populations. Fish Wild and Parks treats predators differently than ungulates. If populations of wolves are not reduced to "acceptable" levels, the hunting season is increased and new hunting methods are allowed. This includes trapping, increase in numbers of wolves allowed by one hunter to take, silencers, etc. This is not done with deer and elk. FWP and federal trappers do not go out and slaughter a herd of elk or deer with aircraft because hunting targets were not met, they were a threat to cattle or they were too close to my cows. I fear that Griz will be treated as wolves since 600 bears is our target population to keep the Griz off the ESA and this is our target. We will allow for hunting, bear baiting, etc to keep bear at this population at all costs. Delisting of wolves has not gone so well in Wyoming and the mid-west, at least according to federal judges. Federal funding for Grizzly population surveys will stop after 5 years. Will it then be left up to the states to monitor Grizzly Bear? Is there a funding mandate placed on the states to monitor the Grizzly populations? Economics: There has been new economic information on the value of Grizzly bears for tourism. The study showed that Grizzly bear are an economic driver for tourism. Hunting Griz will hopefully create tourism boycotts. Disease: Due to the small population of grizzly bear, islands of bear habitat and global warming, it is possible that the Yellowstone population could be decimated with a disease that the bear would never recover from. 700 bear are too small of a population for long term survival. How does delisting now respond to issues of disease? Isolated populations: Unfortunately politics punched a hole in the ESA when Senator Tester put a rider on wolf delisting. Up until that point, whole populations needed to be at least stable growing throughout species historic range before delisting could happen. The delisting of pockets of Griz when the bear are not established in their historic range is shortsighted. How are the bear doing in the Cabinet Yaak. How will the bear do around Glacier long term when one looks at human development? What is the acceptable population numbers and habitat that the USFWS has determined for Griz to be delisted in the lower 48 states? Look at all of the human growth in the Madison, Gallatin and Paradise, Boulder and Red Lodge Valleys. How does this growth allow for Griz to re-inhabit historic ranges? Food sources: The diet of Griz around Yellowstone NP has changed drastically. The bear have lost whitebark pine, cutthroat trout and moths as a major high nutrient food source. As a result their diet has needed to change. How will delisting these bear now protect future bear generations if they lose other food sources? Is there enough habitat and human tolerance for Griz that will allow for Griz to use new habitat for new food sources? How will delisting effect Griz if the bear take cattle on federal grazing leases? New threats: The new threats come from the same old major threat-humans. Without the ESA protections it will be difficult for policies to be put in place quickly to protect Griz. Look how long it has taken to establish viable Bull trout critical habitat? Habitat loss: Growth around national parks and wilderness areas are the fastest growing areas in the west. People want to live in nice places. Unfortunately griz do not have the latitude or ability to move to many places in the west and survive. They have been pushed in the past to places that people did not want to live. They were plains animals. I have included maps of population growth in the Flathead from 1970-2010 and these maps clearly show habitat loss. If federal lands are transferred to the states as some people want, how will this political action affect the viability of Griz?? Without ESA protections many shortsighted land management decisions will be made that will reduce habitat suitability for Grizzly bear. In the past even in the 1970s when food sources were bad for Grizzly bear, they could go down in the valleys and find food. With the conversion of the valleys to housing and ranching the bear have lost this source of food in times of drought. As global warming continues, where is the habitat	FWS-R6-ES-2016-0042-5183-A1.docx	

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		What the conversion of the valleys to housing and ranching the bear have lost the source of food in times of drought. No great farming continues, there is the need to set aside b the states to accommodate this top predator? I am amazed at the growth of humans and change o f wildlife habitat to human dominated habitat from highway building, human housing development, roads from log ging, weeds and the shorter winters in Idaho, Montana and Wyoming since the 1970s. When I project this growth forward, I really do not know where the griz will live in the future. Look at the map of the Flathead in 1970 and then 2010. The growth is impossible to ignore. This growth has happened throughout Griz habitat. The bear was listed in 1975 and look at the loss of habitat and how Montana finally was forced to stop hunting the bear in 1980? Now you want to leave it to the states to manage Grizzly bear ? Griz are not deer. Global warming: From 1978- 2000 there were over 30 more frost free days in Montana. It does not get down to -50F anymore. Forest fires and lower and less snow pack will be more common. How does delisting the bear now protect them in the future as their present habitat will be unrecognizable in 20-30 years? Hunting: There is no rational reason the hunt Griz again. I have hunted in the past and do support hunting. But not for Grizzly bear. They reproduce too slowly and there are too many human caused threats present and unforeseen future ones to allow for the states to hunt them. Look at Wyoming â€™s plan to only allow wolves in a small part of the state. Look at Idaho that says they are doing elk studies in the Frank Church River of no Return Wilderness with helicopters and it turns out it was only to hunt wolves? Look at Montana where wolf hunting rules are being relaxed and new manners of killing them is looked at ev ery legislative session? I do not trust these states to wisely manage Griz. Past hunting got the bear listed. While the public in general wants top predators on the landscape, local ranchers and hunters do not like top predators. Ranchers with federal grazing leases hate predators and will shoot more of them without federal protections. What will happen when a hunter wounds a bear and the bear gets pissed and starts killing people? Bear are not deer. There is no reason to hunt bear. It will encourage poaching, allow for ranchers and farmers to shoot bear on sight and unfortunately lead to the bearâ€™s eminent demise. Please do the right thing for future generations and stop the delisting of Grizzly bear until there are stable populations in the Frank Church and Selway-Bitterroot Wilderness Areas, the CM Russel, Washington, Idaho, Oregon and California(the bear is on their state flag). As you know top predators improve habitat for all species. Including humans. The piecemeal approach to Griz delisting is short sighted and will fail the species that the ESA was designed to help. Thanks for your time , Stephen Braun PO Box 5614 Whitefish, MT		
	Factor A	Flathead CO HO .i 3 Q,Â· L; ` , _ _ ` 'Â·r , I \Â» I, I 4* III * I I I x 'V 'IV I _ , \ Â· Â· I _ .â€” * Â· , r " Q; I I &; \$ _ , _ ; Z; " _ I â€” Â» & Â» Â» Â» Â· : Â· . I V ` i ' I { III   Â» Â·   3 II II _ . Â· â€”   V Y T a. II Q II: Â· â€”   4 II .. V ' Q II   Â· Â· I 1; r; - A = _ Â· c â€”   V V I . Â· Â· V   Â° J II ? J n w q i k ' - \ K â€” - Â· I _ \ ` Â· * Â· I h Â· I E â€” Â· I i V â€” _ { " I . ; ` Â» I - V 5 { V I I " Â· f _ Â· Â· ' I r r;   _ , Â· ' V " I F. ` ` Â° . _ K I I I I   Â» ' â€” . I I / I   Â°   "   Â° I ' I I I _ â€” \ * . I n â€” V â€” I Â° â€” Â·   3 * % %     I a I V * Â» * Â· I I ; " . Â» - I \ v I I ". ~   â€” - I i I Â· â€” I â€” Â» I V . â€” I r " I . = I V I : n     i v I - , V - Â· . " Â» .   . ` Â· I " . I â€” , ~ . ` â€” I I   g p   Â»   â€” v h ' â€œ I â€” Â· I . 4 n . â€”   I 1 _ I Â· " I I â€” I   L â€” Â· , - â€” ` - ' F ' * " â€” . - I i . â€” I I â€” # I I Â» J `     V I ;   ? . I V   " 1 . A V ~ I ' V V â€” . I f Â· ~ â€” â€” â€” â€” i " H _ ; I I I I 4 - I I I I   i n   I V . . # - . 75 ' Â· * ' Â» I ' I I I   I R I I I I   I . /   Â· Â° @ 1 I ` Â· â€” Â· ~ ~ I { ; ; i ~ Â· _ A I I } I : L ; ' i â€œ N , . _ ` Â· I : . _ I n I { Z . - _ ` I . I ` I â€” _ V ; E I I V â€” V I ' " . I I . { J M # . 5 ` â€” - V I I I I I ; . Â· V V V V V I I , \$, Â» Â» V V \ q Y " j , w , ; Â· _ . . : , _ i t " " Â· K I U . Â» , // 1 ` Â· I V = â€” I I   i ' I I V I I V I I I I \ I I I Â· I @ 2 * T ; I I I I â€œ I v w . - I â€” I Â· ' Â° I I ' I I I   { I _ " " _ I E Ã© , _ , _ I ' r _ â€” I < _ { _   â€” , , Â· , .   , . I , I Â» _ ; _ , , } I , \ - . I * I { I I I I ? I \ ; I I I . I I \$ _ I _ ` I - 1 E _ ` V _ v _ \ _ I " A Â· â€” Â· E I " " Q â€œ ' " ; ' < V ~ I , ' Â» _ 41 > . " " Â· I _ 5 I I . ; ' Â· I	FWS-R6-ES-2016-0042-5183-A2.pdf	map of Flathead housing density

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	Factor A	lathead C0 H0 â€˜ [3 Â· . usmg ensnty 2010 â€˜. e * Â» .4;* ~ " â€™Â· n ~ Â· q xw ~ _? =â€˜f, _ - â€™, j ` \ V/Air \ `` . *- ">" w ~ __ `x_ V ~ ' TQ â€™ V` } Y ` "fr" I * _ ` 7 . A `Â·â€˜Â»"" K ' Â», ` __ 5 e _ . Ai 4 ` Â»i *1 " â€™ -1'F`r M 7 â€™ * ~ ~ ~ ~ ~ L ~ `Â·0_ 3 Â»Â» . . ' " Â·= ` Â· \ , \ MNK, .. __ ` * ' ' ' Â· _â€™ Â·   Â·. Â· _ _ V, ~ { ` ,:â€™ ~ L k ` ' . , g ' r/ FV " { E =i' Â· ` K. A Y ~ ' â€™ , ,. â€™ ` R V i W ` `; W _ ] 2Â·. *1 ` fr ` i \ W Â· I t i Â» 1` ; . ' : _â€™â€™ Â© ~;; Â·;Â·- 3 ` ~ L I 2 . Â»Â»&& Â» i _0Â»0 Oya- i ` * â€™ E _ Â» . . Â·â€˜ Â· â€™ V { Q â€œ}; _ I ; _ Â»Â·â€˜â€™â€™ * Â· 2 "ji â€™Â» * A x' "â€™ Â· â€˜ gI T ~ ~ < _ , !;Â»Â»Â»\ # _ ,)Â€' â€˜ Â· 0000 _ â€™ Â»â€˜ T Â· â€™ z " ' Â» { _ is 0 , ' Â·. * iÂ· Â· Â· W â€™ ` â€™ Â· . " â€™ gv V Â» Â· * .f-x . ` ,. {J A ~\F '\ _ ` xg V y . 1 â€œ.r â€™ ~ r , Y â€™Â· â€™ < * < ; > â€™ Â»Â»Â· 1 ' , â€™ , - V I y : 7 ` - _ K ` ` Â» . ` "â€™ â€™ Â· J ` I ` ` Â»}\$â,~Â» ` â€™ ` ? Q Â» * 5 ~â€™ , _ , r Â· 2; â€™ â€™ ,* Â· ~ J L _ â€™ W j _ , . 0 Â» â€™ Â· , _ Qi; JÂ»Â»Â· ~ ~ " 1 ` [ ` Y v Â» . . "J â€™ * z , â€™ ~ ` Â»Â» E r r J' , ` " V ' , â€™ V V Â· } Â· ` Y p < Â· Â· Â» ~ Â° Y Y * ? T ; ; Â» # T , ? i : \ 2 Â· Â· , q t ` I â€œ - " R L u T V Â° â€™ "" : ` kx; ` Y . ` - Â» _ K :: V "rv , V _ â€™ , â€™ K , 0 I ' Â· c . / , , , , & ? ` Â· , ' , E ` ; r Â· } Â· c t â€™ ; Â» g Â» V ` â€™ ~ , -- Â· I ' ' â€™ ki { Â· â€™ _ _ rg . _ * L _ Â· 3 - ; = ~ , _ , _ yr t' _ _ " @1: `   Â» V ' â€™ Â· ~ â€™ â€™ "â€™ Â»i.â€™ , ~ Â· Â· â€™ * * â€œ . â€œ gii ; _ g rw ' V sj   J â€™ ~ F, Â» e Â· % # â€™ ~ Â» , , Â· * â€™ â€™ â€™ , I P M Â° J - if , Â» w Â· â€™ â€™ ; it Tim â€™ 4 , z Â» Â· fi ~ 0 ` Y , I . - , _ , ? 2 - . g" ` ~ 0 ~ 0 , Â» rq ; < Â· c w â€™ " , , 5 0 e z > ~ Â· ~ ; 00 Â· , J , Â» s ~ â€™ ; T , / z f q w ? Â» y Â» Â° \ â€™ _ 0 2 , â€™ O { â€œ ' Â· -   " " f Â· '   â€™ f â€™ * } ; @ W , 0 i ' ` . 0 _ â€™ "â€™ 4 â€œ . Â» Y Q ` Y = * Â· _ , ' â€™ â€™ â€™ * qu I ; ` _ â€™ _ Â» â€™ " Â» f â€œ T ~ ! . ~ Â· , â€™ , â€™ . ` iw , . ~   , Â» ~ 000 - 0 .. Â» , 0 L _ _ 0   , < , Â· . J Q fi . â€™ - ~ â€˜ % â€œ - 0 Â» 0 ' â€™ 7 ; Â» . V . ~ Â· 0 â€™ ' â€™ â€™ . ' 0 . W ? â€™ 0 ~ ! ' â€™ â€™ V Â» ` 0 Â· * g ; < ! ? Â· Â· ~ â€™ 1 Â» . 7 we ; â€™ \$: 3 ' J â€™ > 4 " nr â€™ â€™ Â· ` V L ' ' â€™ " ` L g ` r ~ 0 Â· â€™ ~ 000 Â· Â» Â» * Â· r ` " Â· < , 0 ; , ' Â· Â· â€™ Z â€™ : Â· & Â» , 0 0 it Â», * Â· ` 3 w . ` n _ . = ~ 0000 M Â· < j V . 7 } ; ; fa . ' , â€™ * _ _ * _ Â· 1 â€™ ~ > Y Â· (â€™ I F â€™ â€™ ; Â» â€™ 0.0.0. 0 * â€™ Â» . â€™ Â» - 0 0 â€™ â€™ , , 3 ' . * Â· Â» ` ` d l â€œ , [Q â€™ Q â€™ 0 _ Â» Â· 5 - â€™ g , â€™ ; _ _ ~ 000 Â· " 0000 j 0 " T ` _ , Â· , g L , L4 - i 1 V Q Q ` : ; Â· 0 7 * 0 â€™ â€œ v ' 0 T , â€™ 2 * . A â€™ â€™ â€™ r ` F Q Y Â» â€™ ix i Â· * Â· Â· 4 ` â€˜) ` 0 ` E P ~ r ' y A ; wr . â€™ Â· â€™ V , Â· I ~ E , " ek ` ` K I ` ` 0 Y â€œ 00-0 â€™ 00-Â» * ; E â€™ ' ~ â€™ , _ Â» ~ g ; ` V > V1 Ex ? _ ` _ V ny j â€œ _ J _ _ ~ = j Â· : 2 _ . 0 V L z ` I , 0 0 g j Â· ~ _ ; , jg Ala 0 x ~ 0 J g yp } T â€™ r V U . w Â· Â» ~ \ / â€™ , ` L \ . \ â€™ q ' = ` ' Â» : ` "" < * A Â· â€™	FWS-R6-ES-2016-0042-5183-A3.pdf	map of Flathead housing density
		As a resident of the state of Idaho, I know first hand Idaho state agencies do not have the moral gumption or leadership to â€œmanageâ€ grizzly bears. The Idaho Department of Fish and Game has proven this with their killing programs associated with wolves. They have also proven their inability to prosecute individuals who kills species protected under the Endangered Species Act. Allowing state agencies to care for our wildlife particularly in Montana, Idaho, and Wyoming has proven fatal and devastating to the health of ecosystems . I concur with the following statement created by the Park County Environmental Council. On March 11. 2016 the US Fish and Wildlife released a proposed rule in the Federal Register (vol. 81, No. 48 , pp. 13174 - 13227) for, Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears From the Federal List of Endangered and Threatened Wildlife; Proposed Rule. Herein referred to as The Rule. Dr. Christopher Servheen, Grizzly Bear Recovery Coordinator, U.S. Fish and Wildlife Service is lead author and primary contact for The Rule . The Interagency Grizzly Bear Study Team (IGBST) is the lead organization responsible for research and monitoring efforts on grizzly bears in the Greater Yellowstone Ecosystem (GYE). There is a public comment period until May 10, 2016. The following are major points are of concern identified with this proposed delisting action. Excessive, unsustainable mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population		

Trigger Text	Code(s)	Unit Text	Document ID	Annotation Notes
Carrying capacity The Rule interprets the expanding range of Yellowstone 's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). An alternative , and more reasonable , hypothesis that is not considered in The Rule , is that carrying capacity itself has been reduced, prim arily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement for "best science" as required by law. Â	Factor A	ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection of the threatened and Endangered Species act. Removing T&E protection and placing it in the hands of the three states of Idaho, Montana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Climate Change Impacts The impact of climate change on Yellowstone's grizzlies is summarily dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the blithe statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they m igrate into high-elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has . Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). An alternative , and more reasonable , hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, prim arily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement for "best science" as required by law. Genetic viability The Greater Yellowstone grizzly population is isolated from all other grizzly populations (pp . 1319 0-13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly population is seriously flawed and violates the requisite principle of "Best Science." Population Estimates Accurately estimating the number of bears in a large, rugged area like the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review. Scientific Accountability The IGBST has been less than transparent about making taxpayer funded data (which they have maintained an exclusive monopoly) available for scrutiny by the larger scientific community. All raw data on grizzly bears collected by government agencies should be made available to independent scientists. In view of the wide disagreement about delisting decisions, the USFWS should establish a review panel of independent, academically qualified scientists who are not involved in current grizzly bear research in the GYE. I also take issue with delisting the grizzly bear and opening up its population to hunting pressures. Grizzly bears are NOT recovered. Their gestation cycle is slow. Viable population numbers will be impossible to maintain with open season hunting. The vitriolic hate for grizzly bears and fear alone threaten the species. I have hopes that one day, grizzly bears will eventually repopulate the Selway Bitterroot Wilderness in north-central Idaho. This will never be possible if the State of Idaho is left to care for our bears. People will shoot the bears all in the name of generating revenues for the State of Idaho.	FWS-R6-ES-2016-0042-5313-A1.docx	

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Yet another serious threat to grizzly bears in the GYE is habitat destruction. Every year new homes and developments are built in the GYE, forcing grizzly bears to relocate and further damaging their food sources. Habitat destruction is also a major threat because grizzly bears in the GYE are at great risk of becoming an island or isolated community. Grizzly bears in the GYE are indistinguishable from grizzly bears in other parts of Montana. Because grizzly bears travel substantial distances, delisting them in the GYE necessarily threatens grizzly bears from other areas, too, in Montana, Idaho, and Wyoming. As habitat destruction increases, it will become more difficult for grizzly bears in the GYE to connect with other grizzly bear populations, rendering them increasingly vulnerable to disease and genetic issues as an island community.	Factor A	Christopher D. Meyer 210 S. 3rd Street Livingston, MT 59047 @0 406-222-1558a~aÂ·Â· Â¿ 02* Public Comments Processing, ti? O Attn: Docket No. F U.S. Fish and Wildlife Service, MS: BPHC, ~Â¿Â§"â€~Â¿ 5275 Leesburg Pike, Falls Church, VA 2204]-3803.May 7, 2016 Re: proposed rule that would delist Grizzl Bears in the Greater yellowstone Ecosystem (GYE) To whom this concerns: I write in opposition to your proposal to delist grizzly bears in the Greater Yellowstone Ecosystem (GYE). The best available science and commercial data do not show that the GYE population of grizzly bears has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act. Your proposal depends heavily upon the conclusion that the population of grizzly bears in the GYE has increased. By itself an increase in population is an insufficient ground to delist a species when immediate threats to its survival are obvious and ongoing. Moreover, estimates as to the population of grizzly bears in the GYE must be viewed with tremendous skepticism because it is impossible to do more than roughly estimate their population. Crude population estimates should not be relied upon in deciding whether to st1Â-ip grizzly bears of protection that is essential to their survival. It cannot be denied that the protection of grizzly bears under the Endangered Species Act has been critical to their limited recovery. I also oppose the proposal to delist grizzly bears in the GYE because it flatly ignores the inconvenient but incontrovertible scientific evidence of serious ongoing threats to grizzly bears in the GYE. Climate change is a continuing threat to grizzly bears. Whitebark pine trees, as one example, have been decimated by mountain pine beetles, white pine blister rust, and climate change. It is a documented fact that whitebark pine nuts are an important food source for grimly bears in the GYE, yet their number and availability decline each year, putting increased pressure on grizzly bears. Fish, another important source of food for grizzly bears in the GYE, are also under severe pressure because of climate change. Ever smaller snow packs, the result of climate change, have meant increasingly warm stream temperatures that damage fish populations in the GYE. Trout, for example, thrive in cold water, but river and stream temperatures in the GYE are rising in step with climate change. These injuries to grizzly bearsâ€™ food sources will only increase because climate change, by all credible scientific estimates, will worsen in the coming decades. Climate change has also led to more forest fires, of increasing severity, that damagegrizzly bear habitat and put additional stress upon them. And as a direct result of climate change, grizzly bears emerge earlier each year from their dens and they are increasingly hardpressed to find food then. Climate change is not a passing phenomenon: the scientific consensus is that its impacts will worsen with the passage of time. The threat to grizzly bears from climate change is serious and will worsen in the coming decades. Yet another serious threat to grizzly bears in the GYE is habitat destruction. Every year new homes and developments are built in the GYE, forcing grizzly bears to relocate and further damaging their food sources. Habitat destruction is also a major threat because grizzly bears in the GYE are at great risk of becoming an island or isolated community. Grizzly bears in the GYE are indistinguishable from grizzly bears in other parts of Montana. Because grizzly bears travel substantial distances, delisting them in the GYE necessarily threatens grizzly bears from other areas, too, in Montana, Idaho, and Wyoming. As habitat destruction increases, it will become more difficult for grizzly bears in the GYE to connect with other grizzly bear populations, rendering them increasingly vulnerable to disease and genetic issues as an island community.We need not speculate about the impact of climate change and habitat destruction upon grizzly bears in the GYE. In recent years grizzly bear mortality in the GYE has increased, not decreased, because of climate change and habitat destruction, the accelerating destruction of food sources for grizzly bears in the GYE, and the mounting pressure upon them to find new food sources even at the risk of conflict with humans. Montana, Idaho and Wyoming have announced that if the grizzly bear is delisted in the GYE, they will allow trophy hunting of grizzly bears. Grizzly bears, however, reproduce extremely slowly. Trophy hunting of grizzly bears will reduce their populations and their recovery from such hunting will be extremely diiiicult, especially when they must also reckon with the aforementioned challenges from climate change and habitat destruction. For all these reasons I object to the proposal to delist grizzly bears in the GYE and urge you to reconsider your proposal. You are charged with protecting these magnificent animals and you should honor that responsibility. Thank you.Since ly, L J Christopher D. Meyer2	FWS-R6-ES-2016-0042-5688-A1.pdf	

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The Association is deeply concerned that without a balanced approach to species conservation and protection, which recognizes and includes a recognition of the contribution private working ranching landscapes provide for multiple species and ecosystem services, the resulting consequence will ultimately be a loss of habitat as these ranges are sold and subdivided.	Factor A	The Wyoming Association of Conservations Districts (WACD) appreciates the opportunity to comment on the proposed delisting of the grizzly bear. The WACD represents Wyoming's 34 local conservation districts which are political subdivisions of state government. The local Districts are charged statutorily with natural resource conservation, including water, soil, range and wildlife habitat. Further, the districts have statutory responsibility to work with the private land owners to conserve their natural resources and provide for economic stability and sustainability. 11-16- 101 et. seq., The Greater Yellowstone Ecosystem grizzly bear population has been recovered for some time. It is appropriate for the Service to delist. This is an example of species conservation success, in no small part due to the efforts of the state wildlife management agencies and those living and working within the grizzly bear areas, and delisting should be pursued expeditiously. Given the WACD's responsibility to provide for a balanced approach to both conservation objectives as well as stability in the industry, we believe it is imperative that the management of bears be transferred to the states. The private landowners in Wyoming provide significant habitat for wildlife resources. For example, the statewide distribution of habitat is 55%, 40%, and 58% of pronghorn, elk, and mule deer winter range, respectively, is in private ownership. The statewide distribution of privately-owned Greater Sage-grouse core habitat is approximately 35%. This habitat is provided by predominately working ranches. These same private landowners are experiencing significant losses from both grizzly bears and wolves, hence continuing to put pressure on their ability to maintain economically viable operations. The Association is deeply concerned that without a balanced approach to species conservation and protection, which recognizes and includes a recognition of the contribution private working ranchingWACD Comments; Grizzly Bear delisting May 10, 2016Page 2... landscapes provide for multiple species and ecosystem services, the resulting consequence will ultimately be a loss of habitat as these ranges are sold and subdivided. The Association is concerned with the expansion in the conservation strategy inclusion of areas specifically acknowledged as socially unacceptable for GB recovery. These include the southern end of the Wind River I\lountains and a portion of the Grey's River I\lanagement Unit on the Wyoming/Salt River Ranges. WACD believes it is imperative that the Service recognize that in the discussion of "voluntary relinquishment" of grazing allotments, and subsequent buy out of these by NGOs is not truly voluntary. It is only under duress that these "voluntary" relinquishments occur. Further, again the Association would reiterate for every action there is a consequence. One that in the case of further reduction of working ranches in the west, results in a loss of habitat for a myriad of species. The recovery of the grizzly bear has been achieved in a large part due to the actions of the state wildlife management agencies and the citizens within the GYE bear areas. It is past time for the management authority to be restored to the states.	FWS-R6-ES-2016-0042-5324-A1.pdf	
We can't delist the grizzly right now, its food sources are in decline, cub mortality rate is high, there is no connectivity between the Greater Yellowstone Ecosystem and the Northern Continental Divide Ecosystem, and human caused grizzly bear deaths are at an all-time high.	Factor A	J! if C`Â· qemiuq iw _one @56* QW __ .. .... :15: .. __ c  cs ww  { QM 3  * 6 Cu  r- â€” `Â·;=, Â· 0 0 fs Oc `jflÃ©wnum Cv ....ad bg +0umi lywk} pmt; Em; A1-gmmqzz? gnazjil jj Cxe_. i_ __ fu igmye gc beU. .... gf fr>@ _; ` A ; F - qA,) _TL7 <><.Y*~â€” Â¤]O,`J _~L:n,_\IÂ\$2;Â¤;~:nlA.@;P&x;Â¤;}Â·;L;&L-Â·Â¤Â·yÂ¤,,_;.i;;Â¤..,% ..._j `.. gÂ· ;]IAÂ¤1f`]~\ Â· 5; _ iy _____ _____ _____. i . . . 9*; - -. --â€”â€”â€”~	FWS-R6-ES-2016-0042-1226-A1.pdf	

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In addition, demographic and genetic connectivity with other historic population centers of grizzly bears(in the Northern Continental Divide Ecosystem [NCDE] and the Selway-Bitterroot Ecosystem [S-BE]) is anecessary condition for full recovery of the grizzly metapopulation in the lower 48 states: any Statemanagement plans must allow for the natural dispersal of grizzly bears between these areas and the Greater Yellowstone Ecosystem: hunting of any grizzly bears within connectivity corridors must beexplicitly prohibited.	Factor A	Comments on the 2016 Proposed Grizzly Bear Delisting Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. 81 Fed. Reg. 13174 (March 11, 2016). Frank Lance Craighead PhD. 10 May, 2016. I would like to submit this letter, representing my professional opinion as a wildlife and conservation biologist, as part of the public comment period for the proposed rule delisting the GYE grizzly bear (Docket No. FWSâ€”R6â€”ESâ€”2016â€”0042). Comments regarding the uncertainty of long-term population stability due to genetic issues and metapopulation connectivity have been adequately expressed by the American Society of Mammalogists and the Society of Conservation Biology in theirjoint letter of May 10, 2016. I will restrict my comments to the question of State management of grizzly bears. The proposed rule states that: "The participating States of Idaho, Montana, and Wyoming must adopt the necessary post-delisting management objectives, which adequately ensure that the GYE population of grizzly bears remains recovered, into enforceable regulations before the Service will proceeds with a final delisting rule." Grammatical errors notwithstanding, this statement mandates that â€”enforceab e regu ations' must be promulgated by the States to ensure that the population remains recovered. In my opinion, this means that allowable mortality, by all means, must be consistent with the historic rates of mortality which allowed the population to recover to its current status. Excessive mortality will cause a decline in the population and eventual return to threatened status. Also, suitable grizzly habitat that is currently below carrying capacity still exists in many parts of the ecosystem; particularly in the Gallatin and Wind River Mountain Ranges. State management must allow these areas to be re-colonized by grizzly bears in order to ensure a robust population that is more resilient to climate change. Assertions by the States that grizzly bear occupancy of these areas is â€”socia y unacceptab e' has no basis in fact; this public land and this grizzly population are national treasures that are clearly valued by a national constituency; a handful of local users with grazing rights on public lands, and a handful of State agency administrators who made this assertion, do not represent the will of the American public. In addition, demographic and genetic connectivity with other historic population centers of grizzly bears (in the Northern Continental Divide Ecosystem [NCDE] and the Selway-Bitterroot Ecosystem [S-BE]) is anecessary condition for full recovery of the grizzly metapopulation in the lower 48 states: any State management plans must allow for the natural dispersal of grizzly bears between these areas and the Greater Yellowstone Ecosystem: hunting of any grizzly bears within connectivity corridors must be explicitly prohibited. In summary, State management plans must be completed well before the final delisting decision is made so that these plans can be carefully considered to ensure that if delisting proceeds the States will: 1. Keep total grizzly bear mortality within historic limits set since 1975, 2. Allow for the expansion of the population within all suitable habitat within the GYE, 3. Allow for the unhindered dispersal of grizzly bears between the GYE, the S-BE, and the NCDE, and that regulations to accomplish these goals are enforceable.	FWS-R6-ES-2016-0042-5389-A1.pdf	
Yellowstoneâ€™s bears are a remnant and isolated population. They must be allowed to wander safely outside of Yellowstone National Park	Factor A	We are vvriting t0 thank y0u f 0r y0ur leadership 0n climate change and t0 ask f0r y0ur help: Yell0vvst0ne grizzly bears are in grave danger. Y0ur administrati0n has regrettably taken steps t0 strip the bearâ€™s federal pr0tecti0ns under the Endangered Species Act (ESA), Opening up a grizzly bear tr0phy hunt 0n the edges 0f Yell0vvst0ne Nati0nal Park. Yell0vvst0neâ€™s bears are a remnant and is0lated p0pulati0n. They must be all0vved t0 vvander safely Outside 0f Yell0vvst0ne Nati0nal Park.Americans vv0uld never accept hunting 0f Americaâ€™s bald eagle; hunting Yell0vvst0ne grizzly bears is equally unacceptable. T0 make matters vv0rse, Americaâ€™s great bears face the same l00ming threats as many species acr0ss the c0untry due t0 climate change. In the last decade, climate change has decimated the Yell0vvst0ne grizzlyâ€™s m0st imp0rtant f00d, the vvwhite bark pine nut. Unf0rtunately, the March 3, 2016, delisting ann0uncement by the U.S. Eish and Wildlife Service (PWS) came paired vvith an ast0nishing declarati0n in the Eederal Register: "Therefore, vve c0nclude that the effects 0f climate change d0 n0t c0nstitute a threat t0 the [Yell0vvst0ne grizzly bear p0pulati0n] n0vv, n0r are they anticipated t0 in the f uture." This statement is even m0re disturbing in light 0f y0ur administrati0nâ€™s c0mmitment t0 addressing climate change, because climate change predicti0ns are dire f0r all 0ur planetâ€™s species. H0vv can it be that the military c0nsiders climate change in all its decisi0ns, vvwhile the agency resp0nsible f0r 0ur vvildlife, the EWS, d0es n0t? The same argument- the denial 0f climate change â€” vvwas used by the EWS in 2014 t0 deny listing the vv0lverine in the l0vvver 48 states. On April 4, 2016, that decisi0n vvwas reversed in federal c0urt, and declared "arbitrary and caprici0us." The EWS vvwas Ordered t0 rec0nsider its reas0ning ab0ut climate change. Itâ€™s n0vv time f0r this federal agency t0 play catch up and use "the best available science" t0 keep grizzly bears 0n the ESA list. A critical questi0n: Wh0 benefits fr0m delisting Yell0vvst0neâ€™s grizzly bears? The Only certain Outc0me 0f delisting bears vvwill be tr0phy hunts in Idah0, M0ntana and Wy0ming. We ask y0u t0 instruct 0ur federal vvildlife managers t0 Withdraw the March 3 rule and Order the EWS t0 take an0ther l00k at h0vv climate change impacts grizzly bears. Anydecision about the bearâ€™s future should be put on hold until independent scientific review can explore potential impacts to bears from climate change. We strongly suspect that Americaâ€™s great bears face a dire future, even with the continued protection of the Endangered Species Act.	FWS-R6-ES-2016-0042-5416-A1.pdf	

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Surely Fish and Wildlife knows that Grizzlies are well suited to occupation of many areas of their former ranges and domains in the West. There is a lot of suitable habitat. Why doesn't USFWS have a mechanism to connect Yellowstone bears to the huge Selway-Bitterroot Wilderness of north central Idaho? There should be provisions for safe passage in both directions from the Greater Yellowstone Ecosystem (GYE) to the Selway via the Red Rock	Factor A	US Fish & Wildlife Service COMMENT on draft proposal to Delist the Yellowstone Grizzly I am a Wyoming native who lives in Cody , 50 miles from Yellowstone Park on the edge of the Greater Yellowstone Ecosystem. Much of my life has been spent in the backcountry of the Absaroka Range in prime grizzly habitat, and countless hours in Yellowstone Park. I reckon I have had around 200 encounters with and close range sightings of Grizzly bears in my lifetime, all good. The Great Bear is a topic of major concern in my region. I've engaged the state and federal agencies on grizzlies ands other issues for over 40 years. I feel qualified to give a considered opinion on Grizzly management. I am strongly opposed to the Delisting of the so-called Yellowstone Grizzly Bear. The proposal by USFWS to Delist the Grizzly and give management over to the states of Wyoming, Montana , and Idaho is flawed. The only reasons that justify grizzly delisting are political. The reasons against delisting are expressions of accumulated science, the ecology and range management aspects, habitat concerns , and the appalling prospect of allowing the State game agencies to " manage" grizzly bears given their track record and narrow views; e. g. the Wyoming Game and Fish draft plan for management falls apart if the goal is to assure a healthy bear population in the far future. Neither Fish & Wildlife nor Wyo Game and Fish have produced a plan to guarantee the Yellowstone Grizzly's sustainability based on the needs of the bears. All plans put forth are People Plans , not Bear Plans. Best Available Politics, not science , not genuine wildlife conservation. After 40 years and \$ 40 million in research and bear management , I expected a delisting plan that actually helped the bears. Instead we get proposals that cow-tow to special interests and decidedly non-wildlife priorities. It is disappointing that delisting looks like this. We can do better. For an animal that once ranged from Hudson Bay in Canada's northeast , all the way to the Pacific Ocean coast , and south as far as Guadalajara Mexico , the proposal to sustain the Grizzly on an island with a hard population ceiling (700 bears) and a hard population floor (500 bears) with nearly zero opportunity for that island population to expand and interchange with other grizzlies in the Rocky Mountains is patently absurd. I seem to recall back a couple decades ago that USFWS/ IGBST said they would endeavaour to bring in 'outside' grizzly bears to augment the GYE gene pool. I feel strongly that when the Grizzly was originally listed as Threatened under the ESA back in 1975 , the starting population of (maybe) 130 grizzlies then was not sufficient for genetic viability. I still feel that way , and scientists have not convinced me otherwise. Talk is cheap. Mitochondrial DNA Analyses is a young science and not the USFWS' strongest suit. Forty years is far too short of a genetic interval to be manufacturing conclusions. Besides, the Yellowstone Grizzly is NOT a distinct population or even a subspecie of Ursus arctos . That is a deceit; a biological accounting trick. Sentencing the Grizzly to remain behind an artificial map line as a Distinct Population in a Demographic Monitoring Area is a huge falsehood. 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This one aspect ---lack of landscape expansion opportunities for the Yellowstone bear and lack of genetic connectivity with other bear populations in the Northern Rockies --- is enough to declare Delisting to be null and void. They Yellowstone Grizzly has been branded a Distinct Population Segment strictly for political reasons, and expediency. I reject that. The agency should instead look at the Yellowstone bear both as a sustainable population AND a seed population. Yet Wyoming wants to cull bear numbers to keep them in a Goldilocks gated community of not more than 700 nor less than 500 bears, and that culling will be done by hunting and other human caused mortality , i e. " management actions". Why not relocate ' surplus' bears instead , or if a problem bear raiding the tack shed or apple orchard, put them on unsupervised probation in another state with their electronic GPS necklaces ? Wyoming Game and Fish bear managers have been playing " Musical Bears" for a couple decades now , trapping bears and hauling them to some other release point over the mountain . Sometimes the same bears. Recidivist grizzlies. We have maybe six drop points in all of Wyoming. If we were doing it right, the management agency would relocate bears to 60 drop points across five states. Again , in both directions. Please do allocate the funds to buy a LOT of GPS radio collars. I am not at all opposed to trophy hunting of Grizzlies in Wyoming. I can support that . But only if the agencies agree that expanding and sustaining a growing bear population outside the proposed Grizzly DMA occurs first. We all know that in Wyoming, Grizzly	FWS-R6-ES-2016-0042-	

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It is regrettable the attitude behind that is so baked in to existent wildlife technocrats and bureaucrats, and narrowminded stakeholders. It is almost as bad as the notion that bear biologists and bear managers actually believe they know bears. They...do...not. USFWS and the IGBST cannot justify delisting the Grizzly by saying it has recovered enough to survive the challenges it faces. We all agree there are a good number of bears...600...700...maybe more , maybe less. The problem is the bear's best food supplies in the core area of Yellowstone Park have collapsed...Cutthroat trout and Whitebark pine seeds. The gross supply of ungulate meat is in shorter supply inside Yellowstone as elk numbers decline. Outside the Park in the Absaroka Range alpine scree slopes the Army Cutworm moth larva are diminishing rapidly due to threats from pesticides and the GMO crop cycle in the lowlands and agribusiness areas of the Midwest . Yellowstone grizzly are becoming Absaroka grizzly and preying on more elk calves, and more livestock. Because of all this, the bears are spreading out , and actual bear density is decreasing over units of public lands. What seems like more bears out on the fringe of the GYE and the proposed DMA are bears that are searching further and wider for food sources. Bears have been spreading out since the early 2000's , and the population number probably peaked in about 2006 . The notion advanced by the IGBST that grizzly's " Omnviory " , the ability to eat a wide variety of vegetation in lieu of less animal protein , is a deception. Grizzlies want meat. Plants are a supplement but not a substitute in the bear's preferred diet. Would you as a human omnivore enjoy being forced to eat mostly salads and give up beef, chicken , pork , fish --- your meats ? Having to work harder and further afield for food is a big challenge to grizzlies, but the real drawdown of bears has been human caused mortalities. We've been killing 50 bears a year for some time...an alarmingly high percentage. The Whitebark pine seed crop has been thin ...not for lack of trees , but because of climate changes and the alien exotic blister rust. BEars simply cannot find the quantity of pine nuts they were having 15 years ago, and the situation is getting worse. When all the factors concerning the bear's food supplies start compounding and cascading, the result is bears coming into conflict zones with humans and their guns. The population dynamic of the Yellowstone Grizzly is at a tipping point, just at the time the humans want to ratchet up all the negative mortality factors affecting bears. The Delisting proposals are designed to do one thing well: reduce bear numbers. And that's about all it does. The IGBST has deluded itself into thinking they have succeeded in recovering bears strictly by the numbers , when in fact the bears are in more danger now than they have been at any time since they were listed back in 1975. It's been a mark of shame that the raw data gathered by the IGBST and their tight circle of researchers has not been fully disseminated to qualified third parties for peer review and analysis. The so-called " Best Available Science" produced by Chris Servheen et al and the IGBST has been built to a conclusion with data massaged and computer models tweaked until it all fits the preconceived political outcome of fabricating bear numbers and management scenarios that appear to show a recovered, feisty, expanding bear population. It all borders on fraud. Besides, it's not about bear numbers , it's about bear habitat. And that is the other Achilles Heel of the proposed grizzly delisting proposal and State plans. There is no provision for sustaining critical grizzly bear habitat requirements. Nothing in the proposals will implore the Forest Service, the BLM , or States to manage for bear habitat. Those agencies will automatically without remorse defer their decisions on behalf of special interests and human stakeholders perceptions. The Grizzly can look forward to more habitat fragmentation and decline of lifestyle should delisting proceed as planned. Forty years ago when the bear was listed under the ESA, you would not have been able to find ten scientists anywhere in the USA who would tell us that Global Climate Change would be a serious challenge in decades to come. Fast forward to today , and we cannot find ten scientists who disagree that Global Climate Change is not a force majeure to be reckoned with ...in every location on the planet from below sea level to the crest of the Himalayas, on all continents. The Yellowstone Grizzly is already adversely affected by climate change , and it's not going to get better in the lifetimes of anyone reading this. Which is why strong habitat protections and enforced regulations of landscape scale issues are paramount. Too bad none of that is in the delisting proposal . The Yellowstone Grizzly's survival into the next century depends on us making the right decisions today . The Great Bear must be allowed to disperse into several surrounding states from the Yellowstone core. That dispersion must be both natural , without undue impediments. And where and when necessary we humans must relocate some numbers and demographics of bears further afield and return virile bears to the core to replenish the gene pool. I see little to nothing in the US Fish and Wildlife's intentions or the state of Wyoming's draft grizzly management plan that would guarantee the survival and virility of the Grizzly Bear in the face of the challenges it faces. I see a People Plan and a whole lotta delusional science, and some deleterious agendas at work disguised as " management". What I do not see is a genuine Grizzly bear Recovery Plan going forward that is actually based on bears, as one would think it should be. Therefore, management cannot be turned over to the States, and Fish and Wildlife as stewards of Endangered Species must retool their thinking a produce a Grizzly bear sustainability plan that puts the bears themselves at the top of the priorities. I reject the proposed Grizzly bear Delisting for all these reasons stated here, and more. Sincerely ; Dewey Vanderhoff Cody Wyoming - submitted electronically May 10 , 2016	5487-A1.rtf	

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The Greater Yellowstone ecosystem (GYE) is an island, surrounded by private and even public lands that hold threats to the grizzly’s recovery. The grizzly is a wide-roaming species; it cannot recover on an island. The proposal does not adequately provide for needed connectivity between the GYE and other ecosystems. The Selway-Bitterroot must be occupied before the Yellowstone grizzly is delisted. The Bitterroot is the pathway to the Northern Continental Divide and Cabinet-Yaak ecosystems. The grizzly occupies less than 2% of its historic range and populations in the GYE and NCDE are paltry compared to historic levels. Connectivity, both habited and genetic, needs to occur at the landscape scale before the grizzly can be safely delisted. Demographic connectivity areas need to be identified and people educated to respect the grizzly. Without connectivity, there is no recovery.	Factor A	Comments on Yellowstone Grizzly Delisting To: Docket No. FWS-R6-ES-2016-0042 May 10, 2016 The grizzly is an icon, a monarch representing wildness, individuality and strength. Its pending recovery is a testament to these qualities and to effective protections of the Endangered Species Act. The American taxpayer has invested \$100’s of millions bringing back this magnificent species from the threshold of extinction. However, recovery while promising remains tenuous. Delisting of the Yellowstone grizzly bear is premature. To delist now is to waste the enormous trust and taxpayer dollars the American people have placed in the U.S. Fish and Wildlife Service and the good work of scientists and other employees. Two perspectives form rationales for maintaining ESA protections for the grizzly; one based on the role of the grizzly as the top predator on the landscape. The other is the grizzly’s vulnerability in the face of human development and climate change. The Greater Yellowstone ecosystem (GYE) is an island, surrounded by private and even public lands that hold threats to the grizzly’s recovery. The grizzly is a wide-roaming species; it cannot recover on an island. The proposal does not adequately provide for needed connectivity between the GYE and other ecosystems. The Selway-Bitterroot must be occupied before the Yellowstone grizzly is delisted. The Bitterroot is the pathway to the Northern Continental Divide and Cabinet-Yaak ecosystems. The grizzly occupies less than 2% of its historic range and populations in the GYE and NCDE are paltry compared to historic levels. Connectivity, both habited and genetic, needs to occur at the landscape scale before the grizzly can be safely delisted. Demographic connectivity areas need to be identified and people educated to respect the grizzly. Without connectivity, there is no recovery. Within the GYE, climate change is eating away at the whitebark pine, the preferred food source of the grizzly. This nutrient rich food is particularly important for females, the slowest reproducing mammals in North America. Other sources such as army moths and a range of berries are similarly vulnerable to climate change. Climate change also means less reliable snowpack and earlier emergence from the den leading to a longer non-denning season during which the grizzly needs food. While the grizzly is resourceful and as the top predator, capable of substituting other foods, the effects of the decline in whitebark pine cannot be certain since not enough science has been done or time lapsed to accurately assess changes such as fecundity rate and body weight. Observations of these changes could lag years or decades behind. Just as American’s have gotten bigger, though not necessarily healthier due to increased protein, the grizzly too can mask nutritional deficiencies as it relies more on meat based foods. In addition to unknown and untested effects of changes in a full spectrum of nutritional values, securing these meat-based sources presents increased risks to the grizzly. Access to meats whether by livestock predation or attraction to the scent of a fresh elk carcass comes with human conflict, and in this the grizzly is the more vulnerable. In recent years grizzly population growth has stagnated. More cubs and yearlings are dying. In 2015, there were 60 grizzly mortalities in the GYE as a result of human conflicts and other interactions. This is clearly not sustainable. It could throw any calculated average mortality formula out of the delisting ballpark. These need to be recalculated given the increase in mortalities in 2015. At this point, landowners and state agencies are getting “trigger-happy” and the mortality rate in 2016 could be as high or higher. The prospect of delisting makes it hard for many to hide their absence of tolerance and they may not be able to control themselves. People and bears can co-exist but many do not know it, because of tolerance of political hostility towards these magnificent creatures. The proposed delisting does not adequately address ways to mitigate the conflict and underestimates the virulence with which many, though not all, in the livestock industry perceive the grizzly and other predators. The FWS has only to look at the recent wolf delisting to get the picture of what awaits the grizzly. Since the Rocky Mountain Gray Wolf was delisted in 2011, its population has declined from a minimum of 653 wolves to 527 at the end of 2015. That is a decline of almost 25 percent, even in a rapidly reproducing species as compared to the grizzly. This drastic drop in population and disregard of the wolf’s ecological role on the landscape is intentional. I personally have testified before numerous committees of the Montana legislature in the last two sessions. I also have testified at MT Fish Wildlife and Parks hearings. The political vitriol for the wolf is repugnant. Montana law has made it easy to hunt, trap and kill wolves, extended wolf-hunting seasons into spring when mothers carry their unborn, increased wolf “bag” limits, instituted practices that strip fair chase hunting of any meaning, and allows landowners to kill a wolf at “perceived threat”. As bad as Montana is, Idaho is worse: There, entire wolf packs are aerial gunned in remote areas, professional hunters are hired to kill wolves in designated wilderness, and the budget for state sanctioned killing of wolves is increasing. FWS is lying to itself and the American people, if it doesn’t acknowledge that a similar fate awaits the grizzly upon delisting. If the Yellowstone grizzly is delisted, FWS can count itself as an accomplice. The proposed plan accepts a smaller population. ostensibly based on science. Yet. it has not adequately factored in the political vitriol as	FWS-R6-ES-2016-0042-5542-A1.docx	

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		be taken as an example. The proposed plan accepts a smaller population, certainly, based on science; yet, it has not adequately restored in the period. It has been evidenced by delisting of the Rocky Mountain Gray Wolf. Based on the wolf example, delisting of the Yellowstone grizzly is nothing short of a license to kill, in more ways than the proposed trophy hunt. It is wishful thinking on the part of State wildlife management agencies so they can respond to political prodding by the powerful livestock industry and remove a “perceived threat” that puts them in the cross hairs. Grizzly bears are making a slow recovery thanks to protection of the Endangered Species Act. However, they remain vulnerable due to shifting food sources, isolation, an increase in preventable conflicts with hunters and livestock, and an hostile political climate. All of these issues need to be addressed prior to delisting. Now is NOT the time to strip the grizzly of ESA protections. The perceived recovery is too tenuous. Delisting will reverse any hard fought and expensive gains. The ESA and the FWS still have more work to do. Please do your work and do NOT delist. Submitted by, Claudia Narcisco 5607 Gharrett Ave.		
After hunter harvest, illegal kills, administrative removals, removals for human protection + livestock conflicts and roadkills - How much is left for natural selection to work with and	Factor B	. Â· ex, Public Comments Processing Attn: Docket No. FWS-R6“ES-2015-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. 'Tlâ€”I@2â€”E: [5 /\â€”BsÂxi.uÂ-CQ_;Z Nm Â§iâ€”Z.. "LL;j] . jg] ggg 'P><Âc2S1' <bl:â€”Tl:\<E- Ecogsg AN; clout; esswÃ©gg jggit- E:] @ " Lt. S. ;;;,tts>t_ÂcF.Âc; f[(Â£â€”i-.. f' f@ 'B=-=Â·=â€”=â€” Â©Â©iz. gl \$S\$71 I~Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. }â€”ÂcEPÂcSÂ£,Qgiu 'I D E.-- br.l'[Z 4;-[5 glu ZLLV gÃ©glg vu ng [Hi guicrnyn} gwrluguygi my mg M0 6 Z; g gy we cr. CONrJÂ£.cTc,0 Âxlr ,l;{&\$;}1l;[EM [C gow gig J5 egg/cg;) , Ai-Jâ€”O A; ?0@vcNrzvM <rF gÃ©ggf gggc/=t> gf ALwvJE0 IQ ru gz 5-scw/lj â€” E rrrgggq; . 5 r,gg.J Hm L c U; Yifi Q ([546 g Q . gcgccica ll QE BRC-NAA/Â· Nâ,-7~Public Comments Processing Attn: Docket No. FWS-R6-ESâ€”2016-0042 U.S. Fish and Wildlife Service VIS:BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. .. _j l 74/ /114 4iAl AÃ©Ã© Ka, wz. @23- we /44224 x4â€”T1; ..1 1. ul, Â·Â· /&Z6Dq zu .4 11 JL.;} A1 Â»Â· AJ r . # i d'/4 7 Âc , _ 1 / / Â·Â·â€”Â·- I . {J Q,. AQAM.4 _Â» rz, ro i,I v JMX . â€” â€” ;. new ,.. r' .4*:.; (H A _ M I if In;Â» â€” â€” Â© mz /0 I Âx/me H,/1... F A./n. Al _ 1 â€c,Â» , zi ,Â» mi;; _ ' . rd;? _ Â» Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. l " â€” r r 1 l â€” *4*%/ 14 llÂ· A Â· 5 ' l . , â€” Â» G, r '	FWS-R6-ES-2016-0042-	

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livestock conflicts, and roadkills - How much is left for natural selection to work with and maintain important characteristics of grizzly bears?	Factor D	ipidrll mobil E r' â€˜ . A l lj 'YL V pi zazzF, "" JI ...L.' .Â»:id . Lia @% __ rw/III' *1 / P IÃ© gtzÃ©gztl~IÃ·` iâ€œe` â€˜`-â€˜"Ã· ..â€˜â€˜â€˜â€˜ iv Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife SenrlceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Serviceâ€™s proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I lgfm gm {he viog ^/L Â¸L www Aer 0 t/kskg 5 ok @ ul/All Eg Â· --`[ Avi/\ Qkggg gm; Qwvxeg ln a OI `kfk â€˜ LAAAQY -= AA \\A(Â· ;* â€œ â€™ ' A V\ Q~` Q' Q .i.31,_T Public Comments Processing Attn: Docket No. FWSâ€™R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. ggnii-L\r' l Â· _ Â· Â¸ J â€œâ€˜l V l l i Public Comments Processing Q) Attn: Docket No. FWS-R6-ES-2016-0042 *!â¸,-'H' Bâ€™™BI09.Y` U.S. Fish and Wildlife Service . szvs Leesburg Pike Gp ze mw. M T" Falls Church, VA 22041-3803 ( C; â€˜i 7 l S` _ iq Please accept my following comments on Fish and Wildlife Serviceâ€™s proposal to remove Endangered qcb _ . Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. lab? kv BB? glg? cov ygiew `F\â€™™ 15 QE dlweoc Qvizzlrf l0Q.:c;/ g remgv-ed EgÃ©kgiig gg Sgqdbg Ad". {Lrg; ggalwvcn ag still urccl -â€™"- vwgxe. Sjyglhlf igâ€œJ wevvc xi lg Q; ..~\0v~Q :v~Â·\l.P<.Jvâ€™™\`2r/xlj apt/{ om);. jg â€™B\\<JÂ¸=->%v h lmhifaljhi kaeav ygcwg ew [-eg @PE\glvÂ¸Â¸A Â· Pkifgg mgcwgrrdcmyg â€™zÂ·Â»~.dL 2-No Lo uglggitq gm c.Â¸ 0 vypm~~ _ s -â€™ . 3% Public Comments Processing Attn: Docket No. FWS-R6â€™E5-2016-0042 U.S. Fish and Wildlife SenriceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. â€™ 5 , 1 , l , â€œ `Â· gÂ».._n :.1...- 1 a V5l â€œ. KI O Â· E, .Â· nv â€™ 0 & AAA O1 Â· â€™ â€™ ' lazaxs La 4; .1 .. qqoue-. 1 L.: &6Â¸4Y`vuL,â€™iÂ¸`Ejofl	5663-A1.pdf	
Excessive, Unsustainable Mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection of the Threatened and Endangered Species act. Removing T&E protection and placing it in the	Factor B	On l\larch 11. 2016 the US Fish and Wildlife released a proposed rule in the Federal Fiegister (vol. 81, No. 48, pp. 13174 - 13227) for, Fiemoving the Greater Yellowstone Ecosystem Population of Grizzly Bears From the Federal List of Endangered and Threatened Wildlife; Proposed Fiule. Herein referred to as The Fiule. Dr. Christopher Servheen, Grizzly Bear Fiecovery Coordinator, U.S. Fish and Wildlife Service is lead author and primary contact for The Fiule.l\ly name is Kathryn Iverson, resident of Edina, l\lN. l\ly husband and l own property bordering the Northeast entrance to Yellowstone National Park. We fish, hike and camp in the Greater Yellowstone ecosystem. We have observed significant changes in this area, including huge die- offs of pines, (you can see the brown trees stretching across mountainsides, seeing evidence of warming waters in trout streams and lakes (algae blooms where none ever existed), as well as personally fishing at Yellowstone Lake with my grandsons, where we saw the tonnage of lake trout that are infiltrating Yellowstone Lake, and outcompeting the native cutthroat trout. Knowing that the grizzly bear is dependent on these ecosystems for survival, l urge the U.S. Fish & Wildlife Grizzly Bear Coordinator to share me deep concerns about delisting the Grizzly Bear from the Greater Yellowstone Ecosystem population. Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Fiule cavalierly dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. Carrying capacity The Fiule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Fiule). An alternative hypothesis that is not considered in The Fiule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement	FWS-R6-ES-2016-0042-	

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hands of the three states of Idaho, Montana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered.	Factor B	for "best science" as required by law.Excessive, Unsustainable Mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection of the Threatened and Endangered Species act. Removing T&E protection and placing it inthe hands of the three states of Idaho, I\lontana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Genetic Viability The Greater Yellowstone grizzly population is isolated from all other grizzly populations (pp. 13190- 13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly population is seriously flawed and violates the requisite principle of "Best Science.â€™ Climate Change Impacts The impact of climate change on Yellowstone's grizzlies is summarily dismissed in The Rule (p. 13197, p. 13200), by the statement, "I\lost grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the blithe statement that, 'grizzly bears are adaptable, they' do just fine,' with little or no supporting evidence. Population Estimates Accurately estimating the number of bears in a large, rugged area like the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review. Scientific Accountability The IGBST has been less than transparent about making taxpayer funded data (which they have maintained an exclusive monopoly) available for scrutiny by the larger scientific community. All raw data on grizzly bears collected by government agencies should be made available to independent scientists. In view of the wide disagreement about delisting decisions, the USFWS should establish a review panel of independent, academically qualified scientists who are not involved in current grizzly bear research in the GYE.~	5047-A1.pdf	
Bears seeking new territory leave the protections of the national parks & be subject to hunting, taking them out of the gene pool. There are resources for the bears, & ecosystems to support them, but the bears will never get there if we allow hunting	Factor B	YP'ziÃ©science for a changing world Fomxcmc Bumvion or Noam AMuucAu Bums David J. Mattson P.O. Box 5614, BLD 24 Southwest Biological Science Center Flagstaff, AZ 86011-5614 Colorado Plateau Research Station Phone: 928-556-7466 x 245 Northern Arizona University Email: David Mattson@usgs.gov Predation on Land-Dwelling Prey Even though all three North American bear species can be predators, the grizzly bear is more likely to kill larger terrestrial prey; either because of opportunity (compared to polar bears) or aptitude (compared to black bears). An adult grizzly is large enough to kill most adult ungulates, and equipped with claws, teeth, and power sufficient to deliver a killing blow. I\leat's ready digestibility also means that the typical bear will reap considerable rewards from predation. Bears locate larger land-dwelling prey, such as deer, elk, and moose, by a variety of methods and with varied intent. A certain number of encounters with potential prey are strictly by chance, apparently without deliberate stalk or search. This is typified by one incident where two grizzlies approached some elk behind a blind rise, without either species being aware of the other's presence. However, as soon as the elk came into sight, one of the bears lunged after them, but without success. This unfruitful result probably characterizes the vast majority of these chance encounters, however there are enough recorded kills in rolling terrain or otherwise visually opaque conditions to suggest occasional success under similar circumstances. On the other hand, the majority of observations suggest that both black and grizzly bears most often encounter their prey either after a deliberate search, characterized by movement in the direction of the hoped-for kill, or, with even greater forethought, by putting themselves in areas with concentrations of vulnerable prey. Elk and caribou calving grounds or traditional caribou river crossings are good examples of such areas where, either because of extreme young age, the preoccupations of birth, or the mass confusion of swimming animals, otherwise elusive ungulates become easy prey. This is most dramatically borne out by several graphic descriptions of observers such as Adolf I\lurie, Harry Reynolds, Kerry Gunther, and Steve and I\larilyn French, of contemporaneous pursuits, kills, and confrontations by grizzlies concentrated on calving grounds in Alaska and Wyoming. Bears clearly use all of their senses	FWS-R6-ES-2016-0042-0513-A3.pdf	

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		to track down prey. However, most observations suggest a prominent role for olfactory and audio cues. Bears have often been observed following scent trails associated with potential prey, sometimes for miles, or more convincingly, been seen killing calves at the culmination of a complex search mostly with nose to the ground. There are other phenomena that argue anecdotally for the prominence of hearing in tracking down meat. A number of hunters bugling for elk have surprised themselves by soliciting the apparently predatory interest of a grizzly bear. Concordantly, there is a consistently observed tendency world-wide for increased bear predation on both bull elk and bull moose during their fall ruts. Bears also seem to be attracted to the sound of gun-fire during the hunting season, one can only suppose with the intent of scavenging the gut pile and other remains of a hunter's kill. Although this likely orientation towards sound has not been conclusively demonstrated, it remains an intriguing possibility worthy of further study. Bears can chase down prey in open country, and are more successful at this tactic after separating a young calf from a cow-calf herd. Capture usually occurs after the pursuing bear cuts the corner on a fleeing calf that has been foolish enough to turn. However, most successful bear predations are not the result of long pursuits, but rather the result of a short-range rush either from ambush or after a stalk. Given the relative slowness of bears, at least compared to most wild ungulates, there is a distanceForaging Behavior ofBears . Mattson 2 at which this rush is more likely to be successful or, if not, then terminated. A number of records by different observers in different areas suggest that this "optimal" distance is around 20-50 m. Without the aid of mitigating conditions or tactics, it would be difficult for a bear to get this close to a reasonably alert and healthy ungulate, and so it should be no surprise that most kills are associated either with cover, conditions that hinder prey mobility, or the afflictions of exhaustion, disease, or raging sexual hormones in their prey. Thus, many documented predations have been in or near the edge of willow thickets and dense timber, often near running water; presumably under conditions that facilitate the unobserved approach of a predatory bear. Other predations occur on forest game trails, often as the prey negotiates deadfall or a small draw; under conditions where temporary imbalance or distraction would favor a successful ambush. Otherwise, bear researchers throughout the northern hemisphere have noted the remarkable success of bears preying upon winter-weakened ungulates in spring snow conditions. Surface crusts form that can support the weight of a broad-footed bear but not a larger-bodied ungulate such as an elk, moose, or muskox. Under these conditions the delivery of a killing bite is more often a constraint than over-taking the prey. Similarly, exhausted and/or hormonally-deluded bulls seem to make relatively easy bear prey during and after the fall ruts. One extraordinary story from Siberia recounts a brown bear that lured a rutting bull moose into a willow thicket by imitating the bull's mating roar. Grizzly bears kill land-dwelling prey primarily one of two ways. I\lost often they maneuver to approach over the back, after which they grab the animal around the rib-cage and, if successful, deliver a killing bite to the back of the neck or skull. A bite to the small of the back may be a prelude to this finishing move, or an animal that escapes the first attempted neck bite may be severely wounded on the flanks by the bear's claws as they are disengaged from their hold. An approach from the rear is also the logical consequence of a chase, and on occasion the bear may use its weight to collapse the hind- quarters of an animal that has just been caught. The next most common kill technique involves a bite to the nose and face that at least paralyzes and possibly kills the animal. Either way, the animal does not offer subsequent resistance. Interestingly, there are only a few reports of bears delivering killing or debilitating blows with their paws, and in most cases their paws come into play for such things as pinning down a newly-captured calf or grasping larger prey to facilitate delivery of a killing bite. Bears are able to consume between 12 and 40 kg of fresh meat in a day. However, consumption is not indiscriminate and typically reflects marked preference for some carcass parts. Almost universally, the most favored or at least first eaten portion of a female is the udder. After that, most bears eat the brisket and adjacent rib meat or the meaty proximal part of the front legs. I\lost carcasses are cleanly eviscerated soon after they are killed or found by a bear, with the heart, liver, and lungs selected for priority consumption. The skin, hair, rumen, and stomach are the most consistently unused soft parts of a carcass. In fact, a more-or-less neatly peeled off hide is one of the more diagnostic signatures of bear involvement. Bears are also one of the few consumers that can readily crack the major leg bones of a larger ungulate in pursuit of the marrow. Some bears even get into the habit of cracking the skull so that they can consume the brains. There are other features that distinguish carcass use by grizzly bears. If there are enough edibles to warrant the investment, a bear will typically bury the entire carcass or selected parts of it by scraping adjacent soil and litter over the tidbit with its front paws. Presumably this inhibits decomposition and the dissemination of scent that might attract competitors. As further sign of ownership, you might even find a bear sprawled directly on top of a carcass, attempting to rest while at the same time prevent pilfering by other scavengers. A bear may also move an intact or even partly consumed carcass to a spot more to its liking. If the carcass is not fresh, a drag trail of shed ungulate hair will connect the new carcass location with the rumen contents left at the original site of death. In addition, there are often bear beds nearby and a bear trail leading to the nearest available water (an apparent necessity when consuming such a protein-rich diet). As a final note on this type of predation - grizzlies exhibit marked preference for different sizes and species of ungulates. They are least likely to attack very large herd-dwelling animals that rely upon aggression for predator defense, epitomized by bison. Among the larger ungulates, they seem most likely to attack moose, presumably because of a solitary forest-dwelling existence that lends itself to ambush. However, within any given medium- to large-bodied prey species, bears preferentially prey upon young animals, especially the highly vulnerable neonates. On the other hand, although they are not		

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Consider bears 399 & 610. Both are critical members of the species. Mother bears & cubs spend more time near roads than the males, which puts them at greater risk of being killed by hunters. 399 & 610 are used to people, & will not be wary of hunters. 399 attracts visitors to Grand Teton in droves. Tourist dollars will be lost when 399 is killed. Jackson outfitters threaten to target 399 specifically for her fame, & would likely lure her out of Grand Teton in order to kill her, like Cecil the Lion	Factor B	YP'ziÃ©science for a changing world Fomxcmc Bumvion or Noam AMuucAu Bums David J. Mattson P.O. Box 5614, BLD 24 Southwest Biological Science Center Flagstaff, AZ 86011-5614 Colorado Plateau Research Station Phone: 928-556-7466 x 245 Northern Arizona University Email: David Mattson@usgs.gov Predation on Land-Dwelling Prey Even though all three North American bear species can be predators, the grizzly bear is more likely to kill larger terrestrial prey; either because of opportunity (compared to polar bears) or aptitude (compared to black bears). An adult grizzly is large enough to kill most adult ungulates, and equipped with claws, teeth, and power sufficient to deliver a killing blow. I\leat's ready digestibility also means that the typical bear will reap considerable rewards from predation. Bears locate larger land-dwelling prey, such as deer, elk, and moose, by a variety of methods and with varied intent. A certain number of encounters with potential prey are strictly by chance, apparently without deliberate stalk or search. This is typified by one incident where two grizzlies approached some elk behind a blind rise, without either species being aware of the other's presence. However, as soon as the elk came into sight, one of the bears lunged after them, but without success. This unfruitful result probably characterizes the vast majority of these chance encounters, however there are enough recorded kills in rolling terrain or otherwise visually opaque conditions to suggest occasional success under similar circumstances. On the other hand, the majority of observations suggest that both black and grizzly bears most often encounter their prey either after a deliberate search, characterized by movement in the direction of the hoped-for kill, or, with even greater forethought, by putting themselves in areas with concentrations of vulnerable prey. Elk and caribou calving grounds or traditional caribou river crossings are good examples of such areas where, either because of extreme young age, the preoccupations of birth, or the mass confusion of swimming animals, otherwise elusive ungulates become easy prey. This is most dramatically borne out by several graphic descriptions of observers such as Adolf I\lurie, Harry Reynolds, Kerry Gunther, and Steve and I\larilyn French, of contemporaneous pursuits, kills, and confrontations by grizzlies concentrated on calving grounds in Alaska and Wyoming. Bears clearly use all of their senses to track down prey. However, most observations suggest a prominent role for olfactory and audio cues. Bears have often been observed following scent trails associated with potential prey, sometimes for miles, or more convincingly, been seen killing calves at the culmination of a complex search mostly with nose to the ground. There are other phenomena that argue anecdotally for the prominence of hearing in tracking down meat. A number of hunters bugling for elk have surprised themselves by soliciting the apparently predatory interest of a grizzly bear. Concordantly, there is a consistently observed tendency world-wide for increased bear predation on both bull elk and bull moose during their fall ruts. Bears also seem to be attracted to the sound of gun-fire during the hunting season, one can only suppose with the intent of scavenging the gut pile and other remains of a hunter's kill. Although this likely orientation towards sound has not been conclusively demonstrated, it remains an intriguing possibility worthy of further study. Bears can chase down prey in open country, and are more successful at this tactic after separating a young calf from a cow-calf herd. Capture usually occurs after the pursuing bear cuts the corner on a fleeing calf that has been foolish enough to turn. However, most successful bear predations are not the result of long pursuits, but rather the result of a short-range rush either from ambush or after a stalk. Given the relative slowness of bears, at least compared to most wild ungulates, there is a distanceForaging Behavior ofBears . Mattson 2 at which this rush is more likely to be successful or, if not, then terminated. A number of records by different observers in different areas suggest that this "optimal" distance is around 20-50 m. Without the aid of mitigating conditions or tactics, it would be difficult for a bear to get this close to a reasonably alert and healthy ungulate, and so it should be no surprise that most kills are associated either with cover, conditions that hinder prey mobility, or the afflictions of exhaustion, disease, or raging sexual hormones in their prey. Thus, many documented predations have been in or near the edge of willow thickets and dense timber, often near running water; presumably under conditions that facilitate the unobserved approach of a predatory bear. Other predations occur on forest game trails, often as the prey negotiates deadfall or a small draw; under conditions where temporary imbalance or distraction would favor a successful ambush. Otherwise, bear researchers throughout the northern hemisphere have noted the remarkable success of bears preying upon winter-weakened ungulates in spring snow conditions. Surface crusts form that can support the weight of a broad-footed bear but not a larger-bodied ungulate such as an elk, moose, or muskox. Under these conditions the delivery of a killing bite is more often a constraint than over-taking the prey. Similarly, exhausted and/or hormonally-deluded bulls seem to make relatively easy bear prey during and after the fall ruts. One extraordinary story from Siberia recounts a brown bear that lured a rutting bull moose into a willow thicket by imitating the bull's mating roar. Grizzly bears kill land-dwelling prey primarily one of two ways. I\lost often they maneuver to approach over the back, after which they grab the animal around the rib-cage and, if successful, deliver a killing bite to the back of the neck or skull. A bite to the small of the back may be a prelude to this finishing move, or an animal that escapes the first attempted neck bite may be severely wounded on the flanks by the bear's claws as they are disengaged from their hold. An approach from the rear is also the logical consequence of a chase, and on occasion the bear may use its weight to collapse the hind-quarters of an animal that has just been caught. The next most common kill technique involves a bite to the nose and face that at least paralyzes and possibly kills the animal. Either way, the animal does not offer subsequent resistance. Interestingly, there are only a few reports of bears delivering killing or debilitating blows with their paws, and in most cases their paws come into play for such things as pinning down a newly-captured calf or grasping larger prey to facilitate delivery of a killing bite. Bears are able to consume between 12 and 40 kg of fresh meat in a day. However,	FWS-R6-ES-2016-0042-0513-A3.pdf	

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		consumption is not indiscriminate and typically reflects marked preference for some carcass parts. Almost universally, the most favored or at least first eaten portion of a female is the udder. After that, most bears eat the brisket and adjacent rib meat or the meaty proximal part of the front legs. I\lost carcasses are cleanly eviscerated soon after they are killed or found by a bear, with the heart, liver, and lungs selected for priority consumption. The skin, hair, rumen, and stomach are the most consistently unused soft parts of a carcass. In fact, a more-or-less neatly peeled off hide is one of the more diagnostic signatures of bear involvement. Bears are also one of the few consumers that can readily crack the major leg bones of a larger ungulate in pursuit of the marrow. Some bears even get into the habit of cracking the skull so that they can consume the brains. There are other features that distinguish carcass use by grizzly bears. If there are enough edibles to warrant the investment, a bear will typically bury the entire carcass or selected parts of it by scraping adjacent soil and litter over the tidbit with its front paws. Presumably this inhibits decomposition and the dissemination of scent that might attract competitors. As further sign of ownership, you might even find a bear sprawled directly on top of a carcass, attempting to rest while at the same time prevent pilfering by other scavengers. A bear may also move an intact or even partly consumed carcass to a spot more to its liking. If the carcass is not fresh, a drag trail of shed ungulate hair will connect the new carcass location with the rumen contents left at the original site of death. In addition, there are often bear beds nearby and a bear trail leading to the nearest available water (an apparent necessity when consuming such a protein-rich diet). As a final note on this type of predation - grizzlies exhibit marked preference for different sizes and species of ungulates. They are least likely to attack very large herd-dwelling animals that rely upon aggression for predator defense, epitomized by bison. Among the larger ungulates, they seem most likely to attack moose, presumably because of a solitary forest-dwelling existence that lends itself to ambush. However, within any given medium- to large-bodied prey species, bears preferentially prey upon young animals, especially the highly vulnerable neonates. On the other hand, although they are not		
During this summer (2016) I would like you to survey all of the people coming in from around the world, who spent nearly half a billion dollars in communities around the park in 2015, how they feel about seeing this iconic predator hunted and killed for sport. I believe the outrage at the illegal killing of bear # 211 also known by the public as Scarface, is most telling of how we feel, but if that is not enough for the Service to listen too, then this survey that is attached, provided by the HSUS and WWA may make it clearer, how Americans really feel. Â The poll, conducted by Remington Research Group on behalf of The HSUS and WWA from April 7 through April 9, 2016, surveyed 3,087 voter participants. The survey was weighted to match expected turnout demographics for the 2016 General Election, with margin of error plus or minus 2.2 percent with a 95 percent level of confidence.http://www.humanesociety.org/news/press_releases/2016/04/opposition-yellowstone-grizzly-delisting-041216.html?credit=web_id738419534	Factor B	I live in Grizzly territory, and adamantly oppose the idea of delistingÂ the Greater Yellowstone Area (GYA) population of grizzly bears from the List of Endangered and Threatened Wildlife. Officials are expecting more visitors this year as the National Park Service celebrates its 100th anniversary. During this summer (2016) I would like you to survey all of the people coming in from around the world, who spent nearly half a billion dollars in communities around the park in 2015, how they feel about seeing this iconic predator hunted and killed for sport. Not harvested, but killed for sport. I believe the outrage at the illegal killing of bear # 211 also known by the public as Scarface, is most telling of how we feel, but if that is not enough for the Service to listen too, then this survey that is attached, provided by the HSUS and WWA may make it clearer, how Americans really feel. Â Grizzly bears are an iconic species, representing the natural beauty and magnificence in many of our country's last remaining wild spaces. This also holds true for wolves and bison and we have seen what has happened to both of these species since delisting. They are lured outside of the Park boundaries, and killed. The poll, conducted by Remington Research Group on behalf of The HSUS and WWA from April 7 through April 9, 2016, surveyed 3,087 voter participants. The survey was weighted to match expected turnout demographics for the 2016 General Election, with margin of error plus or minus 2.2 percent with a 95 percent level of confidence. http://www.humanesociety.org/news/press_releases/2016/04/opposition-yellowstone-grizzly-delisting-041216.html?credit=web_id738419534 The State has no funding in place to take over this program. The amount of time, energy and management to protect and enforce illegal hunting and poaching, is beyond comprehension, and Montana wildlife officials have announced, through their Â draft grizzly hunting regulationsÂ that, once approved, they would offer \$50 permits to local residents and \$1,000 permits for out-of-state hunters to shoot the bears.Â Â The state's grizzly hunting plan would be implemented if the bears are takenÂ off the federal endangered species list. This is outrageous, and telling of what Montana has in place for Grizzly bears, once delisted. Again, we have seen what our state has done and continue to do with our wolves as they kill more packs and individual wolves to satisfy sport hunters, trappers and the livestock industry. TheÂ UFWS tried to de-list grizzly bears in 2007 but environmental groups sued. In 2009, a federal judge in Montana ruled that Yellowstone grizzly bears should continue to be protected because not only were the safeguards promised by the USFWS unenforceable, but due to climate change, bears were losing a major part of their diet due to white bark pine trees dying off. Now in 2016, we are all knowledgeable that this is happening, and the climate change predicted, has happened. Denying this fact in your Draft Proposal, does not change reality. As such, you can be assured that litigation will once again be forth coming. In closing, I strongly agree with all points presented in this letter, presented by Jane Goodall and signed by prominent scientists and knowledgeable bear experts that have been delivered to Sally Jewell, Secretary U.S. Department of the Interior and Dan Ashe, Director, U.S. Fish and Wildlife Service. https://drive.google.com/file/d/0B7Ec-KrsWzt4Q0NnWlVrV3JqU1k/view_GB-ScientistFinal5-5-16.pdf	FWS-R6-ES-2016-0042-5173-A1.doc	

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Hunting: There is no rational reason the hunt Griz again. I have hunted in the past and do support hunting. But not for Grizzly bear. They reproduce too slowly and there are too many human caused threats present and unforeseen future ones to allow for the states to hunt them.	Factor B	5-9-16 To whom this does concern, Please accept these comments on the premature Grizzly bear delisting that is proposed the USFWS. I am very supportive of delisting Grizzly bears if the population, habitat and food sources are secure to allow for populations to reach historic levels and fill historic habitat . As it is now the USFWS and states are satisfied if the population is well below the historic population of 50.000 Grizzly bears. The listing is unwarranted because the population to be unlisted is small and does not include the historic range of the bears. The piecemeal delisting in one small area of the historic range will not truly recover the species. Griz should not be delisted around Yellowstone National Park when Grizzly bear are not present or struggles to survive in 98% of their historic range. Canada has for many years been looked at as a genetic supplier for many species into the US. The population of Grizzly in Canada is also decreasing due to loss of habitat , roads, oil and gas development, mining and hunting, housing, ranching, farming, etc. These are the same pressures and demands that the US puts on historic Grizzly bear habitat. This delisting will create an island with delisted bear that will become inbred as wildlife corridors have not been determined and protected from fragmentation, road building and human growth in valleys as is easily seen in the included maps. Until hard management strategies are in place to limit human activity (hunting of Grizzly, road building, climate change, trash storage, grazing, weeds, logging, human development of valleys and a basic understanding that Grizzly bear do not have other places to live) any delisting will be the end of this top predator . People need to understand that they live in Grizzly bear habitat out of choice. Grizzly bear do not have this choice of where to live . People need to stop being so self-centered and become educated on how people must change their behaviors to accommodate the needs of Grizzly bear to survive in the long term. The USFWS needs to take on this challenge to educate people on the needs of Grizzly bears and actions that are required to enhance and enlarge places that grizzly bear can live in safety . Hunting: The hunting of Grizzly bear is unacceptable for any reason. The Grizzly bear need to have the same protections as Bald eagles where the eagles are delisted and people cannot hunt them. The states protection of Grizzly bear did not work in the past and will not work in the future without mandates from the USFWS that any future delisting will not allow for hunting until the population reestablishes historic populations of 50,000. A population of 600 Griz is too small to be a viable population. I doubt that the USFWS would consider at a population of 600 humans in the greater Yellowstone as viable if there were only 1200 ,+/-more humans in the lower 48 states. The reason a hunting ban is imperative is due to listening to a Montana Fish Wildlife and Parks employee saying “that deer populations are increasing in Montana and we hunt them. And the Grizzly bear will do fine hunting them too .” The mindset that Grizzly bear are like deer is ludicrous. Also whitetail and muley deer populations are doing fine in cities, but not so well in most of Montana. Blue tongue disease and loss of habitat are harming deer populations. Fish Wild and Parks treats predators differently than ungulates. If populations of wolves are not reduced to “acceptable” levels, the hunting season is increased and new hunting methods are allowed. This includes trapping, increase in numbers of wolves allowed by one hunter to take, silencers, etc. This is not done with deer and elk. FWP and federal trappers do not go out and slaughter a herd of elk or deer with aircraft because hunting targets were not met, they were a threat to cattle or they were too close to my cows. I fear tha t Griz will be treated as wolves since 600 bears is our target population to keep the Griz off the ESA and this is our target. We will allow for hunting, bear baiting, etc to keep bear at this population at all costs. Delisting of wolves has not gone so well in Wyoming and the mid-west, at least according to federal judges. Federal funding for Grizzly population surveys will stop after 5 years. Will it then be left up to the states to monitor Grizzly Bear? Is there a funding mandate placed on the states to monitor the Grizzly populations? Economics: There has been new economic information on the value of Grizzly bears for tourism. The study showed that Grizzly bear are an economic driver for tourism. Hunting Griz will hopefully create tourism boycotts. Disease: Due to the small population of grizzly bear, islands of bear habitat and global warming, it is possible that the Yellowstone population could be decimated with a disease that the bear would never recover from. 700 bear are too small of a population for long term survival. How does delisting now respond to issues of disease? Isolated populations: Unfortunately politics punched a hole in the ESA when Senator Testor put a rider on wolf delisting. Up until that point, whole populations needed to be at least stable growing throughout species historic range before delisting could happen. The delisting of pockets of Griz when the bear are not established in their historic range is shortsighted. How are the bear doing in the Cabinet Yaak. How will the bear do around Glacier long term when one looks at human development? What is the acceptable population numbers and habitat that the USFWS has determined for Griz to be delisted in the lower 48 states? Look at all of the human growth in the Madison, Gallatin and Paradise , Boulder and Redlodge Valleys. How does this growth allow for Griz to re-inhabit historic ranges? Food sources: The diet of Griz around Yellowstone NP has changed drastically. The bear have lost whitebark pine, cutthroat trout and moths as a major high nutrient food source. As a result their diet has needed to change. How will delisting these bear now protect future bear generations if they lose other food sources? Is there enough habitat and human tolerance for Griz that will allow for Griz to use new habitat for new food sources? How will delisting effect Griz if the bear take cattle on federal grazing leases? New threats: The new threats come from the same old major threat-humans. Without the ESA protections it will be difficult for policies to be put in place quickly to protect Griz. Look how long it has taken to establish viable Bull trout critical habitat? Habitat loss: Growth around national parks and wilderness areas are the fastest growing areas in the west. People want to live in nice places. Unfortunately griz do not have the latitude or ability to move to many places in the west and survive. They have been pushed in the past to places that people did not want to live. They were plains animals. I have included maps of population growth in the Flathead from 1970-2010 and these maps clearly show habitat loss. If federal lands are transferred to the states as some people want, how will this political action affect the viability of Griz?? Without ESA protections many shortsighted land management decisions will be made that will reduce habitat sui table for Grizzly bear. In the past even in the 1970s when food sources were bad for Grizzly bear, they could go down in the valleys and find food. With the conversion of the vallevs to housing and ranching the bear have lost this source of food in times of drought. As global warming continues. where is the habitat	FWS-R6-ES-2016-0042-5183-A1.docx	

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		What the conversion of the valleys to housing and ranching the bear have lost the source of food in times of drought. No great warming continues, there is the human set aside b the states to accommodate this top predator? I am amazed at the growth of humans and change o f wildlife habitat to human dominated habitat from highway building, human housing development, roads from log ging, weeds and the shorter winters in Idaho, Montana and Wyoming since the 1970s. When I project this growth forward, I really do not know where the griz will live in the future. Look at the map of the Flathead in 1970 and then 2010. The growth is impossible to ignore. This growth has happened throughout Griz habitat. The bear was listed in 1975 and look at the loss of habitat and how Montana finally was forced to stop hunting the bear in 1980? Now you want to leave it to the states to manage Grizzly bear ? Griz are not deer. Global warming: From 1978- 2000 there were over 30 more frost free days in Montana. It does not get down to -50F anymore. Forest fires and lower and less snow pack will be more common. How does delisting the bear now protect them in the future as their present habitat will be unrecognizable in 20-30 years? Hunting: There is no rational reason the hunt Griz again. I have hunted in the past and do support hunting. But not for Grizzly bear. They reproduce too slowly and there are too many human caused threats present and unforeseen future ones to allow for the states to hunt them. Look at Wyoming â€™s plan to only allow wolves in a small part of the state. Look at Idaho that says they are doing elk studies in the Frank Church River of no Return Wilderness with helicopters and it turns out it was only to hunt wolves? Look at Montana where wolf hunting rules are being relaxed and new manners of killing them is looked at ev ery legislative session? I do not trust these states to wisely manage Griz. Past hunting got the bear listed. While the public in general wants top predators on the landscape, local ranchers and hunters do not like top predators. Ranchers with federal grazing leases hate predators and will shoot more of them without federal protections. What will happen when a hunter wounds a bear and the bear gets pissed and starts killing people? Bear are not deer. There is no reason to hunt bear. It will encourage poaching, allow for ranchers and farmers to shoot bear on sight and unfortunately lead to the bearâ€™s eminent demise. Please do the right thing for future generations and stop the delisting of Grizzly bear until there are stable populations in the Frank Church and Selway-Bitterroot Wilderness Areas, the CM Russel, Washington, Idaho, Oregon and California(the bear is on their state flag). As you know top predators improve habitat for all species. Including humans. The piecemeal approach to Griz delisting is short sighted and will fail the species that the ESA was designed to help. Thanks for your time , Stephen Braun PO Box 5614 Whitefish, MT		
		Christopher D. Meyer 210 S. 3â€™ Street Livingston, MT 59047 @0 406-222-1558â€™aÂ· Â© 02* Public Comments Processing, ti? O Attn: Docket No. F U.S. Fish and Wildlife Service, MS: BPHC, ~Â©Â§"â€™Â© 5275 Leesburg Pike, Falls Church, VA 2204]-3803.May 7, 2016 Re: proposed rule that would delist Grizzl Bears in the Greater		

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Montana, Idaho and Wyoming have announced that if the grizzly bear is delisted in theGYE, they will allow trophy hunting of grizzly bears. Grizzly bears, however, reproduce extremely slowly. Trophy hunting of grizzly bears will reduce their populations and theirrecovery from such hunting will be extremely diiiicult, especially when they must also reckon with the aforementioned challenges from climate change and habitat destruction.	Factor B	yellowstone Ecosystem (GYE) To whom this concerns: I write in opposition to your proposal to delist grizzly bears in the Greater Yellowstone Ecosystem (GYE). The best available science and commercial data do not show that the GYE population of grizzly bears has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act. Your proposal depends heavily upon the conclusion that the population of grizzly bears in the GYE has increased. By itself an increase in population is an insufficient ground to delist a species when immediate threats to its survival are obvious and ongoing. Moreover, estimates as to the population of grizzly bears in the GYE must be viewed with tremendous skepticism because it is impossible to do more than roughly estimate their population. Crude population estimates should not be relied upon in deciding whether to st1Â-ip grizzly bears of protection that is essential to their survival. It cannot be denied that the protection of grizzly bears under the Endangered Species Act has been critical to their limited recovery. I also oppose the proposal to delist grizzly bears in the GYE because it flatly ignores the inconvenient but incontrovertible scientific evidence of serious ongoing threats to grizzly bears in the GYE. Climate change is a continuing threat to grizzly bears. Whitebark pine trees, as one example, have been decimated by mountain pine beetles, white pine blister rust, and climate change. It is a documented fact that whitebark pine nuts are an important food source for grimly bears in the GYE, yet their number and availability decline each year, putting increased pressure on grizzly bears. Fish, another important source of food for grizzly bears in the GYE, are also under severe pressure because of climate change. Ever smaller snow packs, the result of climate change, have meant increasingly warm stream temperatures that damage fish populations in the GYE. Trout, for example, thrive in cold water, but river and stream temperatures in the GYE are rising in step with climate change. These injuries to grizzly bearsâ€™ food sources will only increase because climate change, by all credible scientific estimates, will worsen in the coming decades. Climate change has also led to more forest fires, of increasing severity, that damagegrizzly bear habitat and put additional stress upon them. And as a direct result of climate change, grizzly bears emerge earlier each year from their dens and they are increasingly hardpressed to find food then. Climate change is not a passing phenomenon: the scientific consensus is that its impacts will worsen with the passage of time. The threat to grizzly bears from climate change is serious and will worsen in the coming decades. Yet another serious threat to grizzly bears in the GYE is habitat destruction. Every year new homes and developments are built in the GYE, forcing grizzly bears to relocate and further damaging their food sources. Habitat destruction is also a major threat because grizzly bears in the GYE are at great risk of becoming an island or isolated community. Grizzly bears in the GYE are indistinguishable from grizzly bears in other parts of Montana. Because grizzly bears travel substantial distances, delisting them in the GYE necessarily threatens grizzly bears from other areas, too, in Montana, Idaho, and Wyoming. As habitat destruction increases, it will become more difficult for grizzly bears in the GYE to connect with other grizzly bear populations, rendering them increasingly vulnerable to disease and genetic issues as an island community.We need not speculate about the impact of climate change and habitat destruction upon grizzly bears in the GYE. In recent years grizzly bear mortality in the GYE has increased, not decreased, because of climate change and habitat destruction, the accelerating destruction of food sources for grizzly bears in the GYE, and the mounting pressure upon them to find new food sources even at the risk of conflict with humans. Montana, Idaho and Wyoming have announced that if the grizzly bear is delisted in the GYE, they will allow trophy hunting of grizzly bears. Grizzly bears, however, reproduce extremely slowly. Trophy hunting of grizzly bears will reduce their populations and their recovery from such hunting will be extremely diiiicult, especially when they must also reckon with the aforementioned challenges from climate change and habitat destruction. For all these reasons I object to the proposal to delist grizzly bears in the GYE and urge you to reconsider your proposal. You are charged with protecting these magnificent animals and you should honor that responsibility. Thank you.Since ly, L J Christopher D. Meyer2	FWS-R6-ES-2016-0042-5688-A1.pdf	

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A prospective solution for the Northern Continental Divide is to allow a conservative hunting approach to harvest 25 bears annually. A grizzly license to hunt them would be appropriate. I feel \$50 would be adequate. A trophy fee of \$200 if a bear is taken would be another idea. Most of the serious hunters I know would not mind paying money to hunt and manage these beautiful animals. Montana sportsmen would feel their voice is valued and local residents would feel the relief as the bears become more wary. The fee income could steadily fund ongoing grizzly research and management.	Factor B	Please consider doing all in your power to complete the delisting of the grizzly bear in Montana. The healthy population existing in our area requires active management. I commend you on the strong recovery of this magnificent animal. I hunted as a young boy growing up in Montana. After high school, I attended college in Minnesota, staying a decade. Prior to 2003, I never saw a grizzly, since then I have seen many. In 2013, I ran into a griz in the Dupuyer Creek. When the grizzly investigator (Brian Lakes) and the game warden (Kuyn Kuka) accompanied me to the scene, four bears were on the elk carcass. A week prior, a friend and I experienced a close encounter with a sow and cubs in the Jones Creek of the Teton River. After spooking them away, we sat to eat a candy bar. My buddy was worried, but I wasn't. I expected them to act like hunted black bears and not quit running until they were over a mountain. After our snack, we walked a mile to sit down on the top of a mountain for lunch. Several hours later we came back down the trail only to find the bear tracks coming up. We followed the tracks in the snow and found the bears had only ran into the timber a little way, then followed us to the edge of the clearing where they lay down to watch. They waited there until we started back down before fading off into the timber. In 2014, my brother Lake Mellott was hunting with good friend and experienced outfitter, Kip DeBoo. Riding back into camp after the morning hunt, Lake watched as Kip, rifle in hand, opened the tent flap cautiously. They discovered a bear had entered the door and tore out the side. He climbed a tree and grabbed a sack of horse feed. His tracks in the fresh snow led a quarter mile down the trail into some timber. His trail fishhooked abruptly, turning back toward camp. As the three men tracked him up, a loud crashing sound signified his hasty exit. They found he had been laying where he could see the hunters approach while wolfing down as much feed as he could. The next day, they hunted in that direction and saw the same bear track on the trail as he hit up camp after camp while all the hunters were out hunting. A grizzly cub tore the porch off my house this summer. In September, Chase Dellwo, a local rancher and hunter was severely mauled by a bear. In October, a grizzly broke into a chicken coop a few miles from my house and ate all the chickens and ducks. I recently attended a grizzly management meeting held by the citizens of Choteau, Montana. Wildlife authorities were invited and did come. As the problem was discussed, your name was mentioned as the man with authority to make a change. A prospective solution for the Northern Continental Divide is to allow a conservative hunting approach to harvest 25 bears annually. A grizzly license to hunt them would be appropriate. I feel \$50 would be adequate. A trophy fee of \$200 if a bear is taken would be another idea. Most of the serious hunters I know would not mind paying money to hunt and manage these beautiful animals. Montana sportsmen would feel their voice is valued and local residents would feel the relief as the bears become more wary. The fee income could steadily fund ongoing grizzly research and management. Most sportsmen and women want to see the bears in Montana forever. Most ranchers do not hate the bears and want them exterminated from the face of the earth. A reasonable effort at managing people first, bears second would be welcomed by all. Would you please do what is within your realm of authority to help this along? Thank you for your time and consideration, Locke Mellott (612) 816 3203	FWS-R6-ES-2016-0042-5697-A1.pdf	
Grizzly bears have been quickly decreasing in numbers largely due to trophy hunting, and also loss of habitat due to development and other human activities. Moreover, wildlife hunting perpetuates a culture of violence and sends the harmful message that life has little value and that an entire species of animals is disposable. This harsh practice is also damaging to humans - grizzly bears and other wildlife have been shown to provide ecosystem services that benefit humans, which would gradually cease to exist as wildlife killing continues.	Factor B	From: Michal Rosenthal <dr_michali@yahoo.com> Date: May 5, 2016 at 2:49:55 AM MDT To: <Michael_Thabault@fws.gov> Subject: Please do not delist the Yellowstone grizzly Hello Assistant Director Thabault, I am writing in regard to the Fish and Wildlife Service (FWS) Proposed Rule: "Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife". Grizzly bears have been quickly decreasing in numbers largely due to trophy hunting, and also loss of habitat due to development and other human activities. Other factors are climate change, food scarcity, and genetic isolation. Moreover, wildlife hunting perpetuates a culture of violence and sends the harmful message that life has little value and that an entire species of animals is disposable. This harsh practice is also damaging to humans - grizzly bears and other wildlife have been shown to provide ecosystem services that benefit humans, which would gradually cease to exist as wildlife killing continues. For these reasons, I encourage you to retain protections of grizzly bears, provided by the Endangered Species Act. Thank you for your consideration, Michal Rosenthal	FWS-R6-ES-2016-0042-5716-A1.docx	

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Americans would never accept hunting of America’s bald eagle; hunting Yellowstone grizzly bears is equally unacceptable.	Factor B	We are writing to thank you for your leadership on climate change and to ask for your help: Yellowstone grizzly bears are in grave danger. Your administration has regrettably taken steps to strip the bear’s federal protections under the Endangered Species Act (ESA), Opening up a grizzly bear trophy hunt on the edges of Yellowstone National Park. Yellowstone’s bears are a remnant and isolated population. They must be allowed to wander safely Outside Of Yellowstone National Park. Americans would never accept hunting Of America’s bald eagle; hunting Yellowstone grizzly bears is equally unacceptable. To make matters worse, America’s great bears face the same looming threats as many species across the country due to climate change. In the last decade, climate change has decimated the Yellowstone grizzly’s most important food, the white bark pine nut. Unfortunately, the March 3, 2016, delisting announcement by the U.S. Fish and Wildlife Service (FWS) came paired with an astonishing declaration in the Federal Register: "Therefore, we conclude that the effects of climate change do not constitute a threat to the [Yellowstone grizzly bear population] now, nor are they anticipated to in the future." This statement is even more disturbing in light of your administration’s commitment to addressing climate change, because climate change predictions are dire for all our planet’s species. How can it be that the military considers climate change in all its decisions, while the agency responsible for our wildlife, the EWS, does not? The same argument- the denial of climate change – was used by the EWS in 2014 to deny listing the wolf in the lower 48 states. On April 4, 2016, that decision was reversed in federal court, and declared "arbitrary and capricious." The EWS was ordered to reconsider its reasoning about climate change. It’s now time for this federal agency to play catch up and use "the best available science" to keep grizzly bears on the ESA list. A critical question: Who benefits from delisting Yellowstone’s grizzly bears? The only certain outcome of delisting bears will be trophy hunts in Idaho, Montana and Wyoming. We ask you to instruct our federal wildlife managers to withdraw the March 3 rule and order the EWS to take another look at how climate change impacts grizzly bears. Any decision about the bear’s future should be put on hold until independent scientific review can explore potential impacts to bears from climate change. We strongly suspect that America’s great bears face a dire future, even with the continued protection of the Endangered Species Act.	FWS-R6-ES-2016-0042-5416-A1.pdf	
		US Fish & Wildlife Service COMMENT on draft proposal to Delist the Yellowstone Grizzly I am a Wyoming native who lives in Cody , 50 miles from Yellowstone Park on the edge of the Greater Yellowstone Ecosystem. Much of my life has been spent in the backcountry of the Absaroka Range in prime grizzly habitat, and countless hours in Yellowstone Park. I reckon I have had around 200 encounters with and close range sightings of Grizzly bears in my lifetime, all good. The Great Bear is a topic of major concern in my region. I've engaged the state and federal agencies on grizzlies ands other issues for over 40 years. I feel qualified to give a considered opinion on Grizzly management. I am strongly opposed to the Delisting of the so-called Yellowstone Grizzly Bear. The proposal by USFWS to Delist the Grizzly and give management over to the states of Wyoming, Montana , and Idaho is flawed. The only reasons that justify grizzly delisting are political. The reasons against delisting are expressions of accumulated science, the ecology and range management aspects, habitat concerns , and the appalling prospect of allowing the State game agencies to "manage" grizzly bears given their track record and narrow views; e. g. the Wyoming Game and Fish draft plan for management falls apart if the goal is to assure a healthy bear population in the far future. Neither Fish & Wildlife nor Wyo Game and Fish have produced a plan to guarantee the Yellowstone Grizzly's sustainability based on the needs of the bears. All plans put forth are People Plans , not Bear Plans. Best Available Politics, not science , not genuine wildlife conservation. After 40 years and \$ 40 million in research and bear management , I expected a delisting plan that actually helped the bears. Instead we get proposals that cow-tow to special interests and decidedly non-wildlife priorities. It is disappointing that delisting looks like this. We can do better. For an animal that once ranged from Hudson Bay in Canada's northeast , all the way to the Pacific Ocean coast , and south as far as Guadalajara Mexico , the proposal to sustain the Grizzly on an island with a hard population ceiling (700 bears) and a hard population floor (500 bears) with nearly zero opportunity for that island population to expand and interchange with other		

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I am not at all opposed to trophy hunting of Grizzlies in Wyoming. I can support that . But only if the agencies agree that expanding and sustaining a growing bear population outside the proposed Grizzly DMA occurs first.	Factor B	grizzlies in the Rocky Mountains is patently absurd. I seem to recall back a couple decades ago that USFWS/ IGBST said they would endevaour to bring in 'outside' grizzly bears to augment the GYE gene pool. I feel strongly that when the Grizzly was originally listed as Threatened under the ESA back in 1975 , the starting population of (maybe) 130 grizzlies then was not sufficient for genetic viability. I still feel that way , and scientists have not convinced me otherwise. Talk is cheap. Mitochondrial DNA Analyses is a young science and not the USFWS' strongest suit. Forty years is far too short of a genetic interval to be manufacturing conclusions. Besides, the Yellowstone Grizzly is NOT a distinct population or even a subspecie of Ursus arctos . That is a deceit; a biological accounting trick. Sentencing the Grizzly to remain behind an artificial map line as a Distinct Population in a Demographic Monitoring Area is a huge falsehood. Surely Fish and Wildlife knows that Grizzlies are well suited to occupation of many areas of their former ranges and domains in the West . There is a lot of suitable habitat. Why doesn't USFWS have a mechanism to connect Yellowstone bears to the huge Selway-Bitterroot Wilderness of north central Idaho ? There should be provisions for safe passage in both directions from the Greater Yellowstone Ecosystem (GYE) to the Selway via the Red Rock Lakes wildlife refuge corridor. Bears should also be allowed to move up the Continental Divide north and west of Yellowstone towards Canada. The agency should also translocate GYE grizzlies to the San Juan Mountains of Colorado, and areas in northwest Colorado. The Uintah Mountains in northeast Utah should be considered for grizzly repopulation. It is disgusting to me personally that neither Grizzlies nor Grey Wolves are allowed to expand into other areas of my Wyoming without becoming a target for a rifle. The southern Wind River Mountains and Wyoming-Salt River Range deserve bears. A case could be made for the Pryor Mountains on the Montana-Wyoming border and the northern end of the adjacent Big Horn Mountains as new grizzly range. The Crow Tribe has said as much. You should listen to the Tribes on the topic of grizzlies. Frankly , if a Giant Panda bear can be relocated from the bamboo jungles of south China to the National Zoo in Washington D.C. it should be doable to move a grizzly from the North Fork of the Shoshone River at Yellowstone's east gate to the Selway-Bitterroot , a distance of 250 miles by helicopter. In both directions. That the USFWS has not instigated Grizzly Repopulation across the northern Rockies, and the State of Wyoming wants to keep X-numbers of bears inside a Zoo Zone, and not even count any bears outside that Zoo Zone as a component of bear recovery , is a terrible deceit. This one aspect ---lack of landscape expansion opportunities for the Yellowstone bear and lack of genetic connectivity with other bear populations in the Northern Rockies --- is enough to declare Delisting to be null and void. They Yellowstone Grizzly has been branded a Distinct Population Segment strictly for political reasons, and expediency. I reject that. The agency should instead look at the Yellowstone bear both as a sustainable population AND a seed population. Yet Wyoming wants to cull bear numbers to keep them in a Goldilocks gated community of not more than 700 nor less than 500 bears, and that culling will be done by hunting and other human caused mortality , i e. " management actions". Why not relocate ' surplus' bears instead , or if a problem bear raiding the tack shed or apple orchard, put them on unsupervised probation in another state with their electronic GPS necklaces ? Wyoming Game and Fish bear managers have been playing " Musical Bears" for a couple decades now , trapping bears and hauling them to some other release point over the mountain . Sometimes the same bears. Recidivist grizzlies. We have maybe six drop points in all of Wyoming. If we were doing it right, the management agency would relocate bears to 60 drop points across five states. Again , in both directions. Please do allocate the funds to buy a LOT of GPS radio collars. I am not at all opposed to trophy hunting of Grizzlies in Wyoming. I can support that . But only if the agencies agree that expanding and sustaining a growing bear population outside the proposed Grizzly DMA occurs first. We all know that in Wyoming, Grizzly Delisting is a euphemism for Hunting. Fine. So long as all the tools in the management toolbox , not just the .30-06 rifle with 3x-9x scope , are employed across the Big Picture Landscape of Idaho-Montana-Wyoming-Colorado-Utah - and ??? Grizzly Bears are worth far more alive than dead. The proposed delisting plans (state and federal) seem to emphasize more Dead than Alive when it comes to hands-on bear management. It is regrettable the attitude behind that is so baked in to existent wildlife technocrats and bureaucrats, and narrowminded stakeholders. It is almost as bad as the notion that bear biologists and bear managers actually believe they know bears. They...do...not. USFWS and the IGBST cannot justify delisting the Grizzly by saying it has recovered enough to survive the challenges it faces. We all agree there are a good number of bears...600...700...maybe more , maybe less. The problem is the bear's best food supplies in the core area of Yellowstone Park have collapsed...Cutthroat trout and Whitebark pine seeds. The gross supply of ungulate meat is in shorter supply inside Yellowstone as elk numbers decline. Outside the Park in the Absaroka Range alpine scree slopes the Army Cutworm moth larva are diminishing rapidly due to threats from pesticides and the GMO crop cycle in the lowlands and agribusiness areas of the Midwest . Yellowstone grizzly are becoming Absaroka grizzly and preying on more elk calves, and more livestock. Because of all this, the bears are spreading out , and actual bear density is decreasing over units of public lands. What seems like more bears out on the fringe of the GYE and the proposed DMA are bears that are searching further and wider for food sources. Bears have been spreading out since the early 2000's , and the population number probably peaked in about 2006 . The notion advanced by the IGBST that grizzly's " Omnviory " , the ability to eat a wide variety of vegetation in lieu of less animal protein , is a deception. Grizzlies want meat. Plants are a supplement but not a substitute in the bear's preferred diet. Would you as a human omnivore enjoy being forced to eat mostly salads and give up beef, chicken , pork , fish --- your meats ? Having to work harder and further afield for food is a big challenge to grizzlies, but the real drawdown of bears has been human caused mortalities. We've been killing 50 bears a year for some time...an alarmingly high percentage. The Whitebark pine seed crop has been thin ...not for lack of trees , but because of climate changes and the alien exotic blister rust. BEars simply cannot find the quantity of pine nuts they were having 15 years ago, and the situation is getting worse. When all the factors concerning the bear's food supplies start compounding and cascading, the result is bears coming into conflict zones with humans and their guns. The population dynamic of the Yellowstone Grizzly is at a tipping point, just at the time the humans want to ratchet up all the negative mortality factors affecting bears. The Delisting proposals are designed to do one thing well: reduce bear numbers. And that's about all it does. The IGBST has deluded itself into thinking they have succeeded in recovering bears strictly by the numbers , when in fact the bears are in more danger now than they have been at any time since they were listed back in 1975. It's been a mark of shame that the raw data gathered by the IGBST and their tight circle of researchers has not been fully disseminated to qualified third parties for peer review and analysis. The so-called " Best Available Science" produced by Chris Servheen et al and the IGBST has been built to a conclusion with data massaged and computer models tweaked until it all fits the preconceived political outcome of fabricating bear numbers and management scenarios that appear to show a recovered, feisty, expanding bear population. It all borders on fraud. Besides, it's not about bear numbers , it's about bear habitat. And that is the other Achilles Heel of the proposed grizzly delisting proposal and State plans. There is no provision for sustaining critical grizzly bear habitat requirements. Nothing in the proposals will implore the Forest Service, the BLM , or States to manage for bear habitat. Those agencies will automatically without remorse defer their decisions on behalf of special interests and human stakeholders perceptions. The Grizzly can look forward to more habitat fragmentation and	FWS-R6-ES-2016-0042-5487-A1.rtf	

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		decline of lifestyle should delisting proceed as planned. Forty years ago when the bear was listed under the ESA, you would not have been able to find ten scientists anywhere in the USA who would tell us that Global Climate Change would be a serious challenge in decades to come. Fast forward to today , and we cannot find ten scientists who disagree that Global CLimate Change is not a force majeure to be reckoned with ...in every location on the planet from below sea level to the crest of the Himalayas, on all continents. The Yellowstone Grizzly is already adversely affected by climate change , and it's not going to get better in the lifetimes of anyone reading this. Which is why strong habitat protections and enforced regulations of landscape scale issues are paramount. Too bad none of that is in the delisting proposal . The Yellowstone Grizzly's survival into the next century depends on us making the right decisions today . The Great Bear must be allowed to disperse into several surrounding states from the Yellowstone core. That dispersion must be both natural , without undue impediments. And where and when necessary we humans must relocate some numbers and demographics of bears further afield and return virile bears to the core to replenish the gene pool. I see little to nothing in the US Fish and Wildlife's intentions or the state of Wyoming's draft grizzly management plan that would guarantee the survival and virility of the Grizzly Bear in the face of the challenges it faces. I see a People Plan and a whole lotta delusional science, and some deleterious agendas at work disguised as " management". What I do not see is a genuine Grizzly bear Recovery Plan going forward that is actually based on bears, as one would think it should be. Therefore, management cannot be turned over to the States, and Fish and Wildlife as stewards of Endangered Species must retool their thinking a produce a Grizzly bear sustainability plan that puts the bears themselves at the top of the priorities. I reject the proposed Grizzly bear Delisting for all these reasons stated here, and more. Sincerely ; Dewey Vanderhoff Cody Wyoming - submitted electronically May 10 , 2016		
		Comments on Yellowstone Grizzly Delisting To: Docket No. FWS-R6-ES-2016-0042 May 10, 2016 The grizzly is an icon, a monarch representing wildness, individuality and strength. Its pending recovery is a testament to these qualities and to effective protections of the Endangered Species Act. The American taxpayer has invested \$100â€™s of millions bringing back this magnificent species from the threshold of extinction. However, recovery w hile promising remains tenuous. Delisting of the Yellowstone grizzly bear is premature. To delist now is to waste the enormous trust and taxpayer dollars the American people have placed in the U.S. Fish and Wildlife Service and the good work of scientists and other employees. Two perspectives form rationales for maintaining ESA protections for the grizzly; one based on the role of the grizzly as the top predator on the landscape. The other is the grizzlyâ€™s vulnerability in the face of human development and climate change. The Greater Yellowstone ecosystem (GYE) is an island, surrounded by private and even public lands that hold threats to the grizzlyâ€™s recovery. The grizzly is a wide-roaming species; it cannot recover as an island. The proposal does not adequately provide for needed connectivity between the GYE and other ecosystems. The Salmon		

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In recent years grizzly population growth has stagnated. More cubs and yearlings are dying. In 2015, there were 60 grizzly mortalities in the GYE as a result of human conflicts and other interactions. This is clearly not sustainable. It could throw any calculated average mortality formula out of the delisting ballpark. These need to be recalculated given the increase in mortalities in 2015. At this point, landowners and state agencies are getting “trigger-happy” and the mortality rate in 2016 could be as high or higher. The prospect of delisting makes it hard for many to hide their absence of tolerance and they may not be able to control themselves.	Factor B	species; it cannot recover on an island. The proposal does not adequately provide for needed connectivity between the GYE and other ecosystems. The Selway-Bitterroot must be occupied before the Yellowstone grizzly is delisted. The Bitterroot is the pathway to the Northern Continental Divide and Cabinet-Yaak ecosystems. The grizzly occupies less than 2% of its historic range and populations in the GYE and NCDE are paltry compared to historic levels. Connectivity, both habited and genetic, needs to occur at the landscape scale before the grizzly can be safely delisted. Demographic connectivity areas need to be identified and people educated to respect the grizzly. Without connectivity, there is no recovery. Within the GYE, climate change is eating away at the whitebark pine, the preferred food source of the grizzly. This nutrient rich food is particularly important for females, the slowest reproducing mammals in North America. Other sources such as army moths and a range of berries are similarly vulnerable to climate change. Climate change also means less reliable snowpack and earlier emergence from the den leading to a longer non-denning season during which the grizzly needs food. While the grizzly is resourceful and as the top predator, capable of substituting other foods, the effects of the decline in whitebark pine cannot be certain since not enough science has been done or time lapsed to accurately assess changes such as fecundity rate and body weight. Observations of these changes could lag years or decades behind. Just as American’s have gotten bigger, though not necessarily healthier due to increased protein, the grizzly too can mask nutritional deficiencies as it relies more on meat based foods. In addition to unknown and untested effects of changes in a full spectrum of nutritional values, securing these meat-based sources presents increased risks to the grizzly. Access to meats whether by livestock predation or attraction to the scent of a fresh elk carcass comes with human conflict, and in this the grizzly is the more vulnerable. In recent years grizzly population growth has stagnated. More cubs and yearlings are dying. In 2015, there were 60 grizzly mortalities in the GYE as a result of human conflicts and other interactions. This is clearly not sustainable. It could throw any calculated average mortality formula out of the delisting ballpark. These need to be recalculated given the increase in mortalities in 2015. At this point, landowners and state agencies are getting “trigger-happy” and the mortality rate in 2016 could be as high or higher. The prospect of delisting makes it hard for many to hide their absence of tolerance and they may not be able to control themselves. People and bears can co-exist but many do not know it, because of tolerance of political hostility towards these magnificent creatures. The proposed delisting does not adequately address ways to mitigate the conflict and underestimates the virulence with which many, though not all, in the livestock industry perceive the grizzly and other predators. The FWS has only to look at the recent wolf delisting to get the picture of what awaits the grizzly. Since the Rocky Mountain Gray Wolf was delisted in 2011, its population has declined from a minimum of 653 wolves to 527 at the end of 2015. That is a decline of almost 25 percent, even in a rapidly reproducing species as compared to the grizzly. This drastic drop in population and disregard of the wolf’s ecological role on the landscape is intentional. I personally have testified before numerous committees of the Montana legislature in the last two sessions. I also have testified at MT Fish Wildlife and Parks hearings. The political vitriol for the wolf is repugnant. Montana law has made it easy to hunt, trap and kill wolves, extended wolf-hunting seasons into spring when mothers carry their unborn, increased wolf “bag” limits, instituted practices that strip fair chase hunting of any meaning, and allows landowners to kill a wolf at “perceived threat”. As bad as Montana is, Idaho is worse: There, entire wolf packs are aerial gunned in remote areas, professional hunters are hired to kill wolves in designated wilderness, and the budget for state sanctioned killing of wolves is increasing. FWS is lying to itself and the American people, if it doesn’t acknowledge that a similar fate awaits the grizzly upon delisting. If the Yellowstone grizzly is delisted, FWS can count itself as an accomplice. The proposed plan accepts a smaller population, ostensibly based on science. Yet, it has not adequately factored in the political vitriol as evidenced by delisting of the Rocky Mountain Gray Wolf. Based on the wolf example, delisting of the Yellowstone grizzly is nothing short of a license to kill, in more ways than the proposed trophy hunt. It is wishful thinking on the part of State wildlife management agencies so they can respond to political prodding by the powerful livestock industry and remove a “perceived threat” that puts them in the cross hairs. Grizzly bears are making a slow recovery thanks to protection of the Endangered Species Act. However, they remain vulnerable due to shifting food sources, isolation, an increase in preventable conflicts with hunters and livestock, and an hostile political climate. All of these issues need to be addressed prior to delisting. Now is NOT the time to strip the grizzly of ESA protections. The perceived recovery is too tenuous. Delisting will reverse any hard fought and expensive gains. The ESA and the FWS still have more work to do. Please do your work and do NOT delist. Submitted by, Claudia Narcisco 5607 Gharrett Ave.	FWS-R6-ES-2016-0042-5542-A1.docx	

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Disease: Due to the small population of grizzly bear, islands of bear habitat and global warming, it is possible that the Yellowstone population could be decimated with a disease that the bear would never recover from. 700 bear are too small of a population for long term survival. How does delisting now respond to issues of disease?	Factor C	5-9-16 To whom this does concern, Please accept these comments on the premature Grizzly bear delisting that is proposed the USFWS. I am very supportive of delisting Grizzly bears if the population, habitat and food sources are secure to allow for populations to reach historic levels and fill historic habitat . As it is now the USFWS and states are satisfied if the population is well below the historic population of 50.000 Grizzly bears. The listing is unwarranted because the population to be unlisted is small and does not include the historic range of the bears. The piecemeal delisting in one small area of the historic range will not truly recover the species. Griz should not be delisted around Yellowstone National Park when Grizzly bear are not present or struggles to survive in 98% of their historic range. Canada has for many years been looked at as a genetic supplier for many species into the US. The population of Grizzly in Canada is also decreasing due to loss of habitat , roads, oil and gas development, mining and hunting, housing, ranching, farming, etc. These are the same pressures and demands that the US puts on historic Grizzly bear habitat. This delisting will create an island with delisted bear that will become inbred as wildlife corridors have not been determined and protected from fragmentation, road building and human growth in valleys as is easily seen in the included maps. Until hard management strategies are in place to limit human activity (hunting of Grizzly, road building, climate change, trash storage, grazing, weeds, logging, human development of valleys and a basic understanding that Grizzly bear do not have other places to live) any delisting will be the end of this top predator . People need to understand that they live in Grizzly bear habitat out of choice. Grizzly bear do not have this choice of where to live . People need to stop being so self-centered and become educated on how people must change their behaviors to accommodate the needs of Grizzly bear to survive in the long term. The USFWS needs to take on this challenge to educate people on the needs of Grizzly bears and actions that are required to enhance and enlarge places that grizzly bear can live in safety . Hunting: The hunting of Grizzly bear is unacceptable for any reason. The Grizzly bear need to have the same protections as Bald eagles where the eagles are delisted and people cannot hunt them. The states protection of Grizzly bear did not work in the past and will not work in the future without mandates from the USFWS that any future delisting will not allow for hunting until the population reestablishes historic populations of 50,000. A population of 600 Griz is too small to be a viable population. I doubt that the USFWS would consider at a population of 600 humans in the greater Yellowstone as viable if there were only 1200 ,+/-more humans in the lower 48 states. The reason a hunting ban is imperative is due to listening to a Montana Fish Wildlife and Parks employee saying “that deer populations are increasing in Montana and we hunt them. And the Grizzly bear will do fine hunting them too .” The mindset that Grizzly bear are like deer is ludicrous. Also whitetail and muley deer populations are doing fine in cities, but not so well in most of Montana. Blue tongue disease and loss of habitat are harming deer populations. Fish Wild and Parks treats predators differently than ungulates. If populations of wolves are not reduced to “acceptable” levels, the hunting season is increased and new hunting methods are allowed. This includes trapping, increase in numbers of wolves allowed by one hunter to take, silencers, etc. This is not done with deer and elk. FWP and federal trappers do not go out and slaughter a herd of elk or deer with aircraft because hunting targets were not met, they were a threat to cattle or they were too close to my cows. I fear tha t Griz will be treated as wolves since 600 bears is our target population to keep the Griz off the ESA and this is our target. We will allow for hunting, bear baiting, etc to keep bear at this population at all costs. Delisting of wolves has not gone so well in Wyoming and the mid-west, at least according to federal judges. Federal funding for Grizzly population surveys will stop after 5 years. Will it then be left up to the states to monitor Grizzly Bear? Is there a funding mandate placed on the states to monitor the Grizzly populations? Economics: There has been new economic information on the value of Grizzly bears for tourism. The study showed that Grizzly bear are an economic driver for tourism. Hunting Griz will hopefully create tourism boycotts. Disease: Due to the small population of grizzly bear, islands of bear habitat and global warming, it is possible that the Yellowstone population could be decimated with a disease that the bear would never recover from. 700 bear are too small of a population for long term survival. How does delisting now respond to issues of disease? Isolated populations: Unfortunately politics punched a hole in the ESA when Senator Testor put a rider on wolf delisting. Up until that point, whole populations needed to be at least stable growing throughout species historic range before delisting could happen. The delisting of pockets of Griz when the bear are not established in their historic range is shortsighted. How are the bear doing in the Cabinet Yaak. How will the bear do around Glacier long term when one looks at human development? What is the acceptable population numbers and habitat that the USFWS has determined for Griz to be delisted in the lower 48 states? Look at all of the human growth in the Madison, Gallatin and Paradise , Boulder and Redlodge Valleys. How does this growth allow for Griz to re-inhabit historic ranges? Food sources: The diet of Griz around Yellowstone NP has changed drastically. The bear have lost whitebark pine, cutthroat trout and moths as a major high nutrient food source. As a result their diet has needed to change. How will delisting these bear now protect future bear generations if they lose other food sources? Is there enough habitat and human tolerance for Griz that will allow for Griz to use new habitat for new food sources? How will delisting effect Griz if the bear take cattle on federal grazing leases? New threats: The new threats come from the same old major threat-humans. Without the ESA protections it will be difficult for policies to be put in place quickly to protect Griz. Look how long it has taken to establish viable Bull trout critical habitat? Habitat loss: Growth around national parks and wilderness areas are the fastest growing areas in the west. People want to live in nice places. Unfortunately griz do not have the latitude or ability to move to many places in the west and survive. They have been pushed in the past to places that people did not want to live. They were plains animals. I have included maps of population growth in the Flathead from 1970-2010 and these maps clearly show habitat loss. If federal lands are transferred to the states as some people want, how will this political action affect the viability of Griz?? Without ESA protections many shortsighted land management decisions will be made that will reduce habitat sui table for Grizzly bear. In the past even in the 1970s when food sources were bad for Grizzly bear, they could go down in the valleys and find food. With the conversion of the vallevs to housing and ranching the bear have lost this source of food in times of drought. As global warming continues. where is the habitat	FWS-R6-ES-2016-0042-5183-A1.docx	

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		What the conversion of the valleys to housing and ranching the bear have lost the source of food in times of drought. No greater warming continues, there is the need to set aside b the states to accommodate this top predator? I am amazed at the growth of humans and change o f wildlife habitat to human dominated habitat from highway building, human housing development, roads from log ging, weeds and the shorter winters in Idaho, Montana and Wyoming since the 1970s. When I project this growth forward, I really do not know where the griz will live in the future. Look at the map of the Flathead in 1970 and then 2010. The growth is impossible to ignore. This growth has happened throughout Griz habitat. The bear was listed in 1975 and look at the loss of habitat and how Montana finally was forced to stop hunting the bear in 1980? Now you want to leave it to the states to manage Grizzly bear ? Griz are not deer. Global warming: From 1978- 2000 there were over 30 more frost free days in Montana. It does not get down to -50F anymore. Forest fires and lower and less snow pack will be more common. How does delisting the bear now protect them in the future as their present habitat will be unrecognizable in 20-30 years? Hunting: There is no rational reason the hunt Griz again. I have hunted in the past and do support hunting. But not for Grizzly bear. They reproduce too slowly and there are too many human caused threats present and unforeseen future ones to allow for the states to hunt them. Look at Wyoming â€™s plan to only allow wolves in a small part of the state. Look at Idaho that says they are doing elk studies in the Frank Church River of no Return Wilderness with helicopters and it turns out it was only to hunt wolves? Look at Montana where wolf hunting rules are being relaxed and new manners of killing them is looked at ev ery legislative session? I do not trust these states to wisely manage Griz. Past hunting got the bear listed. While the public in general wants top predators on the landscape, local ranchers and hunters do not like top predators. Ranchers with federal grazing leases hate predators and will shoot more of them without federal protections. What will happen when a hunter wounds a bear and the bear gets pissed and starts killing people? Bear are not deer. There is no reason to hunt bear. It will encourage poaching, allow for ranchers and farmers to shoot bear on sight and unfortunately lead to the bearâ€™s eminent demise. Please do the right thing for future generations and stop the delisting of Grizzly bear until there are stable populations in the Frank Church and Selway-Bitterroot Wilderness Areas, the CM Russel, Washington, Idaho, Oregon and California(the bear is on their state flag). As you know top predators improve habitat for all species. Including humans. The piecemeal approach to Griz delisting is short sighted and will fail the species that the ESA was designed to help. Thanks for your time , Stephen Braun PO Box 5614 Whitefish, MT		
		t RECEIVED Grizzly Bear Delisting Proposal Attn: MAY 1 1 Zum Docket no. FWS-R6-ES 2015-0042 D _ US F&WS, MS: BPAC 5275 Leesburg Pike Falls Church, VA 22041-3803 Comment by: Don Bachman â€™ 3910 Sourdough Rd., Bozeman, MT 59715 I am opposed to the Grizzly Bear Delisting Proposal at this time. My first awareness of the grizzly bear came from growing up in California when my father, who worked for the United States Forest Service, explained the bear on the state flag had all been shot and trapped to death well before I was born, in 1938. My next consideration of that fact came in 1979 while I was working in the San Juan Mountains of Colorado when the last grizzly in that state was killed during a hunter confrontation. In 1980 while spending 3 weeks in the Alaskan bush I constantly carried a gun for protection from bears. That precaution was maybe necessary then, but unneeded. I came to live in Bozeman in 1989, and since have hiked, camped and worked in occupied grizzly bear habitat and have always carried bear spray since it has become available. I am aware of the history of grizzly bear occupancy in the Greater Yellowstone Ecosystem and am very pleased with the recovery progress made under the protection of the endangered species act. My wife and I are always thrilled (and cautious) when we see signs of the bear through tracks, diggings, claw marks and scat. ...and of course the objects of bearjams. I have attended meetings of the Interagency Grizzly Bear Committee and the recent hearing held by the Fish and Wildlife Service in Bozeman. I have read some background material, including the Executive Summary of the 2016 Conservation Strategy on the proposal and have been informed on the issue from many other readily available sources. The stated goal		

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The principal impediment to migratory connectivity is human-caused mortality associated with livestock grazing and elk hunting. There is evidence that bear conflicts and mortality have occurred in both theGravelly and Centennial ranges. The situation in the Wind Rivers, Wyoming and Salt River Ranges, could be similar. I suspect that livestock allotment priorities of the US Forest Senrice serve as managementpriority impediments to grizzly bear range, and thus, population expansion and stability. The matter of connectivity and wildlife conflicts should be a part of National Environmental Protection Act (NEPA)examination for all public land grazing allotment suitability examinations. These reviews should be conducted for every allotment in the Greater Yellowstone Ecosystem, prior to delisting, and the matterof conflict examined.	Factor C	of delisting is to shift from managing for recovery to one of conservation. This is admirable, but is flawed under the strategy developed. The matter of genetic viability is virtually dismissed in the absence of established connectivity and is â€œsolvedâ€ by a vague reintroduction program. This involves bringing male bears into the Primary Conservation Area (PCA) from other populations for genetic introduction purposes. Not discussed in the plan is the potential for breeding competition with resident males or the potential for incidental or hunt mortality of these bears, especially if they "strai/â€™ into the Demographic Monitoring Area (DMA). Connectivity corridors provide not only for exiting bears which can ultimately share their genetic material, but incoming bears from the Northern Continental Divide Ecosystem (NCDE) naturally seeking out the Greater Yellowstone Ecosystem. In the absence of hunting and incidental mortality, these are the individual bears that should provide the diversity sought after and necessary for recovery. The principal impediment to migratory connectivity is human-caused mortality associated with livestock grazing and elk hunting. There is evidence that bear conflicts and mortality have occurred in both the Gravelly and Centennial ranges. The situation in the Wind Rivers, Wyoming and Salt River Ranges, could be similar. I suspect that livestock allotment priorities of the US Forest Senrice serve as management priority impediments to grizzly bear range, and thus, population expansion and stability. The matter of connectivity and wildlife conflicts should be a part of National Environmental Protection Act (NEPA) examination for all public land grazing allotment suitability examinations. These reviews should be conducted for every allotment in the Greater Yellowstone Ecosystem, prior to delisting, and the matter of conflict examined. __ _-,-1 1-1l_n1 1111*1'_1_`1 â€¢ 11 1. 1 - â€˜ 1*-* 511111* 1 111 1- 1-1 t1 1 _L--_J l. 1 1 1 _  11.1 0 '111ÂˆÂˆ 11 "" 1:;; 1 11 1. 1* 1111 .1 l l'. 1 Âˆ» 1 1 1 â€˜ 1*.. {1 â€˜ 1'1â€˜ _ 1 Âˆ.'`i"! all 1 ' 111 â€˜ 1* 1 l. l1 1711 ''` 1 " ~. ' 1. l _ *' g 1 l11. 1 Âˆ» 1 1 1 .. 1 l l; .1 " = 1. Âˆ. â€˜vÂˆ.1 1 Âˆ. 1 11 * 11 . l 11 1 VI! 1 1 â€˜ 1 "" 1Âˆ. 11 1 l 1 11 . . 1 1. 11 '1. Âˆ. l 1 1. . F11 1 E. . '-1 1. _1." 1 :1  â€˜ 1 ... 17 1 l 1 1 1_1Âˆ. 1 Âˆ. \$ 1 _â€¢ 1 *1 ' 11 1117 11 1 Âˆ. 1. , 11 1 - Âˆ.Âˆ.' . .1 11. -. . . ` 1 â€˜ Âˆ. â€˜ 1 1, 1n'', 1 1, -, â€˜ 1 11-' l'.' ' â€˜ ..`.' 1 1 1.1 1 _ l 1 1 1 Âˆ. 11. 2 -1 1 11* . Âˆ. â€˜ Âˆ. Âˆ.1 1 1 1 1 1 . Âˆ. â€¢ Âˆ. . 1 1 ' lt Y1 1 1 1 l1 A 1 1 Âˆ.' â€˜11 L- 1 1 1 1 - 1 _1 11 1 1 1 1 v .1 11-. 1 Âˆ. Âˆ. 21 -Âˆ. 1 -1 Âˆ. 1 1 n1 1 1 ' l 11 Âˆ. 1 111 â€˜ 1~1 1 11* t 1 1. *1. . 11`. 1 J 1 l l UZ _ 11 l N ." 11` 1 1 1 1, -1 l _ 1-1 11 1, 1, " 1   1 1 l_ 1 11 1 1 11 . 71 1,1 l  __ 1 1 1 1 1 .1 1 1 Âˆ»'s`', ,Âˆ. ~ ~ _ . 1-11. `1â€™1 1 1 1 1 11'1 . .1 *Âˆ. 11 â€˜ Âˆ. 111. â€˜ 1F Grizzly bear mortality appears to be increasing, even though bear population is stagnant or diminishing over the past several years. It is hard for the lay person to tease out exact mortality statistics, but I find it significant that 2008 mortality when the bear was first delisted was 58, a record at that time, and that 2015 morality is now 61. intervening years are around 50. For an animal of slow reproductive rate and marginal population this is a pessimistic trend. If delisting is accomplished as in 2008, we can expect greater mortality from hunter-related incidents as bears are drawn to elk carcasses or disturbed, and hunters can and will, shoot bears with far fewer, or no state enforced penalties. The issue of white bark pine mortality, cut throat trout decline and pesticide-targeted moth population sustainability is showing that changing feeding habits can result in more conflicts due to shifting diet preference. This places bears at even greater even greater risk than only a few years back. The funding of the extensive monitoring plan must be considered and guaranteed. This is a tough element to contend with at the outset of a program, but funding must be assured if this proposal is to ultimately be adopted. Perhaps some sort of trust could be established insure continued federal oversight. The conservation strategy places future management the PCA for the Yellowstone grizzly bear population in the hands of the adjacent states. Montana, Idaho and Wyoming exercise varying degrees of cultural and political considerations when directed to manage this nationally-important population of a scarce mammal which has been extirpated from the vast majority of its range. During this comment period we are witnessing a range of public attitude toward this Threatened animal. The Federal Fish and Wildlife Sewice and its staff must consider the national public trust responsibilities it shares with other federal land management agencies and tribes in the consideration of this proposal, and deny delistlng at this timQi, Cl, .i.ii.ii.Âˆ»..Jl â€˜ 9 .i\ls,aa::asm yy Qi l/{Mc ` _> ____ l- T __ T m==;i â€˜> ; ~ â€˜ ;  *2  Âˆ. ;": â€˜;Âˆ. riâ€˜"â€˜â€˜;â€˜-â€˜Âˆ.  i- â€˜ ; â€˜Mlâ€˜ r .jQ`lÂˆ»lâ€™Hâ€™ W - iâ€™*?!Âˆ.Âˆ.* ; u x ui ~YÂˆ.!!â€™?!\$UÂˆ?!Âˆ.â€™. :Âˆ}â€¢*!li Wi 5*4 J l 'Âˆ.'â€¢'Âˆ@unYY 2 w:lÂˆ. l1 iff!- 1Tlâ€™1Tf+]=â€˜=lâ€™3â€¢â€¢C liigv HT, Qlj_lQÂˆ}' my â€˜lâ€™ xi U FZ'~` 7 ., 7 , ` l` H L ' Âˆ.Âˆ. ÂˆÂˆ. mn rank ':sÂˆ. wmilt Âˆ.Âˆ.-m~ 1Âˆ~Âˆ» ~ Âˆ»Âˆ.Âˆ.Âˆ.»j \$fâ€¢câ€¢ â€¢cÂˆ»Âˆ. w E**ÂˆÂˆ.n lTâ€™!&Âˆ»*   4 Âˆ.~*3â€™ Âˆc YW wh Âˆ°` Âˆ. !â€¢c mf r lll! Âˆ\$ _â€¢cÂˆ}~.Âˆ»h nr iw VI' â€˜ fh2tâ€¢câ€¢c-' if 912 VHMI:1 Hu .â€¢cÂˆ.* â€˜1.Âˆ.lZl;â€¢cCÂˆ»4LZÂˆc W lH RP" Fi .Âˆâ€˜*Hâ€™W 1""Âˆ;â€¢œ'rl* _ *1: â€˜U*T Zi'Fâ€™W2"\$I" V ""Âˆ.1 " JH 1** i **Âˆ.*W"" w __ l _ P, __ >_ Y > _ pq, PD [1*; "\â€¢c- l J 'Âˆ. i; Âˆ.--â€¢c v" str ml L[â€¢c lajh nil T l'-; .a.â.,-"\$ L9);. nl 1T H * i 1 xw "Âˆ°` Âˆ.:rÂˆ.   ÂˆÂˆ.â€¢cÂˆ.Âˆ»Âˆc:Âˆc- ** *â€˜*â€¢œvÂˆÂˆ<~"i".ÂˆÂ F": 3 y Âˆ.Âˆ.   ÂˆÂˆ.-   â€¢œ'Âˆ"ii Âˆ.Âˆ _ .Âˆ°. Âˆ}* MF ...Âˆ»aÂˆ»1-Âˆc. _Âˆ.1.' _lâ€™r;ÂˆÂ ~Âˆ°alY1T!if mh cweÂˆ. JtÂˆÂ. i.Âˆl 1 J1 __1â€™Âˆ»3. i Âˆ»Âˆ» ina iii l il` l im ii Âˆ _ AMLEWH, ; l E â€¢c{ -- dr- lIgums Mlgfl. l 4 Qu l'Âˆ.â€¢cÂˆ. _ * jp H" NG Ti â€¢c~ {PEPl-ZIZIN :lÂˆ\$â€¢c l [61 IM-?.} V J l 'W fÂˆ. pi 4, Âˆ¥â€¢c# ygygpuf W; i ig { gwyi}. \ÂˆEng;;Âˆ@4)? Âˆ»Âˆ.Âˆ.Âˆgfw?{ win; my znhpg-__ J A YÂˆ°Q 0.ÂˆÂ. 'Âˆ _ ~ "?\$`Âˆ _ (- 1 ai l t .il ie "â€˜ 'ilÂˆ@al Tl W J â€˜ _ 16 un` Âˆ.\ =` l	FWS-R6-ES-2016-0042-5677-A1.pdf	

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More must be done to prevent conflicts with hunters & ranching operations in order to protect bears, people & livestock.	Factor C	U.S. Fish and Wildlife Service IVlountm-Prairie Region I â€¢ > J -1*-2. ` _ _ â€” Yellowstone Grizzly Bear Â«â€”“**Â--Qu} ' .â€™™ .\ . P I t' P d D I' t' Â· Â· OpII 8 IOIâ€”I l'0pOS9 9 IS Ing ,. Comment Form The U.S. Fish and Wildlife Service (Service) is accepting written comments on the Greater Yellowstone Ecosystem grizzly bear population proposed delisting rule, the draft supplement to the 1993 Grizzly Bear Recovery Plan for the Yellowstone grizzly bear population and the draft 2016 Conservation Strategy. The recovery of the Yellowstone grizzly bear population serves as a remarkable Endangered Species Act success story. It is the result of strong partnerships among the Service, federal and state agencies, tribes and other partners. Yellowstone grizzly bear numbers have rebounded from as few as 136 bears when listed in 1975 to an estimated population of more than 700 today. There is now a sustainable and resilient population that occupies the entire available habitat. The population is at or near the â,~COSyStâ,~IT`lâ€™™S IOIâ€™™Ig-(â,~I"ITl Caffylflg Capailty. To comment, return this form by mail to the address on the reverse side. Fold this form on the lines with the retum address showing, tape it closed, affix a stamp, and mail. You may attach additional pages. Comments may also be submitted for Docket No. FWS-R6-â,~Sâ€”20I6â€”0042 via www.regulations.gov. For your comments to be the most effective, the Service suggests the following guidelines: rn Â·) â€¢ Be specific. Clive defined reasons, not broad statements, or opinions. A ` â€¢ Share sitespecific observations, data, or knowledge. I â€¢ Detail important environmental and community factors. DiV. Â· . Â· . BE timely. Comments are requested by May to, 2016 to be considered in the final rule. 1 1t;L;:â€”lf11s& â€¢ This is not a voting process. Petition signatures typically only express an opinion, which is not helpful in our decision making. I I . You may insert additional pages. â€” Please provide your contact information. Before including your address, phone number, eÂ·mali address, or other personal identifying information In your comment, you should be aware _ that your entire comment -â€”Including your personal identifying InformatlOnâ€”may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. ORG NIZATION /6 2 / MAILI ADDR}; S ""Q 90 6 X ClIv, STATE ZIP CODEThank you for your interest and participation!~ . Ig:- "â€”â€”E~ED MAY 12 2 4Â» E' 4 v. Â»g,~Â»,.Â« W64 Q_. mj ____ ..g _ _ ____ _ Â« I;-â€”â€”â€”â€”-â€”-â€”-â€”.â€”. _ .214 ?-'Â·Â·Â· * YJ. 'Â· Q 4 ;__f _ 1 I 2 Â»L_Â»Â« J 1 J .., Â·.Â·Â· I 4 ~â€” _-{J.a.?Â·.*' , Cb; L wm {44 4f 4..: f ; I} _____ IÂ·Â·.Â·r4 { J! . 1 / 4 â€” _ J: 61.4. Â» _ , _____ * K. ,Ã©LQ.i..% 0 . .~ H J. 1, -I_ 1 â€” II pl J Â· J W. _ r I II . xx . "â€”C7" /4 ef g. 1 ____ L. 1 e,, JI .. f ,, -u I/I :.....- Â· fj..____ db. N :76 QHFQA _4 id I *1 p E Ir _; Lazgdg 6 "`` â€™ #	FWS-R6-ES-2016-0042-5686-A1.pdf	
		We, the undersigned scientiilic experts, are writing to express our strong opposition to the pmposal by the U.S. Fish and Wildlife Service (FWS) to remove the grizzly bears (Ursus arctos horribilir) living in the Greater Yellowstone Ecosystem (GYE) from protection as a threatened species under the Endangered Species Act (ESA),' leading to Northern Rockies statesâ€™™ commencement of an imsustainable trophy- hnntingz season on GYE grizzly bears, which continue to be imperiled by resomee declines, including habitat and dietary staple losses. GYE grizzly bears are not recovered. Before 1800, approximately 50,000 grizzly bea.rs roamed the lower 48 states between Canada and Mexico} After European settlement, humans heavily persecuted grizzly bears to near eradication} Today, wild grizzly bears number fewer than 1,700 individuals in the lower 48 statess â€” while FWS claims that there are 700 grizzly bears in the GYE,Â· this is a contested figure.? Grimly bears have not recovered across a signicant portion of their range, and thus they are not recovered and should not be delisted. Trophy hunting grizzly bears would further jeopardize their		

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The loss of flora and fauna upon which grizzly bears depend in Yellowstone and Grand Teton national parks, in part, explains why grizzly bears are dispersing in greater numbers from park lands to national forests lands, which are grazed by public lands permittees, to search for food. Because of ubiquitous livestock outside of park lands, record numbers of grizzly bears have had lethal encounters.	Factor C	persistence. Pursuant to a tri-state memo, Northern Rockies states have allocated bears for the purposes of "discretionary mortality available for regulated harvest" within the Demographic Monitoring Area (DMA) as follows: Wyoming would authorize hunting for 58% of the bear quota, Montana 34% and Idaho 8%.9 The number of grizzly bears states will permit for trophy hunting is unknown. While Wyoming has issued a draft grizzly bear management plan, it would inadequately protect GYE grizzly bears in the absence of a federal ESA listing because it gives broad discretion to the Wyoming Game Commission to set the manner of take (e.g., baiting, hounding, trapping, stalking), bag limits, seasons, sex ratios and age limits for grizzly bear hunting.'Â° How Idaho or Montana will permit grizzly bear hunting is also currently unknown. Under this veil of uncertainty, the FWS is rushing to close the public comment period (ignoring reasonable requests for a deadline extension justified by the voluminous documents released by FWS) in order to rapidly delist grizzly bears for what appear to be more political than scientific reasons. Such action conflicts with the ESA requirement to make listing decisions solely on the basis of the best scientific evidence available and to seek meaningful public comment on listing decisions. Grizzly bears face multiple threats to persistence including the loss of their primary food resources. Currently, whitebark pine seeds, native cutthroat trout, huckleberries, army cutworm moths, elk and bison are either declining and/or are expected to decline in the foreseeable future as a result of habitat loss, climate change, drought, invasive species and other anthropogenic causes. Traditionally, whitebark pine seeds have provided a core dietary staple for grizzly bears. Yet, the whitebark pine, a species the FWS agrees warrants federal protection, is in decline because of a variety of problems! Another key source of sustenance, the cutthroat trout, has stopped spawning in all tributaries of Yellowstone Lake)2 Army cutworm moths, a staple for grizzly bears since the late 1990s, could likely disappear because they nectar on tundra flowers, which are highly vulnerable to global warming. Added to these threats to the sustainability of the GYE grizzly bear population, Yellowstone's Jackson and Northern Range elk herds and its Central Range bison herd are all in decline); Because of warming summer temperatures and drought severity since 2005, many berries have become largely unavailable to grizzly bears. These food failures"whitebark pine, cutthroat trout, huckleberries"have caused grizzly bears to switch to a more meat-based diet, including domestic livestock. As a result, bears have been in conflict with humans, leading to record numbers of lethal actions taken against them." 'His additive mortality harms their persistence.'Â° Furthermore, biologists have noted that grizzly bear cub production has declined"â€” perhaps because of more predation on cubs by wolves and other bears as a result of their new dependence upon a meat-based diet., which puts them into greater proximity with other predators, resulting in deadly strife on grizzly bear cubs. The loss of flora and fauna upon which grizzly bears depend in Yellowstone and Grand Teton national parks, in part, explains why grizzly bears are dispersing in greater numbers from park lands to national forests lands, which are grazed by public lands permittees, to search for food. Because of ubiquitous livestock outside of park lands, record numbers of grizzly bears have had lethal encounters."; Worse, if grizzly bears are delisted, the GYE bears who already live or disperse outside of the DMA's artificial boundary will not be counted toward states' population objectives and will likely be subject to persecution. Yet, these dispersing individuals are vital for providing connections between other populations, maintaining genetic diversity and preventing genetic drift and inbreeding depression. While the conclusions of certain studies upon which the FWS relies suggest that grizzly bears have reached their carrying capacity, there is ample support for an alternative theory that bears have lost their historic dietary staples and are now turning to both native and domestic ungulates, putting them in closer proximity to humans, wolves and/or other bears.2Â° While this shift is occurring it is impossible to predict whether and when the GYE grizzly bear population might reach carrying capacity". FWS is not scientifically justified in concluding with certainty that the GYE population has reached long-term stability and is therefore secure for the foreseeable future. There is far too much uncertainty reflected in the current science to justify such a conclusion; rather, the best available science and the precautionary principle demands continued federal monitoring of this vulnerable population, which will only happen with continued ESA protection. The public highly values grizzly bears. In 2015, Yellowstone received 4.1 million visits and Grand Teton had 4.6 million contributing \$890 million to Wyoming's gateway communities, and \$1.1 billion to Wyoming's overall economy. These figures greatly outweigh revenues generated by either Wyoming's livestock or hunting industries? Grizzly bears, in the human economy, are worth far more alive than dead. For all of these reasons, we urge you not to remove grizzly bears from protections under the BSA. Now is the time to redouble grizzly bear conservation efforts, not decrease ~Â·Â·Â·.	FWS-R6-ES-2016-0042-5687-A1.pdf	

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We can't delist the grizzly right now, its food sources are in decline, cub mortality rate is high, there is no connectivity between the Greater Yellowstone Ecosystem and the Northern Continental Divide Ecosystem, and human caused grizzly bear deaths are at an all-time high.	Factor C	J! if C`Â· qemiuq iw _one @56* QW __ .. .... .15: .. __c  cs ww  { QM 3  * 6 Cu  r- â€™ `Â·;=, Â· 0 0 fs Oc `jflIÃ@wnum Cv ....ad bg +0umi lywk} pmt; Em; A1-gmmqzz? gnazjll jj Cxe_. i_ __ fu igmye gc beU. .... gf fr>@ _; ` A ; F - qA,) _TL7 <><.Y*~â€™ Â¤]O,`J_~L:n,_\IÂ\$2;Â¤;.~:nlA.@;P&x;Â¤;}Â·;L;&L-Â·Â¤Â·yÂ¤,,_;.l;;Â¤..,% ..._j `.. gÂ· ;]IAÂ¤1f`]~\ Â· 5; _ iy _____ _____ _____ . i ... 9*; - - --â€™â€™â€™ ~	FWS-R6-ES-2016-0042-1226-A1.pdf	

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Having to work harder and further afield for food is a big challenge to grizzlies, but the real drawdown of bears has been human caused mortalities. We've been killing 50 bears a year for some time...an alarmingly high percentage.	Factor C	US Fish & Wildlife Service COMMENT on draft proposal to Delist the Yellowstone Grizzly I am a Wyoming native who lives in Cody , 50 miles from Yellowstone Park on the edge of the Greater Yellowstone Ecosystem. Much of my life has been spent in the backcountry of the Absaroka Range in prime grizzly habitat, and countless hours in Yellowstone Park. I reckon I have had around 200 encounters with and close range sightings of Grizzly bears in my lifetime, all good. The Great Bear is a topic of major concern in my region. I've engaged the state and federal agencies on grizzlies ands other issues for over 40 years. I feel qualified to give a considered opinion on Grizzly management. I am strongly opposed to the Delisting of the so-called Yellowstone Grizzly Bear. The proposal by USFWS to Delist the Grizzly and give management over to the states of Wyoming, Montana , and Idaho is flawed. The only reasons that justify grizzly delisting are political. The reasons against delisting are expressions of accumulated science, the ecology and range management aspects, habitat concerns , and the appalling prospect of allowing the State game agencies to " manage" grizzly bears given their track record and narrow views; e. g. the Wyoming Game and Fish draft plan for management falls apart if the goal is to assure a healthy bear population in the far future. Neither Fish & Wildlife nor Wyo Game and Fish have produced a plan to guarantee the Yellowstone Grizzly's sustainability based on the needs of the bears. All plans put forth are People Plans , not Bear Plans. Best Available Politics, not science , not genuine wildlife conservation. After 40 years and \$ 40 million in research and bear management , I expected a delisting plan that actually helped the bears. Instead we get proposals that cow-tow to special interests and decidedly non-wildlife priorities. It is disappointing that delisting looks like this. We can do better. For an animal that once ranged from Hudson Bay in Canada's northeast , all the way to the Pacific Ocean coast , and south as far as Guadalajara Mexico , the proposal to sustain the Grizzly on an island with a hard population ceiling (700 bears) and a hard population floor (500 bears) with nearly zero opportunity for that island population to expand and interchange with other grizzlies in the Rocky Mountains is patently absurd. I seem to recall back a couple decades ago that USFWS/ IGBST said they would endeavour to bring in 'outside' grizzly bears to augment the GYE gene pool. I feel strongly that when the Grizzly was originally listed as Threatened under the ESA back in 1975 , the starting population of (maybe) 130 grizzlies then was not sufficient for genetic viability. I still feel that way , and scientists have not convinced me otherwise. Talk is cheap. Mitochondrial DNA Analyses is a young science and not the USFWS' strongest suit. Forty years is far too short of a genetic interval to be manufacturing conclusions. Besides, the Yellowstone Grizzly is NOT a distinct population or even a subspecie of Ursus arctos . That is a deceit; a biological accounting trick. Sentencing the Grizzly to remain behind an artificial map line as a Distinct Population in a Demographic Monitoring Area is a huge falsehood. Surely Fish and Wildlife knows that Grizzlies are well suited to occupation of many areas of their former ranges and domains in the West . There is a lot of suitable habitat. Why doesn't USFWS have a mechanism to connect Yellowstone bears to the huge Selway-Bitterroot Wilderness of north central Idaho ? There should be provisions for safe passage in both directions from the Greater Yellowstone Ecosystem (GYE) to the Selway via the Red Rock Lakes wildlife refuge corridor. Bears should also be allowed to move up the Continental Divide north and west of Yellowstone towards Canada. The agency should also translocate GYE grizzlies to the San Juan Mountains of Colorado, and areas in northwest Colorado. The Uintah Mountains in northeast Utah should be considered for grizzly repopulation. It is disgusting to me personally that neither Grizzlies nor Grey Wolves are allowed to expand into other areas of my Wyoming without becoming a target for a rifle. The southern Wind River Mountains and Wyoming-Salt River Range deserve bears. A case could be made for the Pryor Mountains on the Montana-Wyoming border and the northern end of the adjacent Big Horn Mountains as new grizzly range. The Crow Tribe has said as much. You should listen to the Tribes on the topic of grizzlies. Frankly , if a Giant Panda bear can be relocated from the bamboo jungles of south China to the National Zoo in Washington D.C. it should be doable to move a grizzly from the North Fork of the Shoshone River at Yellowstone's east gate to the Selway-Bitterroot , a distance of 250 miles by helicopter. In both directions. That the USFWS has not instigated Grizzly Repopulation across the northern Rockies, and the State of Wyoming wants to keep X-numbers of bears inside a Zoo Zone, and not even count any bears outside that Zoo Zone as a component of bear recovery , is a terrible deceit. This one aspect ---lack of landscape expansion opportunities for the Yellowstone bear and lack of genetic connectivity with other bear populations in the Northern Rockies --- is enough to declare Delisting to be null and void. They Yellowstone Grizzly has been branded a Distinct Population Segment strictly for political reasons, and expediency. I reject that. The agency should instead look at the Yellowstone bear both as a sustainable population AND a seed population. Yet Wyoming wants to cull bear numbers to keep them in a Goldilocks gated community of not more than 700 nor less than 500 bears, and that culling will be done by hunting and other human caused mortality , i e. " management actions". Why not relocate ' surplus' bears instead , or if a problem bear raiding the tack shed or apple orchard, put them on unsupervised probation in another state with their electronic GPS necklaces ? Wyoming Game and Fish bear managers have been playing " Musical Bears" for a couple decades now , trapping bears and hauling them to some other release point over the mountain . Sometimes the same bears. Recidivist grizzlies. We have maybe six drop points in all of Wyoming. If we were doing it right, the management agency would relocate bears to 60 drop points across five states. Again , in both directions. Please do allocate the funds to buy a LOT of GPS radio collars. I am not at all opposed to trophy hunting of Grizzlies in Wyoming. I can support that . But only if the agencies agree that expanding and sustaining a growing bear population outside the proposed Grizzly DMA occurs first. We all know that in Wyoming, Grizzly Delisting is a euphemism for Hunting. Fine. So long as all the tools in the management toolbox , not just the .30-06 rifle with 3x-9x scope , are employed across the Big Picture Landscape of Idaho-Montana-Wyoming-Colorado-Utah - and ??? Grizzly Bears are worth far more alive than dead. The proposed delisting plans (state and federal) seem to emphasize more Dead than Alive when it comes to hands-on bear management. It is regrettable the attitude behind that is so baked in to existent wildlife technocrats and bureaucrats, and narrowminded stakeholders. It is almost as bad as the notion that bear biologists and bear managers actually believe they know bears. They...do...not. USFWS and the IGBST cannot justify delisting the Grizzly by saying it has recovered enough to survive the challenges it faces. We all agree there are a good number of bears...600...700...maybe more , maybe less. The problem is the bear's best food supplies in the core area of Yellowstone Park have collapsed...Cutthroat trout and Whitebark pine seeds. The gross supply of ungulate meat is in shorter supply inside Yellowstone as elk numbers decline. Outside the Park in the Absaroka Range alpine scree slopes the Army Cutworm moth larva are diminishing rapidly due to threats from pesticides and the GMO crop cycle in the lowlands and agribusiness areas of the Midwest . Yellowstone grizzly are becoming Absaroka grizzly and preying on more elk calves, and more livestock. Because of all this, the bears are spreading out , and actual bear density is decreasing over units of public lands. What seems like more bears out on the fringe of the GYE and the proposed DMA are bears that are searching further and wider for food sources. Bears have been spreading out since the early 2000's , and the population number probably peaked in about 2006 . The notion advanced by the IGBST that grizzly's " Omnviory " , the ability to eat a wide variety of vegetation in lieu of less animal protein , is a deception. Grizzlies want meat. Plants are a supplement but not a substitute in the bear's preferred diet. Would you as a human omnivore enjoy being forced to eat mostly salads and give up beef. chicken . pork . fish ---- your meats ? Having to work harder and further afield for food is a big challenge to grizzlies. but the	FWS-R6-ES-2016-0042-5487-A1.rtf	

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		...need to get more / seeds and give up deer, chicken / pork / non- year meals / having to work harder and harder since for food is a big challenge to grizzlies, but the real drawdown of bears has been human caused mortalities. We've been killing 50 bears a year for some time...an alarmingly high percentage. The Whitebark pine seed crop has been thin ...not for lack of trees , but because of climate changes and the alien exotic blister rust. BEars simply cannot find the quantity of pine nuts they were having 15 years ago, and the situation is getting worse. When all the factors concerning the bear's food supplies start compounding and cascading, the result is bears coming into conflict zones with humans and their guns. The population dynamic of the Yellowstone Grizzly is at a tipping point, just at the time the humans want to ratchet up all the negative mortality factors affecting bears. The Delisting proposals are designed to do one thing well: reduce bear numbers. And that's about all it does. The IGBST has deluded itself into thinking they have succeeded in recovering bears strictly by the numbers , when in fact the bears are in more danger now than they have been at any time since they were listed back in 1975. It's been a mark of shame that the raw data gathered by the IGBST and their tight circle of researchers has not been fully disseminated to qualified third parties for peer review and analysis. The so-called " Best Available Science" produced by Chris Servheen et al and the IGBST has been built to a conclusion with data massaged and computer models tweaked until it all fits the preconceived political outcome of fabricating bear numbers and management scenarios that appear to show a recovered, feisty, expanding bear population. It all borders on fraud. Besides, it's not about bear numbers , it's about bear habitat. And that is the other Achilles Heel of the proposed grizzly delisting proposal and State plans. There is no provision for sustaining critical grizzly bear habitat requirements. Nothing in the proposals will implore the Forest Service, the BLM , or States to manage for bear habitat. Those agencies will automatically without remorse defer their decisions on behalf of special interests and human stakeholders perceptions. The Grizzly can look forward to more habitat fragmentation and decline of lifestyle should delisting proceed as planned. Forty years ago when the bear was listed under the ESA, you would not have been able to find ten scientists anywhere in the USA who would tell us that Global Climate Change would be a serious challenge in decades to come. Fast forward to today , and we cannot find ten scientists who disagree that Global CLimate Change is not a force majeure to be reckoned with ...in every location on the planet from below sea level to the crest of the Himalayas, on all continents. The Yellowstone Grizzly is already adversely affected by climate change , and it's not going to get better in the lifetimes of anyone reading this. Which is why strong habitat protections and enforced regulations of landscape scale issues are paramount. Too bad none of that is in the delisting proposal . The Yellowstone Grizzly's survival into the next century depends on us making the right decisions today . The Great Bear must be allowed to disperse into several surrounding states from the Yellowstone core. That dispersion must be both natural , without undue impediments. And where and when necessary we humans must relocate some numbers and demographics of bears further afield and return virile bears to the core to replenish the gene pool. I see little to nothing in the US Fish and Wildlife's intentions or the state of Wyoming's draft grizzly management plan that would guarantee the survival and virility of the Grizzly Bear in the face of the challenges it faces. I see a People Plan and a whole lotta delusional science, and some deleterious agendas at work disguised as " management". What I do not see is a genuine Grizzly bear Recovery Plan going forward that is actually based on bears, as one would think it should be. Therefore, management cannot be turned over to the States, and Fish and Wildlife as stewards of Endangered Species must retool their thinking a produce a Grizzly bear sustainability plan that puts the bears themselves at the top of the priorities. I reject the proposed Grizzly bear Delisting for all these reasons stated here, and more. Sincerely ; Dewey Vanderhoff Cody Wyoming - submitted electronically May 10 , 2016		

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How can we remove ESA protections and turn management over to the states, who want to immediately begin sport trophy hunting of grizzly bears and who refuse to let grizzly bears access prime, biologically-suitable habitat on federal public lands?	Factor D	Iâ€™ve been following the debate regarding USFWS proposed rule to delist Greater Yellowstone Ecosystem (GYE) grizzlies. There is so much information documented about the problems with this proposed rule, I wonâ€™t include those details in this letter. By now, you should have received a letter from Jane Goodall, E.O. Wilson and signed by over sixty leading biologists, strongly opposing the delisting of the GYE grizzlies. I urge you to listen to these experts. The plan is premature, fails to address the numerous risks this population will continue to face and does not provide adequate protections to ensure the long-term survival of this iconic species. When I first heard about the delisting - it caught me off guard. Iâ€™ve spent considerable time over the past few years learning about the plight of the elephants in Africa and supporting efforts to protect this incredible animal. I applaud the efforts of the Department of Interior to support conservation in Africa and around the world. But it is troubling to me that while we see the value of preserving the Big 5 in Africa we are at the same time willing to jeopardize our hard fought gains with the GYE grizzly. How can we remove ESA protections and turn management over to the states, who want to immediately begin sport trophy hunting of grizzly bears and who refuse to let grizzly bears access prime, biologically-suitable habitat on federal public lands? The proposed rule does not even protect grizzlies moving between the parks or grizzlies that may wander out of the park in search of food. Bears trying to disperse would be subject to hunting and removal, making connecting the GYE population with the northern population of bears impossible. Rather than making it harder for the populations to connect, we should redouble our efforts to help GYE grizzlies expand their range to connect with the northern grizzly population. Please do not remove the grizzly bears from protections under the ESA.	FWS-R6-ES-2016-0042-5662-A1.pdf	
		YP`ziÃ©science for a changing world Fomxcmc Bumvion or Noam AMuucAu Bums David J. Mattson P.O. Box 5614, BLD 24 Southwest Biological Science Center		

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WYO, ID, and MT plan grizzly hunts. Bears are easy targets for hunters. Bears forage in open areas. Grizzlies have tracking collars. All it takes is a google search to find 399 and 610's locations. The bears have no way to hide from hunters, & will be easy targets. Grizzlies are tracked and studied for scientific research purposes. Based on WYO, ID, and MT's policies of allowing hunters to kill radio-tracked wolves,the states will not take steps to protect radio-collared groups from hunters, & no way to protect the scientific research the grizzlies represent	Factor D	Flagstaff, AZ 86011-5614 Colorado Plateau Research Station Phone: 928-556-7466 x 245 Northern Arizona University Email: David Mattson@usgs.gov Predation on Land-Dwelling Prey Even though all three North American bear species can be predators, the grizzly bear is more likely to kill larger terrestrial prey; either because of opportunity (compared to polar bears) or aptitude (compared to black bears). An adult grizzly is large enough to kill most adult ungulates, and equipped with claws, teeth, and power sufficient to deliver a killing blow. I\ eat's ready digestibility also means that the typical bear will reap considerable rewards from predation. Bears locate larger land-dwelling prey, such as deer, elk, and moose, by a variety of methods and with varied intent. A certain number of encounters with potential prey are strictly by chance, apparently without deliberate stalk or search. This is typified by one incident where two grizzlies approached some elk behind a blind rise, without either species being aware of the other's presence. However, as soon as the elk came into sight, one of the bears lunged after them, but without success. This unfruitful result probably characterizes the vast majority of these chance encounters, however there are enough recorded kills in rolling terrain or otherwise visually opaque conditions to suggest occasional success under similar circumstances. On the other hand, the majority of observations suggest that both black and grizzly bears most often encounter their prey either after a deliberate search, characterized by movement in the direction of the hoped-for kill, or, with even greater forethought, by putting themselves in areas with concentrations of vulnerable prey. Elk and caribou calving grounds or traditional caribou river crossings are good examples of such areas where, either because of extreme young age, the preoccupations of birth, or the mass confusion of swimming animals, otherwise elusive ungulates become easy prey. This is most dramatically borne out by several graphic descriptions of observers such as Adolf I\ urie, Harry Reynolds, Kerry Gunther, and Steve and I\ arilyn French, of contemporaneous pursuits, kills, and confrontations by grizzlies concentrated on calving grounds in Alaska and Wyoming. Bears clearly use all of their senses to track down prey. However, most observations suggest a prominent role for olfactory and audio cues. Bears have often been observed following scent trails associated with potential prey, sometimes for miles, or more convincingly, been seen killing calves at the culmination of a complex search mostly with nose to the ground. There are other phenomena that argue anecdotally for the prominence of hearing in tracking down meat. A number of hunters bugling for elk have surprised themselves by soliciting the apparently predatory interest of a grizzly bear. Concordantly, there is a consistently observed tendency world-wide for increased bear predation on both bull elk and bull moose during their fall ruts. Bears also seem to be attracted to the sound of gun-fire during the hunting season, one can only suppose with the intent of scavenging the gut pile and other remains of a hunter's kill. Although this likely orientation towards sound has not been conclusively demonstrated, it remains an intriguing possibility worthy of further study. Bears can chase down prey in open country, and are more successful at this tactic after separating a young calf from a cow-calf herd. Capture usually occurs after the pursuing bear cuts the corner on a fleeing calf that has been foolish enough to turn. However, most successful bear predations are not the result of long pursuits, but rather the result of a short-range rush either from ambush or after a stalk. Given the relative slowness of bears, at least compared to most wild ungulates, there is a distanceForaging Behavior ofBears . Mattson 2 at which this rush is more likely to be successful or, if not, then terminated. A number of records by different observers in different areas suggest that this "optimal" distance is around 20-50 m. Without the aid of mitigating conditions or tactics, it would be difficult for a bear to get this close to a reasonably alert and healthy ungulate, and so it should be no surprise that most kills are associated either with cover, conditions that hinder prey mobility, or the afflictions of exhaustion, disease, or raging sexual hormones in their prey. Thus, many documented predations have been in or near the edge of willow thickets and dense timber, often near running water; presumably under conditions that facilitate the unobserved approach of a predatory bear. Other predations occur on forest game trails, often as the prey negotiates deadfall or a small draw; under conditions where temporary imbalance or distraction would favor a successful ambush. Otherwise, bear researchers throughout the northern hemisphere have noted the remarkable success of bears preying upon winter-weakened ungulates in spring snow conditions. Surface crusts form that can support the weight of a broad-footed bear but not a larger-bodied ungulate such as an elk, moose, or muskox. Under these conditions the delivery of a killing bite is more often a constraint than over-taking the prey. Similarly, exhausted and/or hormonally-deluded bulls seem to make relatively easy bear prey during and after the fall ruts. One extraordinary story from Siberia recounts a brown bear that lured a rutting bull moose into a willow thicket by imitating the bull's mating roar. Grizzly bears kill land-dwelling prey primarily one of two ways. I\ lost often they maneuver to approach over the back, after which they grab the animal around the rib-cage and, if successful, deliver a killing bite to the back of the neck or skull. A bite to the small of the back may be a prelude to this finishing move, or an animal that escapes the first attempted neck bite may be severely wounded on the flanks by the bear's claws as they are disengaged from their hold. An approach from the rear is also the logical consequence of a chase, and on occasion the bear may use its weight to collapse the hind-quarters of an animal that has just been caught. The next most common kill technique involves a bite to the nose and face that at least paralyzes and possibly kills the animal. Either way, the animal does not offer subsequent resistance. Interestingly, there are only a few reports of bears delivering killing or debilitating blows with their paws, and in most cases their paws come into play for such things as pinning down a newly-captured calf or grasping larger prey to facilitate delivery of a killing bite. Bears are able to consume between 12 and 40 kg of fresh meat in a day. However, consumption is not indiscriminate and typically reflects marked preference for some carcass parts. Almost universally, the most favored or at least first eaten portion of a female is the udder. After that, most bears eat the brisket and adjacent rib meat or the meaty proximal part of the front legs. I\ lost carcasses are cleanly eviscerated soon after they are killed or found by a bear, with the heart, liver, and lungs selected for priority consumption. The skin, hair, rumen, and stomach are the most consistently unused soft parts of a carcass. In fact, a more-or-less neatly peeled off hide is one of the more diagnostic signatures of bear involvement. Bears are also one of the few consumers that can readily crack the major leg bones of a larger ungulate in pursuit of the marrow. Some bears even get into the habit of cracking the skull so that they can consume the brains. There are other features that distinguish carcass use by grizzly bears. If there are enough edibles to warrant the investment, a bear will typically bury the entire carcass or selected parts of it by scraping adjacent soil and litter over the tidbit with its front paws. Presumably this inhibits decomposition and the dissemination of scent that might attract competitors. As further sign of ownership, you might even find a bear sprawled directly on top of a carcass, attempting to rest while at the same time prevent pilfering by other scavengers. A bear may also move an intact or even partly consumed carcass to a spot more to its liking. If the carcass is not fresh, a drag trail of shed ungulate hair will connect the new carcass location with the rumen contents left at the original site of death. In addition, there are often bear beds nearby and a bear trail leading to the nearest available water (an apparent necessity when consuming such a protein-rich diet). As a final note on this type of predation - grizzlies exhibit marked preference for different sizes and species of ungulates. They are least likely to attack very large herd-dwelling animals that rely upon aggression for predator defense, epitomized by bison. Among the larger ungulates, they seem most likely to attack moose, presumably because of a solitary forest-dwelling existence that lends itself to ambush. However, within any given medium- to large-bodied prey species, bears	FWS-R6-ES-2016-0042-0513-A3.pdf	

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		preferentially prey upon young animals, especially the highly vulnerable neonates. On the other hand, although they are not		
		YP'ziÄ©science for a changing world Fomxcmc Bumvion or Noam AMuucAu Bums David J. Mattson P.O. Box 5614, BLD 24 Southwest Biological Science Center Flagstaff, AZ 86011-5614 Colorado Plateau Research Station Phone: 928-556-7466 x 245 Northern Arizona University Email: David Mattson@usgs.gov Predation on Land-Dwelling Prey Even though all three North American bear species can be predators, the grizzly bear is more likely to kill larger terrestrial prey; either because of opportunity (compared to polar bears) or aptitude (compared to black bears). An adult grizzly is large enough to kill most adult ungulates, and equipped with claws, teeth, and power sufficient to deliver a killing blow. I\ eat's ready digestibility also means that the typical bear will reap considerable rewards from predation. Bears locate larger land-dwelling prey, such as deer, elk, and moose, by a variety of methods and with varied intent. A certain number of encounters with potential prey are strictly by chance, apparently without deliberate stalk or search. This is typified by one incident where two grizzlies approached some elk behind a blind rise, without either species being aware of the other's presence. However, as soon as the elk came into sight, one of the bears lunged after them, but without success. This unfruitful result probably characterizes the vast majority of these chance encounters, however there are enough recorded kills in rolling terrain or otherwise visually opaque conditions to suggest occasional success under similar circumstances. On the other hand, the majority of observations suggest that both black and grizzly bears most often encounter their prey either after a deliberate search, characterized by movement in the direction of the hoped-for kill, or, with even greater forethought, by putting themselves in areas with concentrations of vulnerable prey. Elk and caribou calving grounds or traditional caribou river crossings are good examples of such areas where, either because of extreme young age, the preoccupations of birth, or the mass confusion of swimming animals, otherwise elusive ungulates become easy prey. This is most dramatically borne out by several graphic descriptions of observers such as Adolf I\ urie, Harry Reynolds, Kerry Gunther, and Steve and I\ arilyn French, of contemporaneous pursuits, kills, and confrontations by grizzlies concentrated on calving grounds in Alaska and Wyoming. Bears clearly use all of their senses		

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The public comment period for this rule is open & WYO is pursuing a public comment period to establish trophy hunting of the grizzly bear, & comments close on April 14, 2016. WYO is assuming that the USFWS is going to allow trophy hunting because a few people desire to kill. I am a Wyomingite, and the third generation of my family to be born in Wyoming, and I oppose hunting the grizzly bear. WYO is working with ID & MT to divvy up bears for hunters. The protections the 3 states offer to sows with cubs is ineffective. Even if states criminally charge those who illegally kill the grizzly, which is unlikely based on the history of failure to prosecute such crimes, penalties are not sufficient, and a hunter who wants to kill a mother grizzly is going to do so anyway. WYO is relying on outdated data to support its management proposal for bears	Factor D	to track down prey. However, most observations suggest a prominent role for olfactory and audio cues. Bears have often been observed following scent trails associated with potential prey, sometimes for miles, or more convincingly, been seen killing calves at the culmination of a complex search mostly with nose to the ground. There are other phenomena that argue anecdotally for the prominence of hearing in tracking down meat. A number of hunters bugling for elk have surprised themselves by soliciting the apparently predatory interest of a grizzly bear. Concordantly, there is a consistently observed tendency world-wide for increased bear predation on both bull elk and bull moose during their fall ruts. Bears also seem to be attracted to the sound of gun-fire during the hunting season, one can only suppose with the intent of scavenging the gut pile and other remains of a hunter's kill. Although this likely orientation towards sound has not been conclusively demonstrated, it remains an intriguing possibility worthy of further study. 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The State has no funding in place to take over this program. The amount of time, energy and management to protect and enforce illegal hunting and poaching, is beyond comprehension, and Montana wildlife officials have announced, through their Â draft grizzly hunting regulationsÂ that, once approved, they would offer \$50 permits to local residents and \$1,000 permits for out-of-state hunters to shoot the bears.Â Â The state's grizzly hunting plan would be implemented if the bears are takenÂ off the federal endangered species list. This is outrageous, and telling of what Montana has in place for Grizzly bears, once delisted. Again, we have seen what our state has done and continue to do with our wolves as they kill more packs and individual wolves to satisfy sport hunters, trappers and the livestock industry.	Factor D	I live in Grizzly territory, and adamantly oppose the idea of delistingÂ the Greater Yellowstone Area (GYA) population of grizzly bears from the List of Endangered and Threatened Wildlife. Officials are expecting more visitors this year as the National Park Service celebrates its 100th anniversary. During this summer (2016) I would like you to survey all of the people coming in from around the world, who spent nearly half a billion dollars in communities around the park in 2015, how they feel about seeing this iconic predator hunted and killed for sport. Not harvested, but killed for sport. I believe the outrage at the illegal killing of bear # 211 also known by the public as Scarface, is most telling of how we feel, but if that is not enough for the Service to listen too, then this survey that is attached, provided by the HSUS and WWA may make it clearer, how Americans really feel. Â Grizzly bears are an iconic species, representing the natural beauty and magnificence in many of our country's last remaining wild spaces. This also holds true for wolves and bison and we have seen what has happened to both of these species since delisting. They are lured outside of the Park boundaries, and killed. The poll, conducted by Remington Research Group on behalf of The HSUS and WWA from April 7 through April 9, 2016, surveyed 3,087 voter participants. The survey was weighted to match expected turnout demographics for the 2016 General Election, with margin of error plus or minus 2.2 percent with a 95 percent level of confidence. http://www.humanesociety.org/news/press_releases/2016/04/opposition-yellowstone-grizzly-delisting-041216.html?credit=web_id738419534 The State has no funding in place to take over this program. The amount of time, energy and management to protect and enforce illegal hunting and poaching, is beyond comprehension, and Montana wildlife officials have announced, through their Â draft grizzly hunting regulationsÂ that, once approved, they would offer \$50 permits to local residents and \$1,000 permits for out-of-state hunters to shoot the bears.Â Â The state's grizzly hunting plan would be implemented if the bears are takenÂ off the federal endangered species list. This is outrageous, and telling of what Montana has in place for Grizzly bears, once delisted. Again, we have seen what our state has done and continue to do with our wolves as they kill more packs and individual wolves to satisfy sport hunters, trappers and the livestock industry. TheÂ UFWS tried to de-list grizzly bears in 2007 but environmental groups sued. In 2009, a federal judge in Montana ruled that Yellowstone grizzly bears should continue to be protected because not only were the safeguards promised by the USFWS unenforceable, but due to climate change, bears were losing a major part of their diet due to white bark pine trees dying off. Now in 2016, we are all knowledgeable that this is happening, and the climate change predicted, has happened. Denying this fact in your Draft Proposal, does not change reality. As such, you can be assured that litigation will once again be forth coming. In closing, I strongly agree with all points presented in this letter, presented by Jane Goodall and signed by prominent scientists and knowledgeable bear experts that have been delivered to Sally Jewell, Secretary U.S. Department of the Interior and Dan Ashe, Director, U.S. Fish and Wildlife Service. https://drive.google.com/file/d/0B7Ec-KrsWzt4Q0NnWlVrV3JqU1k/view GB-ScientistFinal5-5-16.pdf	FWS-R6-ES-2016-0042-5173-A1.doc	

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Look at Wyoming’s plan to only allow wolves in a small part of the state. Look at Idaho that says they are doing elk studies in the Frank Church River of no Return Wilderness with helicopters and it turns out it was only to hunt wolves? Look at Montana where wolf hunting rules are being relaxed and new manners of killing them is looked at every legislative session?I do not trust these states to wisely manage Griz. Past hunting got the bear listed. While the public in general wants top predators on the landscape, local ranchers and hunters do not like top predators. Ranchers with federal grazing leases hate predators and will shoot more of them without federal protections.	Factor D	5-9-16 To whom this does concern, Please accept these comments on the premature Grizzly bear delisting that is proposed the USFWS. I am very supportive of delisting Grizzly bears if the population, habitat and food sources are secure to allow for populations to reach historic levels and fill historic habitat . As it is now the USFWS and states are satisfied if the population is well below the historic population of 50.000 Grizzly bears. The listing is unwarranted because the population to be unlisted is small and does not include the historic range of the bears. The piecemeal delisting in one small area of the historic range will not truly recover the species. Griz should not be delisted around Yellowstone National Park when Grizzly bear are not present or struggles to survive in 98% of their historic range. Canada has for many years been looked at as a genetic supplier for many species into the US. The population of Grizzly in Canada is also decreasing due to loss of habitat , roads, oil and gas development, mining and hunting, housing, ranching, farming, etc. These are the same pressures and demands that the US puts on historic Grizzly bear habitat. This delisting will create an island with delisted bear that will become inbred as wildlife corridors have not been determined and protected from fragmentation, road building and human growth in valleys as is easily seen in the included maps. Until hard management strategies are in place to limit human activity (hunting of Grizzly, road building, climate change, trash storage, grazing, weeds, logging, human development of valleys and a basic understanding that Grizzly bear do not have other places to live) any delisting will be the end of this top predator . People need to understand that they live in Grizzly bear habitat out of choice. Grizzly bear do not have this choice of where to live . People need to stop being so self-centered and become educated on how people must change their behaviors to accommodate the needs of Grizzly bear to survive in the long term. The USFWS needs to take on this challenge to educate people on the needs of Grizzly bears and actions that are required to enhance and enlarge places that grizzly bear can live in safety . Hunting: The hunting of Grizzly bear is unacceptable for any reason. The Grizzly bear need to have the same protections as Bald eagles where the eagles are delisted and people cannot hunt them. The states protection of Grizzly bear did not work in the past and will not work in the future without mandates from the USFWS that any future delisting will not allow for hunting until the population reestablishes historic populations of 50,000. A population of 600 Griz is too small to be a viable population. I doubt that the USFWS would consider at a population of 600 humans in the greater Yellowstone as viable if there were only 1200 ,+/-more humans in the lower 48 states. The reason a hunting ban is imperative is due to listening to a Montana Fish Wildlife and Parks employee saying “that deer populations are increasing in Montana and we hunt them. And the Grizzly bear will do fine hunting them too .” The mindset that Grizzly bear are like deer is ludicrous. Also whitetail and muley deer populations are doing fine in cities, but not so well in most of Montana. Blue tongue disease and loss of habitat are harming deer populations. Fish Wild and Parks treats predators differently than ungulates. If populations of wolves are not reduced to “acceptable” levels, the hunting season is increased and new hunting methods are allowed. This includes trapping, increase in numbers of wolves allowed by one hunter to take, silencers, etc. This is not done with deer and elk. FWP and federal trappers do not go out and slaughter a herd of elk or deer with aircraft because hunting targets were not met, they were a threat to cattle or they were too close to my cows. I fear that Griz will be treated as wolves since 600 bears is our target population to keep the Griz off the ESA and this is our target. We will allow for hunting, bear baiting, etc to keep bear at this population at all costs. Delisting of wolves has not gone so well in Wyoming and the mid-west, at least according to federal judges. Federal funding for Grizzly population surveys will stop after 5 years. Will it then be left up to the states to monitor Grizzly Bear? Is there a funding mandate placed on the states to monitor the Grizzly populations? Economics: There has been new economic information on the value of Grizzly bears for tourism. The study showed that Grizzly bear are an economic driver for tourism. Hunting Griz will hopefully create tourism boycotts. Disease: Due to the small population of grizzly bear, islands of bear habitat and global warming, it is possible that the Yellowstone population could be decimated with a disease that the bear would never recover from. 700 bear are too small of a population for long term survival. How does delisting now respond to issues of disease? Isolated populations: Unfortunately politics punched a hole in the ESA when Senator Testor put a rider on wolf delisting. Up until that point, whole populations needed to be at least stable growing throughout species historic range before delisting could happen. The delisting of pockets of Griz when the bear are not established in their historic range is shortsighted. How are the bear doing in the Cabinet Yaak. How will the bear do around Glacier long term when one looks at human development? What is the acceptable population numbers and habitat that the USFWS has determined for Griz to be delisted in the lower 48 states? Look at all of the human growth in the Madison, Gallatin and Paradise , Boulder and Redlodge Valleys. How does this growth allow for Griz to re-inhabit historic ranges? Food sources: The diet of Griz around Yellowstone NP has changed drastically. The bear have lost whitebark pine, cutthroat trout and moths as a major high nutrient food source. As a result their diet has needed to change. How will delisting these bear now protect future bear generations if they lose other food sources? Is there enough habitat and human tolerance for Griz that will allow for Griz to use new habitat for new food sources? How will delisting effect Griz if the bear take cattle on federal grazing leases? New threats: The new threats come from the same old major threat-humans. Without the ESA protections it will be difficult for policies to be put in place quickly to protect Griz. Look how long it has taken to establish viable Bull trout critical habitat? Habitat loss: Growth around national parks and wilderness areas are the fastest growing areas in the west. People want to live in nice places. Unfortunately griz do not have the latitude or ability to move to many places in the west and survive. They have been pushed in the past to places that people did not want to live. They were plains animals. I have included maps of population growth in the Flathead from 1970-2010 and these maps clearly show habitat loss. If federal lands are transferred to the states as some people want, how will this political action affect the viability of Griz?? Without ESA protections many shortsighted land management decisions will be made that will reduce habitat suitable for Grizzly bear. In the past even in the 1970s when food sources were bad for Grizzly bear, they could go down in the valleys and find food. With the conversion of the valleys to housing and ranching the bear have lost this source of food in times of drought. As global warming continues. where is the habitat	FWS-R6-ES-2016-0042-5183-A1.docx	

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		set aside b the states to accommodate this top predator? I am amazed at the growth of humans and change o f wildlife habitat to human dominated habitat from highway building, human housing development, roads from log ging, weeds and the shorter winters in Idaho, Montana and Wyoming since the 1970s. When I project this growth forward, I really do not know where the griz will live in the future. Look at the map of the Flathead in 1970 and then 2010. The growth is impossible to ignore. This growth has happened throughout Griz habitat. The bear was listed in 1975 and look at the loss of habitat and how Montana finally was forced to stop hunting the bear in 1980? Now you want to leave it to the states to manage Grizzly bear ? Griz are not deer. Global warming: From 1978- 2000 there were over 30 more frost free days in Montana. It does not get down to -50F anymore. Forest fires and lower and less snow pack will be more common. How does delisting the bear now protect them in the future as their present habitat will be unrecognizable in 20-30 years? Hunting: There is no rational reason the hunt Griz again. I have hunted in the past and do support hunting. But not for Grizzly bear. They reproduce too slowly and there are too many human caused threats present and unforeseen future ones to allow for the states to hunt them. Look at Wyoming 's plan to only allow wolves in a small part of the state. Look at Idaho that says they are doing elk studies in the Frank Church River of no Return Wilderness with helicopters and it turns out it was only to hunt wolves? Look at Montana where wolf hunting rules are being relaxed and new manners of killing them is looked at ev ery legislative session? I do not trust these states to wisely manage Griz. Past hunting got the bear listed. While the public in general wants top predators on the landscape, local ranchers and hunters do not like top predators. Ranchers with federal grazing leases hate predators and will shoot more of them without federal protections. What will happen when a hunter wounds a bear and the bear gets pissed and starts killing people? Bear are not deer. There is no reason to hunt bear. It will encourage poaching, allow for ranchers and farmers to shoot bear on sight and unfortunately lead to the bear's eminent demise. Please do the right thing for future generations and stop the delisting of Grizzly bear until there are stable populations in the Frank Church and Selway-Bitterroot Wilderness Areas, the CM Russel, Washington, Idaho, Oregon and California(the bear is on their state flag). As you know top predators improve habitat for all species. Including humans. The piecemeal approach to Griz delisting is short sighted and will fail the species that the ESA was designed to help. Thanks for your time , Stephen Braun PO Box 5614 Whitefish, MT		
State fish and wildlife departments programs to protect grizzly populations should be questioned. States are strapped with declining budgets and cannot afford monitoring required. They also bow to pressure from special interest groups who even sit on game	Factor D	jÃ©yziz FdfciÃ©ba Ah_.â€œ= E"J- MQIJQLQ H,OIQTI L; ___ ` 4 T Â· M0 D - Â°Â¢Â·*Ã©n.s On, __,-â€” _! ***5* Spd O 7"ggg "TL J ,. PMGRRMG B6 STRAP- =Â· ,0 .. __ Safe" G0 QROOLUSBJRK,. :_ _ it 'V\g_ BAJOAGP- kg P6 cock-S L- COT TD _rf](LT' Â°*JJÂ·!Â¾Q,H is *9. QT')? 1g.kce MQ mwn gg gv I- .J â€”Â¾ __ mi {- .-, __ yl. LLYLE/3 vv Afrunctstu \$L)lâ€™Â¾ll1â,~ .â€” :1 Z ' V' L J , â€”Â· 7.; Â·â€” I kA Â» IT. ('! . . T1. . M V 1Â·Â»I 1 ai it C) Â·Â· V1 II _ , 3; Â»- , __. I t_ J" Ig ; OU O dlâ,~ W V. " * 5 . h _ , I j _ QQQ â€”"- - I _ . I _ - bear inxcmxzicxu will iucrusz, and I IIIIIIIIIIEBIBII __ _ EXIIFBSSYDIIUVIEYlwm me ,2 \$â€™ 3Â¾~vÂ¾Â¾rÂ¾=Â¾Â¾vÂ¾1rÂ¾1uÂ¾hÂ¾srÂ¾=u:Â¾diÂ¾ mmzÂ¾.2Â¾Â¾s angdymusgnm _ ; dÂ¾Â¾bliÂ¾uhÂ¾bÂ¾:rpÂ¾pulÂ¾:iÂ¾Â¾iÂ¾Â¾hÂ¾ mÂ¾Â¾Â¾Â¾:Â¾Â¾Â¾my`sÂ¾Â¾nÂ¾Â¾Â¾Â¾»Â¾q emmpmmmuwmuwm * I ldl Cnurpirnmy, sÂ¾sÂ¾Â¾cÂ¾1theserÂ¾m.arhÂ¾bleÂ¾Â·canuns. IIIII rythe Urwnqcity Rnher um dnuuiug the gziulymi P wYÂ¾Â¾Â¾Â¾8 mumshmaldbelpohngfcrwzystc QQ ngicmtntthemnhmmdwhidnmmm lm isolmd, and Lha:muÂ¾abÂ¾Â¾ch1Â¾wledgÂ¢daÂ¾dÂ¾Â¾1eÂ· gzlzebennrwÃ©naiihuuwgfug mg thrÂ¾Â¾Â¾Â¾thÂ¾u:hab:Â¾1md{Â¾Â¾dsup- bmzd. wÂ¾#.h1argerÂ¾Â¾d1Â¾;Â¾Â¾:Â¾,mddÂ¾veL I I Huwever,!huna:e:nÂ·l:..Â¾ycÂ¾mpe1- oping biological cnrridcrs between lfiÂ¾*YPÂ¾pu11dcÂ¾sÂ¾Â¾helpeÂ¾n;re Â· leszupmupremagumtztgagdpw genetic and the Thzgrizrly bÂ¾uÂ·,perh.:pamnm I IIS:rv:cetÂ¾Â¾haÂ¾In:Ilc:1:thÂ¾dc11sÂ¾ngplan pgpulaumrpmjmmbkutngcqdc	FWS-R6-ES-2016-0042-	

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commissions. States need revenue from highly prized game licenses. States have declining game and species only react when faced with endangered species act. Which is why we got to this position forty plus years ago.	Factor D	tlunanyÂthÂÂw1dHfÂspcdÂ,z:prcÂÂ grumturc. upubliccomment scnmhzwilduneslhatshapedusu Â InmIIII0d has beam mmdqd through andsecuudgndthudaguusmswunInfx an Ameriunpcupln, and it summa lÂgÂpu.latcad:smui:Âd.InbreedÂ iugpamnuaadzuttnthegunetindi- vcmry cnt lhjw jug, mgm, 1 e-mdlthurcuncurusdunngtheinal Whi.lebÂ.Âh1YellÂçpvgtm1efccdm m' human development, :1 m in sÂmnvÂyscmÂlqnedh1ÂÂÂiÂgth:y 3 tmdcrstandthatthurmctstucnual sÂ]lÂËivciÂg:uÂmldÂâ€phyiÂguixh gf FW lf lilies; beartgthe plglawuealscszmfastiugcude- blisumngnacaidguailyimpnnnd lik wnhymfm S : uyms whale causes almg l cnuzimdleabenrbeingchased T iu_ thc_ prÂÂÂn.lÂsothÂftbeseth:ÂgzÂ l . wiped out loud pnpuladmu, until ruchzblz [gm l I mqwptbuamdmmnamyvmau MgecutmenmgnumdbeetleIntu- l l l BCOIDQGIBEEFEWYQDNQIE. ÂuÂÂ;NÂ\Âup:..SmdiÂbyÂhÂNaz- uillnnededtamslrethazirrunaim l ll Montana. l Âa ixxmchfnrcurchildnnmdgrmd- WTÂ.Â=Â zrmba nuvumy men uhikkm. l Â.Â The Endmgezedspedukz has l llgsoduuepgzladcnwaqcnimaradu l .- bean. tnqnordmatedeinru bemint.heg:Ât:rYcJ1ÂustÂx1zc:Â- ' Â qÂmandnedl5rthÂEÂ\$A,gmÂpgÂ- cunglgmnmaumunsejiinqcdud hahna: fungmiznadanmmnvepsncwcc mndnuwnthcirmadwncnvuy. ÂÂÂÂystcm_ uu wwwmwuuw . . y Hcrmgdmgu r lub; Pl fmarwimzduhggÂ'lf' . -'	5674-A1.pdf	
		As a resident of the state of Idaho, I know first hand Idaho state agencies do not have the moral gumption or leadership to â€œmanageâ€ grizzly bears. The Idaho Department of Fish and Game has proven this with their killing programs associated with wolves. They have also proven their inability to prosecute individuals who kills species protected under the Endangered Species Act. Allowing state agencies to care for our wildlife particularly in Montana, Idaho, and Wyoming has proven fatal and devastating to the health of ecosystems . I concur with the following statement created by the Park County Environmental Council. On March 11, 2016 the US Fish and Wildlife released a proposed rule in the Federal Register (vol. 81, No. 48 , pp. 13174 - 13227) for, Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears From the Federal List of Endangered and Threatened Wildlife; Proposed Rule. Herein referred to as The Rule. Dr. Christopher Servheen, Grizzly Bear Recovery Coordinator, U.S. Fish and Wildlife Service is lead author and primary contact for The Rule . The Interagency Grizzly Bear Study Team (IGBST) is the lead organization responsible for research and monitoring efforts on grizzly bears in the Greater Yellowstone Ecosystem (GYE). There is a public comment period until May 10, 2016. The following are major points are of concern identified with this proposed delisting action. Excessive, unsustainable mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of reproduction is not sustainable. These levels of mortality have occurred even with federal protection of the Threatened and		

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Allowing state agencies to care for our wildlife particularly in Montana, Idaho, and Wyoming has proven fatal and devastating to the health of ecosystems . Â	Factor D	ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection of the threatened and Endangered Species act. Removing T&E protection and placing it in the hands of the three states of Idaho, Montana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Climate Change Impacts The impact of climate change on Yellowstone's grizzlies is summarily dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the blithe statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high-elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has . Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). An alternative , and more reasonable, hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement for "best science" as required by law. Genetic viability The Greater Yellowstone grizzly population is isolated from all other grizzly populations (pp . 1319 0-13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly population is seriously flawed and violates the requisite principle of "Best Science." Population Estimates Accurately estimating the number of bears in a large, rugged area like the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review. Scientific Accountability The IGBST has been less than transparent about making taxpayer funded data (which they have maintained an exclusive monopoly) available for scrutiny by the larger scientific community. All raw data on grizzly bears collected by government agencies should be made available to independent scientists. In view of the wide disagreement about delisting decisions, the USFWS should establish a review panel of independent, academically qualified scientists who are not involved in current grizzly bear research in the GYE. I also take issue with delisting the grizzly bear and opening up its population to hunting pressures. Grizzly bears are NOT recovered. Their gestation cycle is slow. Viable population numbers will be impossible to maintain with open season hunting. The vitriolic hate for grizzly bears and fear alone threaten the species. I have hopes that one day, grizzly bears will eventually repopulate the Selway Bitterroot Wilderness in north-central Idaho. This will never be possible if the State of Idaho is left to care for our bears. People will shoot the bears all in the name of generating revenues for the State of Idaho.	FWS-R6-ES-2016-0042-5313-A1.docx	

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Trophy hunting grizzly bears would further jeopardize their persistence. Pursuant to a tri-state memo, Northern Rockies states have allocated bears for the purposes of "discretionary mortality available for regulated harvest" within the Demographic Monitoring Area (DMA) as follows: Wyoming would authorize hunting for 58% of the bear quota, Montana 34% and Idaho 8%.9 The number of grizzly bears states will permit for trophy hunting is unknown. While Wyoming has issued a draft grizzly bear management plan, it would inadequately protect GYE grizzly bears in the absence of a federal ESA listing because it gives broad discretion to the Wyoming Game Commission to set the manner of take (e.g., baiting, hounding, trapping, stalking), bag limits, seasons, sex ratios and age limits for grizzly bear hunting.'° How Idaho or Montana will permit grizzly bear hunting is also currently unknown.	Factor D	We, the undersigned scientific experts, are writing to express our strong opposition to the proposal by the U.S. Fish and Wildlife Service (FWS) to remove the grizzly bears (Ursus arctos horribilis) living in the Greater Yellowstone Ecosystem (GYE) from protection as a threatened species under the Endangered Species Act (ESA), leading to Northern Rockies states' commencement of an unsustainable trophy-hunting season on GYE grizzly bears, which continue to be imperiled by resource declines, including habitat and dietary staple losses. GYE grizzly bears are not recovered. Before 1800, approximately 50,000 grizzly bears roamed the lower 48 states between Canada and Mexico. After European settlement, humans heavily persecuted grizzly bears to near eradication. Today, wild grizzly bears number fewer than 1,700 individuals in the lower 48 states while FWS claims that there are 700 grizzly bears in the GYE,° this is a contested figure.? Grizzly bears have not recovered across a significant portion of their range, and thus they are not recovered and should not be delisted. Trophy hunting grizzly bears would further jeopardize their persistence. Pursuant to a tri-state memo, Northern Rockies states have allocated bears for the purposes of "discretionary mortality available for regulated harvest" within the Demographic Monitoring Area (DMA) as follows: Wyoming would authorize hunting for 58% of the bear quota, Montana 34% and Idaho 8%.9 The number of grizzly bears states will permit for trophy hunting is unknown. While Wyoming has issued a draft grizzly bear management plan, it would inadequately protect GYE grizzly bears in the absence of a federal ESA listing because it gives broad discretion to the Wyoming Game Commission to set the manner of take (e.g., baiting, hounding, trapping, stalking), bag limits, seasons, sex ratios and age limits for grizzly bear hunting.'° How Idaho or Montana will permit grizzly bear hunting is also currently unknown. Under this veil of uncertainty, the FWS is rushing to close the public comment period (ignoring reasonable requests for a deadline extension justified by the voluminous documents released by FWS) in order to rapidly delist grizzly bears for what appear to be more political than scientific reasons. Such action conflicts with the ESA requirement to make listing decisions solely on the basis of the best scientific evidence available and to seek meaningful public comment on listing decisions. Grizzly bears face multiple threats to persistence including the loss of their primary food resources. Currently, whitebark pine seeds, native cutthroat trout, huckleberries, army cutworm moths, elk and bison are either declining and/or are expected to decline in the foreseeable future as a result of habitat loss, climate change, drought, invasive species and other anthropogenic causes. Traditionally, whitebark pine seeds have provided a core dietary staple for grizzly bears. Yet, the whitebark pine, a species the FWS agrees warrants federal protection, is in decline because of a variety of problems! Another key source of sustenance, the cutthroat trout, has stopped spawning in all tributaries of Yellowstone Lake.2 Army cutworm moths, a staple for grizzly bears since the late 1990s, could likely disappear because they nectar on tundra flowers, which are highly vulnerable to global warming. Added to these threats to the sustainability of the GYE grizzly bear population, Yellowstone's Jackson and Northern Range elk herds and its Central Range bison herd are all in decline; Because of warming summer temperatures and drought severity since 2005, M berries have become largely unavailable to grizzly bears. These food failures° whitebark pine, cutthroat trout, huckleberries° have caused grizzly bears to switch to a more meat-based diet, including domestic livestock. As a result, bears have been in conflict with humans, leading to record numbers of lethal actions taken against them." 'His additive mortality harms their persistence.'° Furthermore, biologists have noted that grizzly bear cub production has declined"° perhaps because of more predation on cubs by wolves and other bears as a result of their new dependence upon a meat-based diet., which puts them into greater proximity with other predators, resulting in deadly strife on grizzly bear cubs. The loss of flora and fauna upon which grizzly bears depend in Yellowstone and Grand Teton national parks, in part, explains why grizzly bears are dispersing in greater numbers from park lands to national forests lands, which are grazed by public lands permittees, to search for food. Because of ubiquitous livestock outside of park lands, record numbers of grizzly bears have had lethal encounters."; Worse, if grizzly bears are delisted, the GYE bears who already live or disperse outside of the DMA's artificial boundary will not be counted toward states' population objectives and will likely be subject to persecution. Yet, these dispersing individuals are vital for providing connections between other populations, maintaining genetic diversity and preventing genetic drift and inbreeding depression. While the conclusions of certain studies upon which the FWS relies suggest that grizzly bears have reached their carrying capacity, there is ample support for an alternative theory that bears have lost their historic dietary staples and are now turning to both native and domestic ungulates, putting them in closer proximity to humans, wolves and/or other bears.2° While this shift is occurring it is impossible to predict whether and	FWS-R6-ES-2016-0042-5687-A1.pdf	

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		when the GYE grizzly bear population might reach “reaching capacity”. FWS is not scientifically justified in concluding with certainty that the GYE population has reached long-term stability and is therefore secure for the foreseeable future. There is far too much uncertainty reflected in the current science to justify such a conclusion; rather, the best available science and the precautionary principle demands continued federal monitoring of this vulnerable population, which will only happen with continued ESA protection. The public highly values grizzly bears. In 2015, Yellowstone received 4.1 million visits and Grand Teton had 4.6 million contributing \$890 million to Wyoming’s gateway communities, and \$1.1 billion to Wyoming’s overall economy. These figures greatly outweigh revenues generated by either Wyoming’s livestock or hunting industries? Grizzly bears, in the human economy, are worth far more alive than dead. For all of these reasons, we urge you not to remove grizzly bears from protections under the BSA. Now is the time to redouble grizzly bear conservation efforts, not decrease them.		
If the proposal to delist is successful, the future of Yellowstone’s grizzly bears will be placed in the hands of Montana, Wyoming and Idaho state wildlife managers who have already made clear their intentions to open up the population to trophy hunting. Grizzly bears are an iconic species, representing the natural beauty and magnificence in many of our country’s last remaining wild spaces. This holds true no more than in Yellowstone National Park and the surrounding region, where grizzly bears are cherished by both tourists and locals alike. Killing these animals in order to stuff them for display and bragging rights is shameful and will only setback our efforts to help the population recover.	Factor D	Yellowstone’s grizzlies, once teetering on the brink of extinction, are only now starting to recover. But your recently announced proposal to remove federal protections under the Endangered Species Act is premature and comes at a time where only 700 of these iconic bears are known to exist in the Greater Yellowstone Ecosystem and shockingly only 1,400 to 1,700 bears in the entire lower 48 states. We stand with The Humane Society of the United States in urging you to keep grizzly bears protected. If the proposal to delist is successful, the future of Yellowstone’s grizzly bears will be placed in the hands of Montana, Wyoming and Idaho state wildlife managers who have already made clear their intentions to open up the population to trophy hunting. Grizzly bears are an iconic species, representing the natural beauty and magnificence in many of our country’s last remaining wild spaces. This holds true no more than in Yellowstone National Park and the surrounding region, where grizzly bears are cherished by both tourists and locals alike. Killing these animals in order to stuff them for display and bragging rights is shameful and will only setback our efforts to help the population recover. We cannot let history repeat itself. Grizzlies were once an abundant species in the Yellowstone region but suffered from overwhelming persecution by hunters up until recent decades. This resulted in the need to list Yellowstone grizzlies as threatened under the ESA in the 1970’s when their number dipped to 136 individuals and the population is faced yet again with a threat to its very existence from trophy hunting if this proposal goes forward. Yellowstone grizzly bears still need our help. They continue to face critical challenges such as habitat loss and climate change. Removing protections for Yellowstone grizzlies now will leave the population with little hope of recovery. You and your predecessors have invested too much into the recovery of this national icon to give up on them. Please keep the Yellowstone grizzly bear listed as a threatened species under the ESA and prevent history from repeating itself.	FWS-R6-ES-2016-0042-5694-A1.pdf	

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this statement mandates that “enforceable regulations’ must be promulgated by the States to ensure that the population remains recovered. In my opinion, this means that allowable mortality, by all means, must be consistent with the historic rates of mortality which allowed the population to recover to its current status. Excessive mortality will cause a decline in the population and eventual return to threatened status. Also, suitable grizzly habitat that is currently below carrying capacity still exists in many parts of the ecosystem; particularly in the Gallatin and Wind River Mountain Ranges. State management must allow these areas to be re-colonized by grizzly bears in order to ensure a robust population that is more resilient to climate change. Assertions by the States that grizzly bear occupancy of these areas is “socially unacceptable’ has no basis in fact; this public land and this grizzly population are national treasures that are clearly valued by a national constituency; a handful of local users with grazing rights on public lands, and a handful of State agency administrators who made this assertion, do not represent the will of the American public.	Factor D	Comments on the 2016 Proposed Grizzly Bear Delisting Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. 81 Fed. Reg. 13174 (March 11, 2016). Frank Lance Craighead PhD. 10 May, 2016. I would like to submit this letter, representing my professional opinion as a wildlife and conservation biologist, as part of the public comment period for the proposed rule delisting the GYE grizzly bear (Docket No. FWSâ€”R6â€”ESâ€”2016â€”0042). Comments regarding the uncertainty of long-term population stability due to genetic issues and metapopulation connectivity have been adequately expressed by the American Society of Mammalogists and the Society of Conservation Biology in their joint letter of May 10, 2016. I will restrict my comments to the question of State management of grizzly bears. The proposed rule states that: "The participating States of Idaho, Montana, and Wyoming must adopt the necessary post-delisting management objectives, which adequately ensure that the GYE population of grizzly bears remains recovered, into enforceable regulations before the Service will proceed with a final delisting rule." Grammatical errors notwithstanding, this statement mandates that “enforceable regulations’ must be promulgated by the States to ensure that the population remains recovered. In my opinion, this means that allowable mortality, by all means, must be consistent with the historic rates of mortality which allowed the population to recover to its current status. Excessive mortality will cause a decline in the population and eventual return to threatened status. Also, suitable grizzly habitat that is currently below carrying capacity still exists in many parts of the ecosystem; particularly in the Gallatin and Wind River Mountain Ranges. State management must allow these areas to be re-colonized by grizzly bears in order to ensure a robust population that is more resilient to climate change. Assertions by the States that grizzly bear occupancy of these areas is “socially unacceptable’ has no basis in fact; this public land and this grizzly population are national treasures that are clearly valued by a national constituency; a handful of local users with grazing rights on public lands, and a handful of State agency administrators who made this assertion, do not represent the will of the American public. In addition, demographic and genetic connectivity with other historic population centers of grizzly bears (in the Northern Continental Divide Ecosystem [NCDE] and the Selway-Bitterroot Ecosystem [S-BE]) is an necessary condition for full recovery of the grizzly metapopulation in the lower 48 states: any State management plans must allow for the natural dispersal of grizzly bears between these areas and the Greater Yellowstone Ecosystem: hunting of any grizzly bears within connectivity corridors must be explicitly prohibited. In summary, State management plans must be completed well before the final delisting decision is made so that these plans can be carefully considered to ensure that if delisting proceeds the States will: 1. Keep total grizzly bear mortality within historic limits set since 1975, 2. Allow for the expansion of the population within all suitable habitat within the GYE, 3. Allow for the unhindered dispersal of grizzly bears between the GYE, the S-BE, and the NCDE, and that regulations to accomplish these goals are enforceable.	FWS-R6-ES-2016-0042-5389-A1.pdf	
In summary, State management plans must be completed well before the final delisting decision is made so that these plans can be carefully considered to ensure that if delisting proceeds the States will: 1. Keep total grizzly bear mortality within historic limits set since	Factor D	Comments on the 2016 Proposed Grizzly Bear Delisting Rule: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife. 81 Fed. Reg. 13174 (March 11, 2016). Frank Lance Craighead PhD. 10 May, 2016. I would like to submit this letter, representing my professional opinion as a wildlife and conservation biologist, as part of the public comment period for the proposed rule delisting the GYE grizzly bear (Docket No. FWSâ€”R6â€”ESâ€”2016â€”0042). Comments regarding the uncertainty of long-term population stability due to genetic issues and metapopulation connectivity have been adequately expressed by the American Society of Mammalogists and the Society of Conservation Biology in their joint letter of May 10, 2016. I will restrict my comments to the question of State management of grizzly bears. The proposed rule states that: "The participating States of Idaho, Montana, and Wyoming must adopt the necessary post-delisting management objectives, which adequately ensure that the GYE population of grizzly bears remains recovered, into enforceable regulations before the Service will proceed with a final delisting rule." Grammatical errors notwithstanding, this statement mandates that “enforceable regulations’ must be promulgated by the States to ensure that the population remains recovered. In my opinion, this means that allowable mortality, by all means, must be consistent with the historic rates of mortality which allowed the population to recover to its current status. Excessive mortality will cause a decline in the population and eventual return to threatened status. Also, suitable grizzly habitat that is currently below carrying capacity still exists in many parts of the ecosystem;	FWS-R6-ES-2016-0042-	

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1975, 2. Allow for the expansion of the population within all suitable habitat within the GYE, 3. Allow for the unhindered dispersal of grizzly bears between the GYE, the S-BE, and the NCDE,and that regulations to accomplish these goals are enforceable.	Factor D	particularly in the Gallatin and Wind River Mountain Ranges. State management must allow these areas to be re-colonized by grizzly bears in order to ensure a robust population that is more resilient to climate change. Assertions by the States that grizzly bear occupancy of these areas is "socially unacceptable" has no basis in fact; this public land and this grizzly population are national treasures that are clearly valued by a national constituency; a handful of local users with grazing rights on public lands, and a handful of State agency administrators who made this assertion, do not represent the will of the American public. In addition, demographic and genetic connectivity with other historic population centers of grizzly bears (in the Northern Continental Divide Ecosystem [NCDE] and the Selway-Bitterroot Ecosystem [S-BE]) is anecessary condition for full recovery of the grizzly metapopulation in the lower 48 states: any State management plans must allow for the natural dispersal of grizzly bears between these areas and the Greater Yellowstone Ecosystem: hunting of any grizzly bears within connectivity corridors must be explicitly prohibited. In summary, State management plans must be completed well before the final delisting decision is made so that these plans can be carefully considered to ensure that if delisting proceeds the States will: 1. Keep total grizzly bear mortality within historic limits set since 1975, 2. Allow for the expansion of the population within all suitable habitat within the GYE, 3. Allow for the unhindered dispersal of grizzly bears between the GYE, the S-BE, and the NCDE, and that regulations to accomplish these goals are enforceable.	5389-A1.pdf	
Moving bear-management to the states of Idaho, Montana, and Wyoming would be handing over those few bears to entities with a track-record of irresponsibility. Under the states' plans, the grizzlies would lose 2,100,000 acres -- 23% -- of habitat that they currently occupy in the Yellowstone Ecosystem. Even now, state wildlife officials are projecting the need for "discretionary mortality," a euphemism for trophy-hunting.	Factor D	May 10, 2016 Keep the Bears Listed I urge U.S. Fish & Wildlife Service to KEEP the Greater Yellowstone Area (GYA) population of grizzly bears ON the List of Endangered and Threatened Wildlife. Moving bear-management to the states of Idaho, Montana, and Wyoming would be handing over those few bears to entities with a track-record of irresponsibility. Under the states' plans, the grizzlies would lose 2,100,000 acres -- 23% -- of habitat that they currently occupy in the Yellowstone Ecosystem. Even now, state wildlife officials are projecting the need for "discretionary mortality," a euphemism for trophy-hunting. Minimum Viable Population (MVP) -- Meta-Analysis Says the "Magic Number" Is ~ 5,000 Recent conclusions regarding minimum-viable population (MVP) arose from a meta-analysis of the scientific literature spanning the preceding 30 years. The researchers filtered hundreds of studies and selected 141 sources covering 212 unique species whose distribution was skewed toward heavier animals, particularly mammals. With regard to mammals, the median MVP was 3,876. The "bootstrapped 95% confidence bounds" MVP ranged from 2,261 to 5,095. Conclusion: The study-authors state: "... we recommend the upper 95% confidence limit of MVP...." Surely to be on the safe side, the upper bound of that confidence limit -- 5,095 -- should be the starting-point for an adequate population of Yellowstone grizzlies. The current estimated population of about 717 in the Demographic Monitoring Area does not meet that standard. The link below takes you to an article discussing the meta-analysis' findings -- including an interview with the lead author. The second link leads you to the report itself: http://www.americanscientist.org/issues/pub/a-magic-number/ http://coreybradshaw.files.wordpress.com/2011/03/traill-et-al-2007-biol-conserv.pdf Protect Our Investment in the Yellowstone Grizzlies De-listing is unacceptable and contraindicated. We taxpayers have invested too many millions and so many decades saving the Yellowstone grizzlies from extinction. Their population is still inadequate. The indicated direction is to ... 1. Keep the Yellowstone grizzlies listed 2. Encourage their population to rise at least seven-fold 3. Increase their habitat to include the entire Yellowstone Ecosystem 4. Protect their migration corridors Please do the right thing. Keep the grizzly bears listed. Thank you. Marybeth Devlin 6880 SW 27th ST Miami, FL 33155-2916 marybethdevlin@bellsouth.net -- 305 665-1727	FWS-R6-ES-2016-0042-5398-A1.rtf	

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The reasons against delisting are expressions of accumulated science, the ecology and range management aspects, habitat concerns, and the appalling prospect of allowing the State game agencies to "manage" grizzly bears given their track record and narrow views; e.g. the Wyoming Game and Fish draft plan for management falls apart if the goal is to assure a	Factor D	US Fish & Wildlife Service COMMENT on draft proposal to Delist the Yellowstone Grizzly I am a Wyoming native who lives in Cody , 50 miles from Yellowstone Park on the edge of the Greater Yellowstone Ecosystem. Much of my life has been spent in the backcountry of the Absaroka Range in prime grizzly habitat, and countless hours in Yellowstone Park. I reckon I have had around 200 encounters with and close range sightings of Grizzly bears in my lifetime, all good. The Great Bear is a topic of major concern in my region. I've engaged the state and federal agencies on grizzlies ands other issues for over 40 years. I feel qualified to give a considered opinion on Grizzly management. I am strongly opposed to the Delisting of the so-called Yellowstone Grizzly Bear. The proposal by USFWS to Delist the Grizzly and give management over to the states of Wyoming, Montana , and Idaho is flawed. The only reasons that justify grizzly delisting are political. The reasons against delisting are expressions of accumulated science, the ecology and range management aspects, habitat concerns , and the appalling prospect of allowing the State game agencies to "manage" grizzly bears given their track record and narrow views; e. g. the Wyoming Game and Fish draft plan for management falls apart if the goal is to assure a healthy bear population in the far future. Neither Fish & Wildlife nor Wyo Game and Fish have produced a plan to guarantee the Yellowstone Grizzly's sustainability based on the needs of the bears. All plans put forth are People Plans , not Bear Plans. Best Available Politics, not science , not genuine wildlife conservation. After 40 years and \$ 40 million in research and bear management , I expected a delisting plan that actually helped the bears. Instead we get proposals that cow-tow to special interests and decidedly non-wildlife priorities. It is disappointing that delisting looks like this. We can do better. For an animal that once ranged from Hudson Bay in Canada's northeast , all the way to the Pacific Ocean coast , and south as far as Guadalajara Mexico , the proposal to sustain the Grizzly on an island with a hard population ceiling (700 bears) and a hard population floor (500 bears) with nearly zero opportunity for that island population to expand and interchange with other grizzlies in the Rocky Mountains is patently absurd. I seem to recall back a couple decades ago that USFWS/ IGBST said they would endeavaour to bring in 'outside' grizzly bears to augment the GYE gene pool. I feel strongly that when the Grizzly was originally listed as Threatened under the ESA back in 1975 , the starting population of (maybe) 130 grizzlies then was not sufficient for genetic viability. I still feel that way , and scientists have not convinced me otherwise. Talk is cheap. Mitochondrial DNA Analyses is a young science and not the USFWS' strongest suit. Forty years is far too short of a genetic interval to be manufacturing conclusions. Besides, the Yellowstone Grizzly is NOT a distinct population or even a subspecie of Ursus arctos . That is a deceit; a biological accounting trick. Sentencing the Grizzly to remain behind an artificial map line as a Distinct Population in a Demographic Monitoring Area is a huge falsehood. Surely Fish and Wildlife knows that Grizzlies are well suited to occupation of many areas of their former ranges and domains in the West . There is a lot of suitable habitat. Why doesn't USFWS have a mechanism to connect Yellowstone bears to the huge Selway-Bitterroot Wilderness of north central Idaho ? There should be provisions for safe passage in both directions from the Greater Yellowstone Ecosystem (GYE) to the Selway via the Red Rock Lakes wildlife refuge corridor. Bears should also be allowed to move up the Continental Divide north and west of Yellowstone towards Canada. The agency should also translocate GYE grizzlies to the San Juan Mountains of Colorado, and areas in northwest Colorado. The Uintah Mountains in northeast Utah should be considered for grizzly repopulation. It is disgusting to me personally that neither Grizzlies nor Grey Wolves are allowed to expand into other areas of my Wyoming without becoming a target for a rifle. The southern Wind River Mountains and Wyoming-Salt River Range deserve bears. A case could be made for the Pryor Mountains on the Montana-Wyoming border and the northern end of the adjacent Big Horn Mountains as new grizzly range. The Crow Tribe has said as much. You should listen to the Tribes on the topic of grizzlies. Frankly , if a Giant Panda bear can be relocated from the bamboo jungles of south China to the National Zoo in Washington D.C. it should be doable to move a grizzly from the North Fork of the Shoshone River at Yellowstone's east gate to the Selway-Bitterroot , a distance of 250 miles by helicopter. In both directions. That the USFWS has not instigated Grizzly Repopulation across the northern Rockies, and the State of Wyoming wants to keep X-numbers of bears inside a Zoo Zone, and not even count any bears outside that Zoo Zone as a component of bear recovery , is a terrible deceit. This one aspect ---lack of landscape expansion opportunities for the Yellowstone bear and lack of genetic connectivity with other bear populations in the Northern Rockies --- is enough to declare Delisting to be null and void. They Yellowstone Grizzly has been branded a Distinct Population Segment strictly for political reasons, and expediency. I reject that. The agency should instead look at the Yellowstone bear both as a sustainable population AND a seed population. Yet Wyoming wants to cull bear numbers to keep them in a Goldilocks gated community of not more than 700 nor less than 500 bears, and that culling will be done by hunting and other human caused mortality , i e. " management actions". Why not relocate ' surplus' bears instead , or if a problem bear raiding the tack shed or apple orchard, put them on unsupervised probation in another state with their electronic GPS necklaces ? Wyoming Game and Fish bear managers have been playing " Musical Bears" for a couple decades now , trapping bears and hauling them to some other release point over the mountain . Sometimes the same bears. Recidivist grizzlies. We have maybe six drop points in all of Wyoming. If we were doing it right, the management agency would relocate bears to 60 drop points across five states. Again , in both directions. Please do allocate the funds to buy a LOT of GPS radio collars. I am not at all opposed to trophy hunting of Grizzlies in Wyoming. I can support that . But only if the agencies agree that expanding and sustaining a growing bear population outside the proposed Grizzly DMA occurs first. We all know that in Wyoming, Grizzly	FWS-R6-ES-2016-0042-	

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healthy bear population in the far future. Neither Fish & Wildlife nor Wyo Game and Fish have produced a plan to guarantee the Yellowstone Grizzly's sustainability based on the needs of the bears. All plans put forth are People Plans, not Bear Plans. Best Available Politics, not science, not genuine wildlife conservation.	Factor D	Delisting is a euphemism for Hunting. Fine. So long as all the tools in the management toolbox , not just the .30-06 rifle with 3x-9x scope , are employed across the Big Picture Landscape of Idaho-Montana-Wyoming-Colorado-Utah - and ??? Grizzly Bears are worth far more alive than dead. The proposed delisting plans (state and federal) seem to emphasize more Dead than Alive when it comes to hands-on bear management. It is regrettable the attitude behind that is so baked in to existent wildlife technocrats and bureaucrats, and narrowminded stakeholders. It is almost as bad as the notion that bear biologists and bear managers actually believe they know bears. They...do...not. USFWS and the IGBST cannot justify delisting the Grizzly by saying it has recovered enough to survive the challenges it faces. We all agree there are a good number of bears...600...700...maybe more , maybe less. The problem is the bear's best food supplies in the core area of Yellowstone Park have collapsed...Cutthroat trout and Whitebark pine seeds. The gross supply of ungulate meat is in shorter supply inside Yellowstone as elk numbers decline. Outside the Park in the Absaroka Range alpine scree slopes the Army Cutworm moth larva are diminishing rapidly due to threats from pesticides and the GMO crop cycle in the lowlands and agribusiness areas of the Midwest . Yellowstone grizzly are becoming Absaroka grizzly and preying on more elk calves, and more livestock. Because of all this, the bears are spreading out , and actual bear density is decreasing over units of public lands. What seems like more bears out on the fringe of the GYE and the proposed DMA are bears that are searching further and wider for food sources. Bears have been spreading out since the early 2000's , and the population number probably peaked in about 2006 . The notion advanced by the IGBST that grizzly's " Omnviory " , the ability to eat a wide variety of vegetation in lieu of less animal protein , is a deception. Grizzlies want meat. Plants are a supplement but not a substitute in the bear's preferred diet. Would you as a human omnivore enjoy being forced to eat mostly salads and give up beef, chicken , pork , fish --- your meats ? Having to work harder and further afield for food is a big challenge to grizzlies, but the real drawdown of bears has been human caused mortalities. We've been killing 50 bears a year for some time...an alarmingly high percentage. The Whitebark pine seed crop has been thin ...not for lack of trees , but because of climate changes and the alien exotic blister rust. BEars simply cannot find the quantity of pine nuts they were having 15 years ago, and the situation is getting worse. When all the factors concerning the bear's food supplies start compounding and cascading, the result is bears coming into conflict zones with humans and their guns. The population dynamic of the Yellowstone Grizzly is at a tipping point, just at the time the humans want to ratchet up all the negative mortality factors affecting bears. The Delisting proposals are designed to do one thing well: reduce bear numbers. And that's about all it does. The IGBST has deluded itself into thinking they have succeeded in recovering bears strictly by the numbers , when in fact the bears are in more danger now than they have been at any time since they were listed back in 1975. It's been a mark of shame that the raw data gathered by the IGBST and their tight circle of researchers has not been fully disseminated to qualified third parties for peer review and analysis. The so-called " Best Available Science" produced by Chris Servheen et al and the IGBST has been built to a conclusion with data massaged and computer models tweaked until it all fits the preconceived political outcome of fabricating bear numbers and management scenarios that appear to show a recovered, feisty, expanding bear population. It all borders on fraud. Besides, it's not about bear numbers , it's about bear habitat. And that is the other Achilles Heel of the proposed grizzly delisting proposal and State plans. There is no provision for sustaining critical grizzly bear habitat requirements. Nothing in the proposals will implore the Forest Service, the BLM , or States to manage for bear habitat. Those agencies will automatically without remorse defer their decisions on behalf of special interests and human stakeholders perceptions. The Grizzly can look forward to more habitat fragmentation and decline of lifestyle should delisting proceed as planned. Forty years ago when the bear was listed under the ESA, you would not have been able to find ten scientists anywhere in the USA who would tell us that Global Climate Change would be a serious challenge in decades to come. Fast forward to today , and we cannot find ten scientists who disagree that Global Climate Change is not a force majeure to be reckoned with ...in every location on the planet from below sea level to the crest of the Himalayas, on all continents. The Yellowstone Grizzly is already adversely affected by climate change , and it's not going to get better in the lifetimes of anyone reading this. Which is why strong habitat protections and enforced regulations of landscape scale issues are paramount. Too bad none of that is in the delisting proposal . The Yellowstone Grizzly's survival into the next century depends on us making the right decisions today . The Great Bear must be allowed to disperse into several surrounding states from the Yellowstone core. That dispersion must be both natural , without undue impediments. And where and when necessary we humans must relocate some numbers and demographics of bears further afield and return virile bears to the core to replenish the gene pool. I see little to nothing in the US Fish and Wildlife's intentions or the state of Wyoming's draft grizzly management plan that would guarantee the survival and virility of the Grizzly Bear in the face of the challenges it faces. I see a People Plan and a whole lotta delusional science, and some deleterious agendas at work disguised as " management". What I do not see is a genuine Grizzly bear Recovery Plan going forward that is actually based on bears, as one would think it should be. Therefore, management cannot be turned over to the States, and Fish and Wildlife as stewards of Endangered Species must retool their thinking a produce a Grizzly bear sustainability plan that puts the bears themselves at the top of the priorities. I reject the proposed Grizzly bear Delisting for all these reasons stated here, and more. Sincerely ; Dewey Vanderhoff Cody Wyoming - submitted electronically May 10 , 2016	5487-A1.rtf	

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I am also concerned that the genetic diversity will be limited if bears are hunted.	Factor E	. Â· ex, Public Comments Processing Attn: Docket No. FWS-R6â€”ES-2015-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. 'Tlâ€™~I@2â€™™E: [5 /\â€™~BsÂ¤i.uÂ·CQ_;Z Nm Âšîâ€™~Z.."LL;j] . jg] ggg 'P><Â¢2S1' <bl:â€™~Tl:\<E- Ecogsg AN; clout; esswÃ©gg jggit E:] @" Lt. S. ;;;,tts>t_Â¢F.Â¢; f[(Â£â€™~i-.. f` f@ 'B=-=Â·=â€™”=â€™” Â©Â·@iz. gl \$571 I~Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. }â€™™Â¢EPÂ¢SÂ£,Qgiu 'I D E.-- br.l' [Z 4;-[5 glu ZLLV gÃ©glg vu ng [Hi guicrnyn} gwrluguygi my mg M0 6 Z; g gy we cr. CONrJÂ£.cTc,0 Â¤lr ,l;{&\$;}1l;[EM [C gow gig J5 egg/cg;) , Ai-Jâ€™~O A; ?0@vcNrzvM <rF gÃ©ggf gggc/=t> gf ALwvJEO IQ ru gz 5-scw/lj â€™” E rrrgggqq ;. 5 r,gg,J Hm L c U; Yifi Q ([546 g Q . gcgcicca ll QE BRC-NAA/Â· Nâ·,-7~Public Comments Processing Attn: Docket No. FWS-R6-ESâ€™”2016-0042 U.S. Fish and Wildlife Service VIS:BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. .._j l 74/ /114 4IAI AÃ©Â·Â© Ka, wz. @23- we /44224 x4â€™™ T1; ..1 1. ul, Â·Â· /&Z6Dq zu .4 11 JL.;} A1 Â·Â·Â· Â· AJ r . # i d'/4 7 Â¢ , _ 1 / / Â·Â·â€™™ Â·- I . {J Q,. AQAM.4 _Â·» rz, ro i,l v JMX . â€™™ â€™” ;. new ,.. r' .4*;;. (H A _ M l if In;Â·» â€™™ â€™” Â·@ mz /O l Â¤/me H,/1... F A./n. Al _ 1 â€™¢,Â·» ,. zi ,Â·» mi;; _ ' . rd;? _ Â·» Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I " â€™” r r 1 l â€™” *4*%/ 14 llÂ· A Â· 5 ' l . , â€™” Â·» G, r ' ipidrll mobil E r' â€™” . A l lj 'YL V pi zazzF, "" JI ...L.'.Â·» :id . Lia @% __ rw/lll' *1 / P lÃ© gtzÃ©gztl~lÂ·` iâ€™œ` â€™” `~â€™”Â· ..â€™~â€™~â€™œ iv Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife SenrlceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I lgfm gm {he viog /\L Â¤L www Aer 0 t/kskg 5 ok @ ul/All Eg Â· --`[ Avi/\ Qkggg gm; Qwvxeg ln a OI `kfk â€™” LAAAQY -= AA \\A(Â·;* â€™¢ â€™™ ' A V\ Q~` Q' Q .i.31,_T Publlic Comments Processing Attn: Docket No. FWSâ€™”R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. ggnii-L\r' l Â· _ Â· Â· J â€™¢â€™”l V l l i Public Comments Processing Q) Attn: Docket No. FWS-R6-ES-2016-0042 *lâ·,-'H' Bâ€™™BlO9.Y` U.S. Fish and Wildlife Service . szvs Leesburg Pike Gp ze mw. M T" Falls Church, VA 22041-3803 ( C; â€™~i 7 l S` _ iq Please accept my following comments on Fish and Wildlife Serviceâ€™s proposal to remove Endangered qcb _ . Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. lab? kv BB? glg? cov ygiew `Fâ€™™ 15 QE dlweoc Qvizzlrf lOQ.:c;/ g remgv-ed EgÃ©kgiig gg Sqdgg Ad". {Lrg; ggalwvcn ag still urccl -â€™”- vwgxe. Sjyglhfh igâ€™œJ wevvc xi lg Q; ..~\0v~Q :v~Â·\l.P<.Jvâ€™™\`2r/xlj apt/{ om);. jg â€™”B\\<JÂ¤=->%v h lmhifaljhi kaeav ygcwg ew [-eg @PE\glvÂ¤Â¤A Â· Pkifgg mgcwgrdcmyg â€™”zÂ·Â·~.dL 2-No Lo uglggitq gm c.Â¤ 0 vypm~` _ s -â€™” . 3% Public Comments Processing Attn: Docket No. FWS-R6â€™”E5-2016-0042 U.S. Fish and Wildlife SenriceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. â€™” 5 , 1 , l , â€™¢ ` Â· gÂ·».._n :.1...- 1 a V5l â€™¢. Kl O Â· E, .Â· nv â€™” 0 & AAA O1 Â· â€™” â€™” ' lazaxs La 4; .1 .. qquue-. 1 L.: &6Â¤4Y`vuL,â€™”iÂ¤`Ejofi	FWS-R6-ES-2016-0042-5663-A1.pdf	

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Population explosion in the areas around Yellowstone and Glacier and the still unknown dislocation that will follow global warming make the bear recovery tentative.	Factor E	. Â· ex, Public Comments Processing Attn: Docket No. FWS-R6â€™ES-2015-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. 'Tlâ€™~I@2â€™™E: [5 /\â€™~BsÂ¤i.uÂ·CQ_;Z Nm Âšîâ€™~Z.."LL;j] . jg] ggg 'P><Â¢2S1' <bl:â€™~Tl:\<E- Ecogsg AN; clout; esswÃ©gg jggit E:] @" Lt. S. ;;;,tts>t_Â¢F.Â¢; f[(Â£â€™~i-.. f` f@ 'B=-=Â·=â€™=â€™” Â©Â·@iz. gl \$71 I~Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. }â€™™Â¢EPÂ¢SÂ£,Qgiu 'I D E.-- br.l' [Z 4;-[5 glu ZLLV gÃ©glg vu ng [Hi guicrnyn} gwrluguygi my mg M0 6 Z; g gy we cr. CONrJÂ£.cTc,0 Â¤lr ,l;{&\$;}1l;[EM [C gow gig J5 egg/cg;) , Ai-Jâ€™~O A; ?0@vcNrzvM <rF gÃ©ggf gggc/=t> gf ALwvJE0 IQ ru gz 5-scw/lj â€™” E rrrgggqq ;. 5 r,gg,J Hm L c U; Yifi Q ([546 g Q . gcgcicca ll QE BRC-NAA/Â· Nâ·,-7~Public Comments Processing Attn: Docket No. FWS-R6-ESâ€™2016-0042 U.S. Fish and Wildlife Service VIS:BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. .._j l 74/ /114 4IAI AÃ©Ã© Ka, wz. @23- we /44224 x4â€™™ T1; ..1 1. ul, Â·Â· /&Z6Dq zu .4 11 JL.;} A1 Â·Â·Â· AJ r . # i d'/4 7 Â¢ , _ 1 / / Â·Â·â€™™ Â·- I . {J Q,. AQAM.4 _Â·» rz, ro i,l v JMX . â€™™ â€™” ;. new ,.. r' .4*;;. (H A _ M l if ln;Â·» â€™™ â€™” Â·© mz /O l Â¤/me H,/1... F A./n. Al _ 1 â€™¢,Â·» ,. zi ,Â·» mi;; _ ' . rd;? _ Â·» Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I " â€™ r r 1 l â€™” *4*%/ 14 llÂ· A Â· 5 ' l . , â€™” Â·» G, r ' ipidrll mobil E r' â€™” . A l lj 'YL V pi zazzF, "" JI ...L.'.Â·» :id . Lia @% __ rw/lll' *1 / P lÃ© gtzÃ©gztl~lÂ·` iâ€™œ` â€™” `~â€™”Â· ..â€™~â€™~â€™œ iv Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife SenrlceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I lgfm gm {he viog /\L Â¤L www Aer 0 t/kskg 5 ok @ ul/All Eg Â· --`[ Avi/\ Qkgg gm; Qwvxeg ln a Ol `kfk â€™” LAAAQY -= AA \\A(Â·;* â€™¢ â€™™ ' A V\ Q~` Q' Q .i.31,_T Publlic Comments Processing Attn: Docket No. FWSâ€™R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. ggnii-L\r' l Â· _ Â· Â· J â€™¢â€™”l V l l i Public Comments Processing Q) Attn: Docket No. FWS-R6-ES-2016-0042 *lâ·,-'H' Bâ€™™BlO9.Y` U.S. Fish and Wildlife Service . szvs Leesburg Pike Gp ze mw. M T" Falls Church, VA 22041-3803 ( C; â€™~i 7 l S` _ iq Please accept my following comments on Fish and Wildlife Serviceâ€™s proposal to remove Endangered qcb _ . Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. lab? kv BB? glg? cov ygiew `Fâ€™™ 15 QE dlweoc Qvizzlrf lOQ.:c;/ g remgv-ed EgÃ©kgiig gg Sqdgg Ad". {Lrg; ggalwvcm ag still urccl -â€™”- vwgxe. Sjyglhfh igâ€™œJ wevvc xi lg Q; ..~\0v~Q :v~Â·\l.P<.Jvâ€™™\`2r/xlj apt/{ om});. jg â€™”B\\<JÂ¤=->%v h lmhifaljhi kaeav ygcwg ew [-eg @PE\glvÂ¤Â¤A Â· Pkifgg mgcwgrdcmyg â€™”zÂ·Â·~.dL 2-No Lo uglggitq gm c.Â¤ 0 vypm~~ _ s -â€™” . 3% Public Comments Processing Attn: Docket No. FWS-R6â€™E5-2016-0042 U.S. Fish and Wildlife SenriceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. â€™” 5 , 1 , l , â€™¢ `Â· gÂ·».._n :.1...- 1 a V5l â€™¢. Kl O Â· E, .Â· nv â€™” 0 & AAA O1 Â· â€™” â€™” ' lazaxs La 4; .1 .. qquue-. 1 L.: &6Â¤4Y`vuL,â€™”iÂ¤`Ejofi	FWS-R6-ES-2016-0042-5663-A1.pdf	

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Indeed, climate change has already wiped out two key food sources for Yellowstone ecosystem grizzliesand it is readily apparent that things will only get worse - for the grizzlies, for all of us.	Factor E	I write in light of this week’s court decision overruling the USFWS refusal to consider climate change with respect to wolverines. The USFWS is making the same argument with respect to Yellowstone area gtizzly bears that It did for wolverines. Indeed, USFWS stated: "we conclude that the effects of climate change do not constitute a threat to the [Yellowstone grizzly bear population] now, nor are they anticipated to in the future." It makes no sense to say that climate change will not impact grizzlies –just as it made no sense with the wolverines. Indeed, climate change has already wiped out two key food sources for Yellowstone ecosystem grizzlies and it is readily apparent that things will only get worse - for the grizzlies, for all of us. Please, take heed of the federal court’s admonishment and instruct USFWS to consider climate change in its plan to delist Yellowstone area grizzly bears.	FWS-R6-ES-2016-0042-5664-A2.pdf	
Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest.	Factor E	On March 11, 2016 the US Fish and Wildlife released a proposed rule in the Federal Fiegister (vol. 81, No. 48, pp. 13174 - 13227) for, Fiemoving the Greater Yellowstone Ecosystem Population of Grizzly Bears From the Federal List of Endangered and Threatened Wildlife; Proposed Fiule. Herein referred to as The Fiule. Dr. Christopher Servheen, Grizzly Bear Fiecovery Coordinator, U.S. Fish and Wildlife Service is lead author and primary contact for The Fiule. My name is Kathryn Iverson, resident of Edina, MN. My husband and I own property bordering the Northeast entrance to Yellowstone National Park. We fish, hike and camp in the Greater Yellowstone ecosystem. We have observed significant changes in this area, including huge die- offs of pines, (you can see the brown trees stretching across mountainsides, seeing evidence of warming waters in trout streams and lakes (algae blooms where none ever existed), as well as personally fishing at Yellowstone Lake with my grandsons, where we saw the tonnage of lake trout that are infiltrating Yellowstone Lake, and outcompeting the native cutthroat trout. Knowing that the grizzly bear is dependent on these ecosystems for survival, I urge the U.S. Fish & Wildlife Grizzly Bear Coordinator to share me deep concerns about delisting the Grizzly Bear from the Greater Yellowstone Ecosystem population. Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Fiule cavalierly dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. Carrying capacity The Fiule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Fiule). An alternative hypothesis that is not considered in The Fiule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement	FWS-R6-ES-2016-0042-	

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Climate Change Impacts The impact of climate change on Yellowstone's grizzlies is summarily dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The	Factor F	On I\larch 11. 2016 the US Fish and Wildlife released a proposed rule in the Federal Fiegister (vol. 81, No. 48, pp. 13174 - 13227) for, Fiemoving the Greater Yellowstone Ecosystem Population of Grizzly Bears From the Federal List of Endangered and Threatened Wildlife; Proposed Fiule. Herein referred to as The Fiule. Dr. Christopher Servheen, Grizzly Bear Fiecovery Coordinator, U.S. Fish and Wildlife Service is lead author and primary contact for The Fiule.I\ly name is Kathryn Iverson, resident of Edina, I\IN. I\ly husband and I own property bordering the Northeast entrance to Yellowstone National Park. We fish, hike and camp in the Greater Yellowstone ecosystem. We have observed significant changes in this area, including huge die- offs of pines, (you can see the brown trees stretching across mountainsides, seeing evidence of warming waters in trout streams and lakes (algae blooms where none ever existed), as well as personally fishing at Yellowstone Lake with my grandsons, where we saw the tonnage of lake trout that are infiltrating Yellowstone Lake, and outcompeting the native cutthroat trout. Knowing that the grizzly bear is dependent on these ecosystems for survival, I urge the U.S. Fish & Wildlife Grizzly Bear Coordinator to share me deep concerns about delisting the Grizzly Bear from the Greater Yellowstone Ecosystem population. Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high- elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Fiule cavalierly dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has. Carrying capacity The Fiule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Fiule). An alternative hypothesis that is not considered in The Fiule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement	FWS-R6-ES-2016-0042-	

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an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the blithe statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence.	Factor L	for "best science" as required by law.Excessive, Unsustainable Mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection of the Threatened and Endangered Species act. Removing T&E protection and placing it inthe hands of the three states of Idaho, I\lontana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Genetic Viability The Greater Yellowstone grizzly population is isolated from all other grizzly populations (pp. 13190- 13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly population is seriously flawed and violates the requisite principle of "Best Science.â€™ Climate Change Impacts The impact of climate change on Yellowstone's grizzlies is summarily dismissed in The Rule (p. 13197, p. 13200), by the statement, "I\lost grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the blithe statement that, 'grizzly bears are adaptable, they' do just fine,' with little or no supporting evidence. Population Estimates Accurately estimating the number of bears in a large, rugged area like the Greater Yellowstone Ecosystem is a difficult task, yet such an estimate is essential for any post-delisting decisions regarding sport hunting of grizzlies by the states. The methods used by the IGBST to estimate bear population numbers has been seriously questioned in the peer-review, scientific literature. This inadequacy has not been resolved by subsequent IGBST rebuttal. All data regarding grizzly numbers needs to be made available for independent scientific analysis and review. Scientific Accountability The IGBST has been less than transparent about making taxpayer funded data (which they have maintained an exclusive monopoly) available for scrutiny by the larger scientific community. All raw data on grizzly bears collected by government agencies should be made available to independent scientists. In view of the wide disagreement about delisting decisions, the USFWS should establish a review panel of independent, academically qualified scientists who are not involved in current grizzly bear research in the GYE.~	5047-A1.pdf	
		YP'ziÃ©science for a changing world Fomxcmc Bumvion or Noam AMuucAu Bums David J. Mattson P.O. Box 5614, BLD 24 Southwest Biological Science Center Flagstaff, AZ 86011-5614 Colorado Plateau Research Station Phone: 928-556-7466 x 245 Northern Arizona University Email: David Mattson@usgs.gov Predation on Land-Dwelling Prey Even though all three North American bear species can be predators, the grizzly bear is more likely to kill larger terrestrial prey; either because of opportunity (compared to polar bears) or aptitude (compared to black bears). An adult grizzly is large enough to kill most adult ungulates, and equipped with claws, teeth, and power sufficient to deliver a killing blow. I\leat's ready digestibility also means that the typical bear will reap considerable rewards from predation. Bears locate larger land-dwelling prey, such as deer, elk, and moose, by a variety of methods and with varied intent. A certain number of encounters with potential prey are strictly by chance, apparently without deliberate stalk or search. This is typified by one incident where two grizzlies approached some elk behind a blind rise, without either species being aware of the other's presence. However, as soon as the elk came into sight, one of the bears lunged after them, but without success. This unfruitful result probably characterizes the vast majority of these chance encounters, however there are enough recorded kills in rolling terrain or otherwise visually opaque conditions to suggest occasional success under similar circumstances. On the other hand, the majority of observations suggest that both black and grizzly bears most often encounter their prey either after a deliberate search, characterized by movement in the direction of the hoped-for kill, or, with even greater forethought, by putting themselves in areas with concentrations of vulnerable prey. Elk and caribou calving grounds or traditional caribou river crossings are good examples of such areas where, either because of extreme young age, the preoccupations of birth, or the mass confusion of swimming animals, otherwise elusive ungulates become easy prey. This is most dramatically borne out by several graphic descriptions of observers such as Adolf I\lurie, Harry Reynolds, Kerry Gunther, and Steve and I\larilyn French, of contemporaneous pursuits, kills, and confrontations by grizzlies concentrated on calving grounds in Alaska and Wyoming. Bears clearly use all of their senses		

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USFWS states climate change is not a threat to the bears, and will not be in the future, but has shown no scientific data to back this up. The bears' food sources are in decline: the whitebark pine due to pine beetle infestation caused by climate change, the cutworm moth, and the cutthroat trout under threat from the lake trout. USFWS argues there are alternate sources of food available to the bears, but has not shown scientific data that would establish those purported alternative sources of food have the necessary nutrition to meet the bears' dietary needs. The assertion is not supported by scientific evidence.	Factor E	to track down prey. However, most observations suggest a prominent role for olfactory and audio cues. Bears have often been observed following scent trails associated with potential prey, sometimes for miles, or more convincingly, been seen killing calves at the culmination of a complex search mostly with nose to the ground. There are other phenomena that argue anecdotally for the prominence of hearing in tracking down meat. A number of hunters bugling for elk have surprised themselves by soliciting the apparently predatory interest of a grizzly bear. Concordantly, there is a consistently observed tendency world-wide for increased bear predation on both bull elk and bull moose during their fall ruts. Bears also seem to be attracted to the sound of gun-fire during the hunting season, one can only suppose with the intent of scavenging the gut pile and other remains of a hunter's kill. Although this likely orientation towards sound has not been conclusively demonstrated, it remains an intriguing possibility worthy of further study. Bears can chase down prey in open country, and are more successful at this tactic after separating a young calf from a cow-calf herd. Capture usually occurs after the pursuing bear cuts the corner on a fleeing calf that has been foolish enough to turn. However, most successful bear predations are not the result of long pursuits, but rather the result of a short-range rush either from ambush or after a stalk. Given the relative slowness of bears, at least compared to most wild ungulates, there is a distanceForaging Behavior ofBears . Mattson 2 at which this rush is more likely to be successful or, if not, then terminated. A number of records by different observers in different areas suggest that this "optimal" distance is around 20-50 m. Without the aid of mitigating conditions or tactics, it would be difficult for a bear to get this close to a reasonably alert and healthy ungulate, and so it should be no surprise that most kills are associated either with cover, conditions that hinder prey mobility, or the afflictions of exhaustion, disease, or raging sexual hormones in their prey. Thus, many documented predations have been in or near the edge of willow thickets and dense timber, often near running water; presumably under conditions that facilitate the unobserved approach of a predatory bear. Other predations occur on forest game trails, often as the prey negotiates deadfall or a small draw; under conditions where temporary imbalance or distraction would favor a successful ambush. Otherwise, bear researchers throughout the northern hemisphere have noted the remarkable success of bears preying upon winter-weakened ungulates in spring snow conditions. Surface crusts form that can support the weight of a broad-footed bear but not a larger-bodied ungulate such as an elk, moose, or muskox. Under these conditions the delivery of a killing bite is more often a constraint than over-taking the prey. Similarly, exhausted and/or hormonally-deluded bulls seem to make relatively easy bear prey during and after the fall ruts. One extraordinary story from Siberia recounts a brown bear that lured a rutting bull moose into a willow thicket by imitating the bull's mating roar. Grizzly bears kill land-dwelling prey primarily one of two ways. I\lost often they maneuver to approach over the back, after which they grab the animal around the rib-cage and, if successful, deliver a killing bite to the back of the neck or skull. A bite to the small of the back may be a prelude to this finishing move, or an animal that escapes the first attempted neck bite may be severely wounded on the flanks by the bear's claws as they are disengaged from their hold. An approach from the rear is also the logical consequence of a chase, and on occasion the bear may use its weight to collapse the hind- quarters of an animal that has just been caught. The next most common kill technique involves a bite to the nose and face that at least paralyzes and possibly kills the animal. Either way, the animal does not offer subsequent resistance. Interestingly, there are only a few reports of bears delivering killing or debilitating blows with their paws, and in most cases their paws come into play for such things as pinning down a newly-captured calf or grasping larger prey to facilitate delivery of a killing bite. Bears are able to consume between 12 and 40 kg of fresh meat in a day. However, consumption is not indiscriminate and typically reflects marked preference for some carcass parts. Almost universally, the most favored or at least first eaten portion of a female is the udder. After that, most bears eat the brisket and adjacent rib meat or the meaty proximal part of the front legs. I\lost carcasses are cleanly eviscerated soon after they are killed or found by a bear, with the heart, liver, and lungs selected for priority consumption. The skin, hair, rumen, and stomach are the most consistently unused soft parts of a carcass. In fact, a more-or-less neatly peeled off hide is one of the more diagnostic signatures of bear involvement. Bears are also one of the few consumers that can readily crack the major leg bones of a larger ungulate in pursuit of the marrow. Some bears even get into the habit of cracking the skull so that they can consume the brains. There are other features that distinguish carcass use by grizzly bears. If there are enough edibles to warrant the investment, a bear will typically bury the entire carcass or selected parts of it by scraping adjacent soil and litter over the tidbit with its front paws. Presumably this inhibits decomposition and the dissemination of scent that might attract competitors. As further sign of ownership, you might even find a bear sprawled directly on top of a carcass, attempting to rest while at the same time prevent pilfering by other scavengers. A bear may also move an intact or even partly consumed carcass to a spot more to its liking. If the carcass is not fresh, a drag trail of shed ungulate hair will connect the new carcass location with the rumen contents left at the original site of death. In addition, there are often bear beds nearby and a bear trail leading to the nearest available water (an apparent necessity when consuming such a protein-rich diet). As a final note on this type of predation - grizzlies exhibit marked preference for different sizes and species of ungulates. They are least likely to attack very large herd-dwelling animals that rely upon aggression for predator defense, epitomized by bison. Among the larger ungulates, they seem most likely to attack moose, presumably because of a solitary forest-dwelling existence that lends itself to ambush. However, within any given medium- to large-bodied prey species, bears preferentially prey upon young animals, especially the highly vulnerable neonates. On the other hand, although they are not	FWS-R6-ES-2016-0042-0513-A3.pdf	

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There is no evidence the current population in Greater Yellowstone can provide genetic diversity to support the species. Yellowstone bears have not connected with Northern Continental Divide bears. The groups need to reach each other for genetic diversity. If hunters kill grizzly bears then it will be even less likely that the groups meet	Factor E	YP'ziÃ©science for a changing world Fomxcmc Bumvion or Noam AMuucAu Bums David J. Mattson P.O. Box 5614, BLD 24 Southwest Biological Science Center Flagstaff, AZ 86011-5614 Colorado Plateau Research Station Phone: 928-556-7466 x 245 Northern Arizona University Email: David Mattson@usgs.gov Predation on Land-Dwelling Prey Even though all three North American bear species can be predators, the grizzly bear is more likely to kill larger terrestrial prey; either because of opportunity (compared to polar bears) or aptitude (compared to black bears). An adult grizzly is large enough to kill most adult ungulates, and equipped with claws, teeth, and power sufficient to deliver a killing blow. I\ eat's ready digestibility also means that the typical bear will reap considerable rewards from predation. Bears locate larger land-dwelling prey, such as deer, elk, and moose, by a variety of methods and with varied intent. A certain number of encounters with potential prey are strictly by chance, apparently without deliberate stalk or search. This is typified by one incident where two grizzlies approached some elk behind a blind rise, without either species being aware of the other's presence. However, as soon as the elk came into sight, one of the bears lunged after them, but without success. This unfruitful result probably characterizes the vast majority of these chance encounters, however there are enough recorded kills in rolling terrain or otherwise visually opaque conditions to suggest occasional success under similar circumstances. 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However, most observations suggest a prominent role for olfactory and audio cues. Bears have often been observed following scent trails associated with potential prey, sometimes for miles, or more convincingly, been seen killing calves at the culmination of a complex search mostly with nose to the ground. There are other phenomena that argue anecdotally for the prominence of hearing in tracking down meat. A number of hunters bugling for elk have surprised themselves by soliciting the apparently predatory interest of a grizzly bear. Concordantly, there is a consistently observed tendency world-wide for increased bear predation on both bull elk and bull moose during their fall ruts. Bears also seem to be attracted to the sound of gun-fire during the hunting season, one can only suppose with the intent of scavenging the gut pile and other remains of a hunter's kill. 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As stated in the proposed rule, out of the four common grizzly bear foods in the GYE, "only whitebark pine seeds are known to have an influence on grizzly bear mortality risk and reproduction." Due to their high fat content, whitebark pine seeds can be an important food source for bears in the GYE when they are available. Whitebark pine seed availability can influence the reproductive and survival rates as well as the movements of these grizzly bears. During years of low pine seed availability, bears foraging at lower elevations may be	Factor F	We appreciate the opportunity to provide comments regarding the removal of the Greater Yellowstone Ecosystem (GYE) population of grizzly bears from the federal list of endangered and threatened wildlife. American Forestsâ€™ mission is to restore threatened forest ecosystems and inspire people to value and protect our urban and wildland forests. As a primarily forested ecosystem, American Forests has a direct interest in the GYE and the status of its population of grizzly bears. Whitebark pine provides an important food source for grizzly bears. We have planted hundreds of thousands of disease resistant whitebark pines throughout its range, focused primarily in the GYE. We caution the U.S. Fish and Wildlife Service (USFWS) from removing grizzly bears from the list of endangered and threatened wildlife, as this forest type and important source of food is still recovering from the recent mountain pine beetle infestation. As stated in the proposed rule, out of the four common grizzly bear foods in the GYE, "only whitebark pine seeds are known to have an influence on grizzly bear mortality risk and reproduction." Due to their high fat content, whitebark pine seeds can be an important food source for bears in the GYE when they are available. Whitebark pine seed availability can influence the reproductive and survival rates as well as the movements of these grizzly bears. During years of low pine seed availability, bears foraging at lower elevations may be more likely to encounter humans which can also contribute to an increased potential for human-caused mortality. The whitebark pine is currently warranted for protected status under the Endangered Species Act but that action is precluded by higher priority actions. This interconnection between grizzly bears and whitebark pine is recognized in the scientific literature, primarily prior to the rapid decline of whitebark pine in the GYE due to the mountain pine beetle infestation. We are pleased the USFWS is addressing the Ninth Circuitâ€™s concerns regarding the evaluation of whitebark pine in the 2007 attempt to delist the GYE grizzly bears (Greater Yellowstone Coalition v. Servheen, et. al., 665 F.3d 105 (9th Cir. 2011)). American Forests appreciates the analysis of existing research regarding the recent decline of whitebark pine and the grizzly bear dependence on its seeds as a main source of food. However, we believe the impacts of the decline have not been fully understood because the recent	FWS-R6-ES-2016-0042-	

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more likelyto encounter humans which can also contribute to an increased potential for human-caused mortality. The whitebark pine is currently warranted for protected status under the EndangeredSpecies Act but that action is precluded by higher priority actions. This interconnection between grizzly bears and whitebark pine is recognized in the scientific literature, primarily prior to therapid decline of whitebark pine in the GYE due to the mountain pine beetle infestation.	Factor E	infestation of mountain pine beetles has only recently subsided. While the studies conducted during this time show the grizzly bears turning to other food sources, resulting in little changes to their body mass or in the population growth rate, the sample sizes for these studies were small. The "Response of Yellowstone grizzly bears to changes in food resources; a synthesis" that the USFWS relies heavily upon for its1analysis cautions that more data is needed before it could be determined if there was truly a trend in the body condition of the grizzly bears. This further emphasizes that studies may not be conclusive and additional time is necessary to understand the impact of whitebark decline On the grizzly population. The USFWS carefully manages human-caused mortality based on scientific monitoring of the population. It is well documented that in years of low whitebark pine seed availability, grizzly bear-human interactions increase resulting in the mortality of grizzly bears. Again, the USFWS relies on a study from 2000-2012 to determine that the effect of low whitebark pine seeds and human caused mortality is negligible to grizzly bear population growth. However, the most extreme loss of whitebark pine occurred from 2009 through 2015. American Forests cautions the USFWS to conclude that the loss of whitebark pine is not felt by the grizzly bears. As a key food source for grizzly bears in the GYE, we believe the full impact of the decline in whitebark pines has not been adequately studied since the infestation of mountain pine beetles is only now waning. American Forests agrees that, eventually, grizzly bears in the GYE could be removed and touted as a success of the Endangered Species Act. However, that time is not now as the whitebark pine seeds continue to play a large role in grizzly bear recovery. While great effort has occurred to restore whitebark pine to the GYE, much more is needed. American Forests will continue to play our role in restoring the whitebark pine to the GYE. We look forward to working with the USFWS, US Forest Service, State natural resource agencies and others to implement a more comprehensive restoration strategy for the whitebark pine ecosystem which can complement long term management of grizzly bears in the GYE and other parts of their range.	5157-A1.pdf	
We are pleased the USFWS is addressing the Ninth Circuit’s concerns regarding the evaluationof whitebark pine in the 2007 attempt to delist the GYE grizzly bears (Greater Yellowstone Coalition v. Servheen, et. al., 665 F.3d 105 (9th Cir. 2011)). American Forests appreciates theanalysis of existing research regarding the recent decline of whitebark pine and the grizzly bear dependence on its seeds as a main source of food. However, we believe the impacts of thedecline have not been fully understood because the recent infestation of mountain pine beetles has only recently subsided. While the studies conducted during this	Factor E	We appreciate the opportunity to provide comments regarding the removal of the Greater Yellowstone Ecosystem (GYE) population of grizzly bears from the federal list of endangered and threatened wildlife. American Forests’s mission is to restore threatened forest ecosystems and inspire people to value and protect our urban and wildland forests. As a primarily forested ecosystem, American Forests has a direct interest in the GYE and the status of its population of grizzly bears. Whitebark pine provides an important food source for grizzly bears. We have planted hundreds of thousands of disease resistant whitebark pines throughout its range, focused primarily in the GYE. We caution the U.S. Fish and Wildlife Service (USFWS) from removing grizzly bears from the list of endangered and threatened wildlife, as this forest type and important source of food is still recovering from the recent mountain pine beetle infestation. As stated in the proposed rule, out of the four common grizzly bear foods in the GYE, "only whitebark pine seeds are known to have an influence on grizzly bear mortality risk and reproduction." Due to their high fat content, whitebark pine seeds can be an important food source for bears in the GYE when they are available. Whitebark pine seed availability can influence the reproductive and survival rates as well as the movements of these grizzly bears. During years of low pine seed availability, bears foraging at lower elevations may be more likely to encounter humans which can also contribute to an increased potential for human-caused mortality. The whitebark pine is currently warranted for protected status under the Endangered Species Act but that action is precluded by higher priority actions. This interconnection between grizzly bears and whitebark pine is recognized in the scientific literature, primarily prior to the rapid decline of whitebark pine in the GYE due to the mountain pine beetle infestation. We are pleased the USFWS is addressing the Ninth Circuit’s concerns regarding the evaluation of whitebark pine in the 2007 attempt to delist the GYE grizzly bears (Greater Yellowstone Coalition v. Servheen, et. al., 665 F.3d 105 (9th Cir. 2011)). American Forests appreciates the analysis of existing research regarding the recent decline of whitebark pine and the grizzly bear dependence on its seeds as a main source of food. However, we believe the impacts of the decline have not been fully understood because the recent	FWS-R6-ES-2016-0042-	

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This includes trapping, increase in numbers of wolves allowed by one hunter to take, silencers, etc. This is not done with deer and elk. FWP and federal trappers do not go out and slaughter a herd of elk or deer with aircraft because hunting targets were not met, they were a threat to cattle or they were too close to my cows. I fear that Griz will be treated as wolves since 600 bears is our target population to keep the Griz off the ESA and this is our target. We will allow for hunting, bear baiting, etc to keep bear at this population at all costs. Delisting of wolves has not gone so well in Wyoming and the mid-west, at least according to federal judges. Federal funding for Grizzly population surveys will stop after 5 years. Will it then be left up to the states to monitor Grizzly Bear? Is there a funding mandate placed on the states to monitor the Grizzly populations? Economics: There has been new economic information on the value of Grizzly bears for tourism. The study showed that Grizzly bear are an economic driver for tourism. Hunting Griz will hopefully create tourism boycotts. Disease: Due to the small population of grizzly bear, islands of bear habitat and global warming, it is possible that the Yellowstone population could be decimated with a disease that the bear would never recover from. 700 bear are too small of a population for long term survival. How does delisting now respond to issues of disease? Isolated populations: Unfortunately politics punched a hole in the ESA when Senator Testor put a rider on wolf delisting. Up until that point, whole populations needed to be at least stable growing throughout species historic range before delisting could happen. The delisting of pockets of Griz when the bear are not established in their historic range is shortsighted. How are the bear doing in the Cabinet Yaak. How will the bear do around Glacier long term when one looks at human development? What is the acceptable population numbers and habitat that the USFWS has determined for Griz to be delisted in the lower 48 states? Look at all of the human growth in the Madison, Gallatin and Paradise , Boulder and Redlodge Valleys. How does this growth allow for Griz to re-inhabit historic ranges? Food sources: The diet of Griz around Yellowstone NP has changed drastically. The bear have lost whitebark pine, cutthroat trout and moths as a major high nutrient food source. As a result their diet has needed to change. How will delisting these bear now protect future bear generations if they lose other food sources? Is there enough habitat and human tolerance for Griz that will allow for Griz to use new habitat for new food sources? How will delisting effect Griz if the bear take cattle on federal grazing leases? New threats: The new threats come from the same old major threat-humans. Without the ESA protections it will be difficult for policies to be put in place quickly to protect Griz. Look how long it has taken to establish viable Bull trout critical habitat? Habitat loss: Growth around national parks and wilderness areas are the fastest growing areas in the west. People want to live in nice places. Unfortunately griz do not have the latitude or ability to move to many places in the west and survive. They have been pushed in the past to places that people did not want to live. They were plains animals. I have included maps of population growth in the Flathead from 1970-2010 and these maps clearly show habitat loss. If federal lands are transferred to the states as some people want, how will this political action affect the viability of Griz?? Without ESA protections many shortsighted land management decisions will be made that will reduce habitat suitable for Grizzly bear. In the past even in the 1970s when food sources were bad for Grizzly bear, they could go down in the valleys and find food. With the conversion of the valleys to housing and ranching the bear have lost this source of food in times of drought. As global warming continues, where is the habitat set aside by the states to accommodate this top predator? I am amazed at the growth of humans and change of wildlife habitat to human dominated habitat from highway building, human housing development, roads from logging, weeds and the shorter winters in Idaho, Montana and Wyoming since the 1970s. When I project this growth forward, I really do not know where the griz will live in the future. Look at the map of the Flathead in 1970 and then 2010. The growth is impossible to ignore. This growth has happened throughout Griz habitat. The bear was listed in 1975 and look at the loss of habitat and how Montana finally was forced to stop hunting the bear in 1980? Now you want to leave it to the states to manage Grizzly bear? Griz are not deer. Global warming: From 1978- 2000 there were over 30 more frost free days in Montana. It does not get down to -50F anymore. Forest fires and lower and less snow pack will be more common. How does delisting the bear now protect them in the future as their present habitat will be unrecognizable in 20-30 years? Hunting: There is no rational reason the hunt Griz again. I have hunted in the past and do support hunting. But not for Grizzly bear. They reproduce too slowly and there are too many human caused threats present and unforeseen future ones to allow for the states to hunt them. Look at Wyoming's plan to only allow wolves in a small part of the state. Look at Idaho that says they are doing elk studies in the Frank Church River of No Return Wilderness with helicopters and it turns out it was only to hunt wolves? Look at Montana where wolf hunting rules are being relaxed and new manners of killing them is looked at every legislative session? I do not trust these states to wisely manage Griz. Past hunting got the bear listed. While the public in general wants top predators on the landscape, local ranchers and hunters do not like top predators. Ranchers with federal grazing leases hate predators and will shoot more of them without federal protections. What will happen when a hunter wounds a bear and the bear gets pissed and starts killing people? Bear are not deer. There is no reason to hunt bear. It will encourage poaching, allow for ranchers and farmers to shoot bear on sight and unfortunately lead to the bear's eminent demise. Please do the right thing for future generations and stop the delisting of Grizzly bear until there are stable populations in the Frank Church and Selway-Bitterroot Wilderness Areas, the CM Russell, Washington, Idaho, Oregon and California(the bear is on their state flag). As you know top predators improve habitat for all species. Including humans. The piecemeal approach to Griz delisting is short sighted and will fail the species that the ESA was designed to help. Thanks for your time , Stephen Braun PO Box 5614 Whitefish, MT	FWS-R6-ES-2016-0042-5183-A1.docx	

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First, notwithstanding the significant increase in the number of bears living in the GreaterYellowstone Area since 1975, the population remains under significant ecological pressure. While the seeds ofthe whitebark pine tree are a major food source for the grizzly bear, the populations ofthis tree have been decimated in recent decades by a combination of white pine blister rust and mountain pine beetle outbreaks, with white pine mortality exceeding 50% some areas of thenorthwestern United States. It is unclear to what extent the Yellowstone grizzly population has been able to overcome the loss of this important food source.	Factor E	I am writing to ask your agency to withdraw its proposal to remove grizzly bears living in the Greater Yellowstone Area from the List of Endangered and Threatened Wildlife. While it is true that the population of grizzly bears in the Greater Yellowstone Area has increased from 136 bears in 1975 to around 700 bears today, there are several compelling reasons why this proposal should nevertheless be withdrawnn. First, notwithstanding the significant increase in the number of bears living in the Greater Yellowstone Area since 1975, the population remains under significant ecological pressure. While the seeds ofthe whitebark pine tree are a major food source for the grizzly bear, the populations of this tree have been decimated in recent decades by a combination of white pine blister rust and mountain pine beetle outbreaks, with white pine mortality exceeding 50% some areas of the northwestern United States. It is unclear to what extent the Yellowstone grizzly population has been able to overcome the loss of this important food source. Additionally, the hunting of grizzly bears in the Greater Yellowstone Area will have a disproportionate effect on both the size and genetic diversity of the bear population. Here, an important consideration is that grizzly bears are extremely slow to reproduce. Female grizzlies do not begin mating until they are four or five years old, and spend an average of 2.5 years rearing each litter. The killing of healthy, wide-roaming adult bears can he expected to have an outsize effect on the total grizzly population. The grizzly bears of the Greater Yellowstone Area also remain genetically isolated, with the nearest other grizzly population living in Glacier National Park, about 300 miles to the north. Thank you for considering my views on the proposal to delist the grizzly bear population of the Greater Yellowstone Area. Once more, I urge that this proposal be withdrawn.	FWS-R6-ES-2016-0042-5668-A1.pdf	
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I am aware of the history of grizzly bear occupancy in the Greater Yellowstone Ecosystem and am very pleased with the recovery progress made under the protection of the endangered species act. My wife and I are always thrilled (and cautious) when we see signs of the bear through tracks, diggings, claw marks and scat. ...and of course the objects of bearjams. I have attended meetings of the Interagency Grizzly Bear Committee and the recent hearing held by the Fish and Wildlife Service in Bozeman. I have read some background material, including the Executive Summary of the 2016 Conservation Strategy on the proposal and have been informed on the issue from many other readily available sources. The stated goal of delisting is to shift from managing for recovery to one of conservation. This is admirable, but is flawed under the strategy developed. 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Montana, Idaho and Wyoming exercise varying degrees of cultural and political considerations when directed to manage this nationally-important population of a scarce mammal which has been extirpated from the vast majority of its range.	FWS-R6-ES-2016-0042-5677-A1.pdf	

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Â§_â€ƒcÂ»]~.Â»h nr iw VI' â€™ fH2tâ€ƒcâ€ƒc-' if 912 VHMI:1 Hu .â€ƒcÂ·* â€™1.Â·lZl;â€ƒcCÂ»4LZÂ·c W lH RP" Fi .Â» â€™*Hâ€™W 1""Â·;â€œ'ri* _ *1: â€™U*T Zi!*Fâ€™W2"\$l" V ""Â·1 " JH 1** i **Â·*W"" w _ _ l _ P, _ _ > _ Y > _ pq, PD [1*; "\â€ƒc- l J 'Â· i; Â· -- ~â€ƒc v" str ml L[â€ƒc lajh nil T l'-; .a.â,-"\$ L9);. nl 1T H * i 1 xw "Â° ' Â·:rÂ· Â»Â·â€ƒcÂ·Â»Â·c:Â·c- ** *â€™*â€œvÂ»*<~"i".Â» F": 3 y Â·Â· Â»Â·- â€œ'Â·ii Â·Â» _ Â·`.Â·* MF ...Â»aÂ»1-Â·c. _Â·1.' _lâ€™r;Â» ~Â°a!Y1T!if mh cweÂ·JtÂ». i.Â»1 l J1 __1â€™Â»3. i Â»Â» ina iii l il' im ii Â»_ AMLEWH, ; l E â€ƒc{ -- dr- lIgums Mlgfl. l 4 Qu l'Â·â€ƒcÂ· _ * jp H" NG Ti â€ƒc~ {PEPl-ZIZIN :lÂ§â€ƒc l [61 IM-?.} V J l 'W fÂ· pi 4, Â·â€ƒc# ygygpuf W; i ig { gwyi . \Â£ng;;Â·@4)? Â»Â»Â·Â·Â»gfw?{ win; my znhpg-__J A YÂ°Q 0.Â». 'Â» _ ~ "?\$`Â» _ ( - 1 ai l t .il ie "â€™ 'ilÂ·@al TI W J â€™ _ 16 un ` Â· \ = ` l	FWS-R6-ES-2016-0042-5677-A1.pdf	

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The grizzly bears and other wildlife face new challenges due to climate change that will negatively impact their food sources and reproductive rate. The bears will be forced to take greater risks to obtain food which will lead to more conflicts with humans, and more bears killed.	Factor E	I Ms Donna Snow .Â· No. FMS â€”R[, , -1-Eg - WW2 wlg 2Â** (Ââ€” 00 +2. albvv-<S QAMJEAFMo +* WE llnhfugvdmriwwxlth {YLQWLM Nu"P CJJVM P MI6â€” ppâ€™r' liybkIhr miflztfwqk iw _2 J; Z.	FWS-R6-ES-2016-0042-5679-A1.pdf	
However,the grizzly population can hardly be considered secure, insofar as this population remains highly vulnerable to the consequences of climate change, as well as to the serious decline in the presence ofwhitebark pine, an important food source for t 1e bears.	Factor E	This letter concerns the proposal of your agency, issued on March l 1, 2016, to remove the grizzly bear population in the Greater Yellowstone Area ("GYA") from the Federal List of Endangered and Threatened Wildlife. For various reasons discussed below, I ask that this proposal be withdrawn. One ofthe main arguments advanced in support of delisting the grizzly bear population in the GYA is that both the size and range ofthe population have increased significantly since the grizzly bears were listed as endangered in 1975, to the extent that the population can now be considered as "recovered.â€”However, the grizzly population can hardly be considered secure, insofar as this population remains highly vulnerable to the consequences of climate change, as well as to the serious decline in the presence of whitebark pine, an important food source for t 1e bears. Another factor weighing against the proposal to delist the grizzly bear population of the GYA is that the bears remain geographically isolated, with the closest other significant population of grizzly bears being located at Glacier National Park, more than 200 miles to the north. Plans to create corridors that would link these two populations remain at the proposal stage. The continued isolation of the grizzlies inthe GYA highlights tl1e fact that, while the number of bears in the GYA has increased from 136 individuals in 1975 to over 700 bears today, the grizzly population has hardly "recoveredâ€œ in historical tenns, insofar as the species continues to occupy only about 2% of its former range in the lower 48 states. Global climate change and the rapid depletion ofthe earthâ€™s natural resources, as exemplified by the serious water shortages that have emerged in many areas ofthe western U.S., call on us to recognize that humankindâ€™s proper role is as a prudent steward, rather than as an absolute master of the planet. In this spirit, the policies ofthe National Wildlife Service should promote the sharing of larger areas ofthe Rocky Mountain states with the grizzly bear, instead of fostering conditions that will keep the bear effectively confined to a few comers of its once-vast habitat. I appreciate this opportunity to comment on the proposal to delist the grizzly bear population of GYA. As I have tried to explain in this letter, this proposal should not be approved.	FWS-R6-ES-2016-0042-5682-A1.pdf	

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These levels of mortality have occurred even with federal protection of the threatened and Endangered Species act. Removing T&E protection and placing it in the hands of the three states of Idaho, Montana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Climate Change Impacts The impact of climate change on Yellowstone's grizzlies is summarily dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." 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True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has . Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). An alternative , and more reasonable, hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, prim arily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement for "best science" as required by law. Genetic viability The Greater Yellowstone grizzly population is isolated from all other grizzly populations (pp . 1319 0-13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. 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Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high-elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. 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They have also proven their inability to prosecute individuals who kills species protected under the Endangered Species Act. Allowing state agencies to care for our wildlife particularly in Montana, Idaho, and Wyoming has proven fatal and devastating to the health of ecosystems . I concur with the following statement created by the Park County Environmental Council. On March 11, 2016 the US Fish and Wildlife released a proposed rule in the Federal Register (vol. 81, No. 48 , pp. 13174 - 13227) for, Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears From the Federal List of Endangered and Threatened Wildlife; Proposed Rule. Herein referred to as The Rule. Dr. Christopher Servheen, Grizzly Bear Recovery Coordinator, U.S. Fish and Wildlife Service is lead author and primary contact for The Rule . 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Removing T&E protection and placing it in the hands of the three states of Idaho, Montana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Climate Change Impacts The impact of climate change on Yellowstone's grizzlies is summarily dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. 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Herein referred to as The Rule. Dr. Christopher Servheen, Grizzly Bear Recovery Coordinator, U.S. Fish and Wildlife Service is lead author and primary contact for The Rule . The Interagency Grizzly Bear Study Team (IGBST) is the lead organization responsible for research and monitoring efforts on grizzly bears in the Greater Yellowstone Ecosystem (GYE). There is a public comment period until May 10, 2016. The following are major points are of concern identified with this proposed delisting action. Excessive, unsustainable mortality Bear mortality for 2015 amounted to approximately 70 bears, or 10% of the total population for the slowest reproducing mammal in North America. It doesn't require a Ph.D. in population ecology to realize that the mortality levels of recent years is not sustainable. These levels of mortality have occurred even with federal protection of the Threatened and Endangered Species act. Removing T&E protection and placing it in the hands of the three states of Idaho, Montana, and Wyoming is incompatible with any concept of a sustainable population, particularly when these states are either hostile to co-existence with large carnivores and/or view them only as a revenue generating commodity. Demonstrably sustainable levels of mortality must be first obtained and then maintained before the population can be considered recovered. Climate Change Impacts The impact of climate change on Yellowstone's grizzlies is summarily dismissed in The Rule (p. 13197, p. 13200), by the statement, "Most grizzly bear biologists in the United States and Canada do not expect habitat changes predicted under climate change scenarios to directly threaten grizzly bears." The only support for this statement is citation of an un-referred summary publication authored by Dr. Servheen, the principle author of The Rule. Elsewhere in the document, ample evidence is presented (pp. 13216 - 13217) that, in fact, climate change has already detrimentally affected Yellowstone's grizzly population, but this evidence is likewise summarily dismissed with the blithe statement that, 'grizzly bears are adaptable, they'll do just fine,' with little or no supporting evidence. Declining food resources Historically, there have been four critical foods for grizzlies in Yellowstone, whitebark pine seeds obtained from raiding squirrel middens, spawning cutthroat trout, congregating cutworm moths, and meat from a variety of sources. Of these four foods, two, whitebark pine seeds and cutthroat trout have been dramatically reduced in the past few years. Whitebark from a combination of the 1988 fires, an introduced fungal pathogen and an unprecedented bark beetle outbreak; and spawning cutthroat trout (losses greater than 90% in many important spawning streams) followed the introduction of Lake trout into Yellowstone Lake. Cutworm moths are an unreliable source because they migrate into high-elevation talus slopes from lower elevation agricultural fields where they are a pest. New farming technologies, like GMO crops that act as pesticides, could result in dramatic reduction of this food source as well. That leaves meat as the only remaining high-quality food resource. The Rule dismisses the loss of these critical foods by noting that grizzlies are generalists with a broad range in diet, but what really is important for maintaining the population is availability of high quality food at the right time of the year. True evaluation of alternative foods replacing these four critical foods must, at the least, account for: comparative nutritional value, risk of obtaining, energetic cost of obtaining, and seasonal abundance. This true accounting has not occurred and removal of T&E status should not be considered until it has . Carrying capacity The Rule interprets the expanding range of Yellowstone's grizzlies in as an indication that grizzlies have reached a static carrying capacity, with the inference that it is futile, and perhaps counterproductive, to increase number in the ecosystem (ref. Fig. 1 p 13180, of The Rule). An alternative , and more reasonable, hypothesis that is not considered in The Rule, is that carrying capacity itself has been reduced, primarily as a result of declining food resources. This alternative hypothesis of reduced carrying capacity, with the inference that increased range must be provided to provide adequate habitat for a truly recovered population, must be fully explored to satisfy the requirement for "best science" as required by law. Genetic viability The Greater Yellowstone grizzly population is isolated from all other grizzly populations (pp . 1319 0-13193). This raises serious questions regarding loss of genetic viability through inbreeding. The Rule assumes that the genetically effective size of the Yellowstone population is large enough to maintain genetic viability, but the research supporting this contention is based on seriously flawed assumptions. Furthermore, allowing hunting of this vulnerable population could lead to rapid directional selection resulting in a less fit and viable breeding population. Evidence supporting genetic viability of the Yellowstone Grizzly population is seriously flawed and violates the requisite principle of "Best Science." Population Estimates Accurately estimating the number of bears in a large, rugged area like the Greater Yellowstone	FWS-R6-ES-2016-0042-5313-A1.docx	

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Grizzly bears face multiple threats to persistence including the loss of their primary food resources. Currently, whitebark pine seeds, native cutthroat trout, huckleberries, army cutworm moths, elk and bison are either declining and/or are expected to decline in the foreseeable future as a result of habitat loss, climate change, drought, invasive species and other anthropogenic causes. Traditionally, whitebark pine seeds have provided a core dietary staple for grizzly bears. Yet, the whitebark pine, a species the FWS agrees warrants federal protection, is in decline because of a variety of problems. Another key source of sustenance, the cutthroat trout, has stopped spawning in all tributaries of Yellowstone Lake. Army cutworm moths, a staple for grizzly bears since the late 1990s, could likely disappear because they nectar on tundra flowers, which are highly vulnerable to global warming. Added to these threats to the sustainability of the GYE grizzly bear population, Yellowstone's Jackson and Northern Range elk herds and its Central Range bison herd are all in decline; Because of warming summer temperatures and drought severity since 2005, berries have become largely unavailable to grizzly bears. These food failures whitebark pine, cutthroat trout, huckleberries have caused grizzly bears to switch to a more meat-based diet, including domestic livestock. As a result, bears have been in conflict with humans, leading to record numbers of lethal actions taken against them. This additive mortality harms their persistence. Furthermore, biologists have noted that grizzly bear cub production has declined perhaps because of more predation on cubs by wolves and other bears as a result of their new dependence upon a meat-based diet, which puts them into greater proximity with other predators, resulting in deadly strife on grizzly bear cubs.	Factor E	We, the undersigned scientific experts, are writing to express our strong opposition to the proposal by the U.S. Fish and Wildlife Service (FWS) to remove the grizzly bears (Ursus arctos horribilis) living in the Greater Yellowstone Ecosystem (GYE) from protection as a threatened species under the Endangered Species Act (ESA), leading to Northern Rockies states' commencement of an unsustainable trophy-hunting season on GYE grizzly bears, which continue to be imperiled by resource declines, including habitat and dietary staple losses. GYE grizzly bears are not recovered. Before 1800, approximately 50,000 grizzly bears roamed the lower 48 states between Canada and Mexico. After European settlement, humans heavily persecuted grizzly bears to near eradication. Today, wild grizzly bears number fewer than 1,700 individuals in the lower 48 states while FWS claims that there are 700 grizzly bears in the GYE, this is a contested figure. Grizzly bears have not recovered across a significant portion of their range, and thus they are not recovered and should not be delisted. Trophy hunting grizzly bears would further jeopardize their persistence. Pursuant to a tri-state memo, Northern Rockies states have allocated bears for the purposes of "discretionary mortality available for regulated harvest" within the Demographic Monitoring Area (DMA) as follows: Wyoming would authorize hunting for 58% of the bear quota, Montana 34% and Idaho 8%. The number of grizzly bears states will permit for trophy hunting is unknown. While Wyoming has issued a draft grizzly bear management plan, it would inadequately protect GYE grizzly bears in the absence of a federal ESA listing because it gives broad discretion to the Wyoming Game Commission to set the manner of take (e.g., baiting, hounding, trapping, stalking), bag limits, seasons, sex ratios and age limits for grizzly bear hunting. How Idaho or Montana will permit grizzly bear hunting is also currently unknown. Under this veil of uncertainty, the FWS is rushing to close the public comment period (ignoring reasonable requests for a deadline extension justified by the voluminous documents released by FWS) in order to rapidly delist grizzly bears for what appear to be more political than scientific reasons. Such action conflicts with the ESA requirement to make listing decisions solely on the basis of the best scientific evidence available and to seek meaningful public comment on listing decisions. Grizzly bears face multiple threats to persistence including the loss of their primary food resources. Currently, whitebark pine seeds, native cutthroat trout, huckleberries, army cutworm moths, elk and bison are either declining and/or are expected to decline in the foreseeable future as a result of habitat loss, climate change, drought, invasive species and other anthropogenic causes. Traditionally, whitebark pine seeds have provided a core dietary staple for grizzly bears. Yet, the whitebark pine, a species the FWS agrees warrants federal protection, is in decline because of a variety of problems. Another key source of sustenance, the cutthroat trout, has stopped spawning in all tributaries of Yellowstone Lake. Army cutworm moths, a staple for grizzly bears since the late 1990s, could likely disappear because they nectar on tundra flowers, which are highly vulnerable to global warming. Added to these threats to the sustainability of the GYE grizzly bear population, Yellowstone's Jackson and Northern Range elk herds and its Central Range bison herd are all in decline; Because of warming summer temperatures and drought severity since 2005, berries have become largely unavailable to grizzly bears. These food failures whitebark pine, cutthroat trout, huckleberries have caused grizzly bears to switch to a more meat-based diet, including domestic livestock. As a result, bears have been in conflict with humans, leading to record numbers of lethal actions taken against them. This additive mortality harms their persistence. Furthermore, biologists have noted that grizzly bear cub production has declined perhaps because of more predation on cubs by wolves and other bears as a result of their new dependence upon a meat-based diet, which puts them into greater proximity with other predators, resulting in deadly strife on grizzly bear cubs.	FWS-R6-ES-2016-0042-5687-A1.pdf	

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Worse, if grizzly bears are delisted, the GYE bears who already live or disperse outside of the DMA’s artificial boundary will not be counted toward states’ population objectives and will likely be subject to persecution. Yet, these dispersing individuals are vital for providing connections between other populations, maintaining genetic diversity and preventing genetic drift and inbreeding depression.	Factor E	We, the undersigned scientiic experts, are writing to express our strong opposition to the pmposal by the U.S. Fish and Wildlife Service (FWS) to remove the grizzly bears (Ursus arctos horribilir) living in the Greater Yellowstone Ecosystem (GYE) from protection as a threatened species under the Endangered Species Act (ESA),' leading to Northern Rockies states’ commencement of an imsustainable trophy- hnntingz season on GYE grizzly bears, which continue to be imperiled by resomee declines, including habitat and dietary staple losses. GYE grizzly bears are not recovered. Before 1800, approximately 50,000 grizzly bea.rs roamed the lower 48 states between Canada and Mexico} After European settlement, humans heavily persecuted grizzly bears to near eradication} Today, wild grizzly bears number fewer than 1,700 individuals in the lower 48 stategs “ while FWS claims that there are 700 grizzly bears in the GYE,° this is a contested figure.? Grimly bears have not recovered across a signincant portion of their range, and thus they are not recovered and should not be delisted. Trophy hunting grizzly bears would further jeopardize their persistence. Pursuant to a tri-state memo, Northem Rockies states have allocated bears for the purposes of "discretionary mortality available for regulated harvest" within the DemogÂ-raphic Monitoring Area (DMA) as follows: Wyoming would authorize hunting for 58% of the bear quota, Montana 34% and Idaho 8%.9 The number of grizzly bears states will permit for trophy hunting is unknown. While Wyoming has issued a draft grizzly bear management plan, it would inadequately protect GYE grizzly beats in the absence of a federal ESA listing because it gives broad discretion to the Wyoming Game Commission to set the manner of take (e.g., baiting, hounding, trapping, stalking), bag limits, seasons, sex ratios and age limits for grizzly bear hunting.'Â° How Idaho or Montana will permit grizzly bear hunting is also currently unknown. Under this veil of uncertainty, the FWS is rushing to close the public comment period (ignoring reasonable requests for a deadline extension justihed by the voluminous documents released by FWS) in order to rapidly delist grizzly bears for what appear to be more political than scintiiic reasons. Such action conflicts with the ESA requirement to make listing decisions solely on the basis ofthe best scientific evidence available and to seek meaningful public comment on listing decisions. Grizzly hears face multiple threats to persistence including the loss of their primary food resotuces. Currently, whitebark pine seeds, native cutthroat trout, huckleberries, army cutworm moths, elk and bison are either declining and/or are expected to decline in the foreseeable iitture as a result of habitat loss, climate change, drought, invasive species and other anthropogenic causes. Traditionally, whitebark pine seeds have provided a core dietary staple for g1Â-izzly bears. Yet, the whitebark pine, a species the FW S agrees warrants federal protection, is in decline because of a variety of problems}! Another key source ofsustenance, the cutthroat trout, has stopped spawning in all tributaries of Yellowstone Lake}2 Army cutworm moths, a staple for grizzly bears since the late 1990â€™s, could likely disappear because they nectar on tundra flowers, which are highly vulnerable to global warming. Added to these threats to the sustainability ofthe GYE grizzly bear population, Yellowstoneâ€™s Jackson and Northern Range elk herds and its Central Range bison herd are all in decline); Because of warming summer temperatures and drought severity since 2005,M berries have become largely unavailable to grizzly bears. These food failuresâ€™whitebark pine, cutthroat trout, huckleberriesâ€™have caused grizzly bears to switch to a more meat-based diet, including domestic livestock. As a result, bears have been in conflict with humans, leading to record numbers of lethal actions taken against them." 'I'his additive mortality harms their persistence.'Â° Furthermore, biologists have noted that grizzly bear cub production has declined"â€™ perhaps because of more predation on cubs by wolves and other bears as a result of their new dependence upon a meat-based diet., which puts them into greater proximity with other predators, resulting in deadly strife on grizzly bear cubs. The loss of flora and fauna upon which grizzly bears depend in Yellowstone and Grand Teton national parks, in part, explains why grizzly bears are dispersing in greater numbers from park lands to national forests lands, which are grazed by public lands permittees, to search for food. Because of ubiquitous livestock outside of park lands, record numbers of grizzly bears have had lethal encounters."; Worse, if grizzly bears are delisted, the GYE bears who already live or disperse outside of the DMA’s artificial boundary will not be counted toward states’ population objectives and will likely be subject to persecution. Yet, these dispersing individuals are vital for providing connections between other populations, maintaining genetic diversity and preventing genetic drrjfi and inbreeding depressioralg While the conclusions of certain studies upon which the FWS relies suggest that grizzly bears have reached their carrying capacity, there is ample support for an alternative theory that bears have lost their historic dietary staples and are now tuming to both native and domestic ungulates, putting them in closer proximity to humans, wolves andlor other bears.2Â° While this shit} is occurring it is impossible to predict whether and when the GYE grizzly bear population might reach â€œca.nying capacity". FWS is not scient’callyjustif1ed in concluding with certainty that the GYE population has reached long-term stability and is therefore secure for the foreseeable future. There is far too much uncertainty reflected in the current science to justify such a conclusion; rather, the best available science and the precautionary principle demands continued federal monitoring of this vulnerable population, which will only happen with continued ESA protection. The public highly values grizzly bears. In 2015, Yellowstone received 4.1 million visits and Grand Teton had 4.6 million contributing \$890 million to Wyomingâ€™s gateway communities, and \$1.1 billion to Wyomingâ€™s overall economy. These Hgures greatly outweigh revenues generated by either Wyomingâ€™s livestock or hunting industries? Grizzly bears, in the human economy, are worth far more alive than dead. For all of these reasons, we urge you not to remove grizzly bears hom protections under the BSA. Now is the time to redouble grizzly bear conservation efforts, not decrease ~Â-Â-Â-.	FWS-R6-ES-2016-0042-5687-A1.pdf	

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Climate change is a continuing threat to grizzly bears. Whitebark pine trees, as one example, have been decimated by mountain pine beetles, white pine blister rust, and climate change. It is a documented fact that whitebark pine nuts are an important food source for grimly bears in the GYE, yet their number and availability decline each year, putting increased pressure on grizzly bears. Fish, another important source of food for grizzly bears in the GYE, are also under severe pressure because of climate change. Ever smaller snow packs, the result of climate change, have meant increasingly warm stream temperatures that damage fish populations in the GYE. Trout, for example, thrive in cold water, but river and stream temperatures in the GYE are rising in step with climate change. These injuries to grizzly bearsâ€™ food sources will only increase because climate change, by all credible scientific estimates, will worsen in the coming decades. Climate change has also led to more forest fires, of increasing severity, that damage grizzly bear habitat and put additional stress upon them. And as a direct result of climate change, grizzly bears emerge earlier each year from their dens and they are increasingly hard pressed to find food then.Climate change is not a passing phenomenon: the scientific consensus is that its impacts will worsen with the passage of time. The threat to grizzly bears from climate change is serious and will worsen in the coming decades.	Factor E	Christopher D. Meyer 210 S. 3â€™ Street Livingston, MT 59047 @0 406-222-1558â€™aÂ·Â· Â¿ 02* Public Comments Processing, ti? O Attn: Docket No. F U.S. Fish and Wildlife Service, MS: BPHC, ~Â¿Â§"â€™Â¿ 5275 Leesburg Pike, Falls Church, VA 2204]-3803.May 7, 2016 Re: proposed rule that would delist Grizzl Bears in the Greater yellowstone Ecosystem (GYE) To whom this concerns: I write in opposition to your proposal to delist grizzly bears in the Greater Yellowstone Ecosystem (GYE). The best available science and commercial data do not show that the GYE population of grizzly bears has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act. Your proposal depends heavily upon the conclusion that the population of grizzly bears in the GYE has increased. By itself an increase in population is an insufficient ground to delist a species when immediate threats to its survival are obvious and ongoing. Moreover, estimates as to the population of grizzly bears in the GYE must be viewed with tremendous skepticism because it is impossible to do more than roughly estimate their population. Crude population estimates should not be relied upon in deciding whether to st1Â-ip grizzly bears of protection that is essential to their survival. It cannot be denied that the protection of grizzly bears under the Endangered Species Act has been critical to their limited recovery. I also oppose the proposal to delist grizzly bears in the GYE because it flatly ignores the inconvenient but incontrovertible scientific evidence of serious ongoing threats to grizzly bears in the GYE. Climate change is a continuing threat to grizzly bears. Whitebark pine trees, as one example, have been decimated by mountain pine beetles, white pine blister rust, and climate change. It is a documented fact that whitebark pine nuts are an important food source for grimly bears in the GYE, yet their number and availability decline each year, putting increased pressure on grizzly bears. Fish, another important source of food for grizzly bears in the GYE, are also under severe pressure because of climate change. Ever smaller snow packs, the result of climate change, have meant increasingly warm stream temperatures that damage fish populations in the GYE. Trout, for example, thrive in cold water, but river and stream temperatures in the GYE are rising in step with climate change. These injuries to grizzly bearsâ€™ food sources will only increase because climate change, by all credible scientific estimates, will worsen in the coming decades. Climate change has also led to more forest fires, of increasing severity, that damagegrizzly bear habitat and put additional stress upon them. And as a direct result of climate change, grizzly bears emerge earlier each year from their dens and they are increasingly hardpressed to find food then. Climate change is not a passing phenomenon: the scientific consensus is that its impacts will worsen with the passage of time. The threat to grizzly bears from climate change is serious and will worsen in the coming decades. Yet another serious threat to grizzly bears in the GYE is habitat destruction. Every year new homes and developments are built in the GYE, forcing grizzly bears to relocate and further damaging their food sources. Habitat destruction is also a major threat because grizzly bears in the GYE are at great risk of becoming an island or isolated community. Grizzly bears in the GYE are indistinguishable from grizzly bears in other parts of Montana. Because grizzly bears travel substantial distances, delisting them in the GYE necessarily threatens grizzly bears from other areas, too, in Montana, Idaho, and Wyoming. As habitat destruction increases, it will become more difficult for grizzly bears in the GYE to connect with other grizzly bear populations, rendering them increasingly vulnerable to disease and genetic issues as an island community.We need not speculate about the impact of climate change and habitat destruction upon grizzly bears in the GYE. In recent years grizzly bear mortality in the GYE has increased, not decreased, because of climate change and habitat destruction, the accelerating destruction of food sources for grizzly bears in the GYE, and the mounting pressure upon them to find new food sources even at the risk of conflict with humans. Montana, Idaho and Wyoming have announced that if the grizzly bear is delisted in the GYE, they will allow trophy hunting of grizzly bears. Grizzly bears, however, reproduce extremely slowly. Trophy hunting of grizzly bears will reduce their populations and their recovery from such hunting will be extremely diiiicult, especially when they must also reckon with the aforementioned challenges from climate change and habitat destruction. For all these reasons I object to the proposal to delist grizzly bears in the GYE and urge you to reconsider your proposal. You are charged with protecting these magnificent animals and you should honor that responsibility. Thank you.Since ly, L J Christopher D. Meyer2	FWS-R6-ES-2016-0042-5688-A1.pdf	

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Bear numbers are already faltering thanks to major losses of several of the bear’s food sources. White bark pine seeds, huckleberries and cutthroat trout (now no longer spawning in Yellowstone Lake) are in dramatic decline thanks to climate change and other factors. Declines are also predicted in army cutworm moths, another important dietary element for grizzlies, and are already observed in elk and bison populations in Yellowstone, thereby causing grizzlies to prey on domestic livestock and resulting in conflict with humans and increased bear mortality.	Factor E	As a Montana resident since 1981, I’ve been privileged to observe and experience extraordinary wildlands and wildlife. As a backcountry hiking guide in Yellowstone National Park for many summers, I was further encouraged to explore and learn more of wildlands and wildlife. Because I'm temporarily out-of-state for an extended period, I only learned two days ago of the USFWS proposal to remove the grizzly bear from the US Endangered Species list- and am shocked. Grizzlies aren't "recovered". There are only enough of them for us humans not in the wildlife professions to have occasional glimpses and feel wonder and blessedness when we are fortunate enough to be aware of the presence of these magnificent beings. I strongly urge you to continue the status of the grizzly bear as an endangered species. Bear numbers are already faltering thanks to major losses of several of the bear’s food sources. White bark pine seeds, huckleberries and cutthroat trout (now no longer spawning in Yellowstone Lake) are in dramatic decline thanks to climate change and other factors. Declines are also predicted in army cutworm moths, another important dietary element for grizzlies, and are already observed in elk and bison populations in Yellowstone, thereby causing grizzlies to prey on domestic livestock and resulting in conflict with humans and increased bear mortality. Bear reproductive success has already declined as a cumulative effect due many interrelated factors – which are ultimately traceable back to climate change as well as human activities. Bears are naturally slow to replace their population – and are even slower thanks to humans’ activities, which makes their status as an Endangered Species even more necessary. The protection of the Endangered Species list was a major factor preventing the great bear’s extinction. Removing that protection and allowing the bear to be the target of trophy hunters will only guarantee its path to turn once again towards a diminished population, even more incomplete ecosystems, and eventual extinction of the bear. @\E2t’Ä©Imcmeivvyj awaylm Â·Â·Z25-34590 +r@l}v3e.tâ€˜gâ€˜l> @ I, WM	FWS-R6-ES-2016-0042-5699-A1.pdf	
Bear reproductive success has already declined as a cumulativeeffect due many interrelated factors – which are ultimately traceable back to climate change as well as human activities.	Factor E	As a Montana resident since 1981, I’ve been privileged to observe and experience extraordinary wildlands and wildlife. As a backcountry hiking guide in Yellowstone National Park for many summers, I was further encouraged to explore and learn more of wildlands and wildlife. Because I'm temporarily out-of-state for an extended period, I only learned two days ago of the USFWS proposal to remove the grizzly bear from the US Endangered Species list- and am shocked. Grizzlies aren't "recovered". There are only enough of them for us humans not in the wildlife professions to have occasional glimpses and feel wonder and blessedness when we are fortunate enough to be aware of the presence of these magnificent beings. I strongly urge you to continue the status of the grizzly bear as an endangered species. Bear numbers are already faltering thanks to major losses of several of the bear’s food sources. White bark pine seeds, huckleberries and cutthroat trout (now no longer spawning in Yellowstone Lake) are in dramatic decline thanks to climate change and other factors. Declines are also predicted in army cutworm moths, another important dietary element for grizzlies, and are already observed in elk and bison populations in Yellowstone, thereby causing grizzlies to prey on domestic livestock and resulting in conflict with humans and increased bear mortality. Bear reproductive success has already declined as a cumulative effect due many interrelated factors – which are ultimately traceable back to climate change as well as human activities. Bears are naturally slow to replace their population – and are even slower thanks to humans’ activities, which makes their status as an Endangered Species even more necessary. The protection of the Endangered Species list was a major factor preventing the great bear’s extinction. Removing that protection and allowing the bear to be the target of trophy hunters will only guarantee its path to turn once again towards a diminished population, even more incomplete ecosystems, and eventual extinction of the bear. @\E2t’Ä©Imcmeivvyj awaylm Â·Â·Z25-34590 +r@l}v3e.tâ€˜gâ€˜l> @ I, WM	FWS-R6-ES-2016-0042-5699-A1.pdf	

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We can't delist the grizzly right now, its food sources are in decline, cub mortality rate is high, there is no connectivity between the Greater Yellowstone Ecosystem and the Northern Continental Divide Ecosystem, and human caused grizzly bear deaths are at an all-time high.	Factor E	J! if C`Â· qemiuq iw _one @56* QW __ .. .... :15: .. __c  cs ww  { QM 3  * 6 Cu  r- â€™`Â·;, Â· 0 0 fs Oc `jflÃ@wnum Cv ....ad bg +0umi lywk} pmt; Em; A1-gmmqzz? gnazj! j! Cxe_. i_ __ fu igmye gc beU. .... gf fr>@ _; ` A ; F - qA,) _TL7 <><.Y*~â€™ Â¤]O,`J_~L:n,_\IÂ\$2;Â¤;.~:nlA.@;P&x;Â¤;}Â·;L;&L-Â·Â¤Â·yÂ¤,,_.;;Â¤.,% ..._j `.. gÂ· ;]IAÂ¤1f`]~\ Â· 5; _ iy _____ ____ _____. i ... 9*; - -. --â€”â€”â€”~	FWS-R6-ES-2016-0042-1226-A1.pdf	
However, in the last decade, the GYE has essentially lost all its whitebark pine to the combination of the non-native blister rust and enormous outbreaks of mountain pine beetle, both exacerbated by climate change. Meanwhile, droughts and competition from non-native lake trout have extirpated westslope cutthroat trout from Yellowstone Lake. While many bear populations may adapt to climate change fairly easily, the GYE grizzlies are losing so many crucial food resources at the same time. Grizzlies are among the slowest reproducing land mammals in North America, and it can take a long time for declining populations to recover, especially with decreasing food resources. Due to declines in key food sources and with loss and degradation of available habitat, I oppose the removal of the GYE grizzly population from the list of threatened species at this time. Â	Factor E	I oppose the delisting of the Greater Yellowstone Ecosystem grizzly bear population at this time. While the population has increased since it was listed as threatened under the Endangered Species Act, simply the number of bears in a population alone does not necessarily indicate a stable or healthy population. Stable and healthy populations are determined by genetic diversity, the proportion of females of reproductive age, population trends, and the quality of habitat. However, in the last decade, the GYE has essentially lost all its whitebark pine to the combination of the non-native blister rust and enormous outbreaks of mountain pine beetle, both exacerbated by climate change. Meanwhile, droughts and competition from non-native lake trout have extirpated westslope cutthroat trout from Yellowstone Lake. While many bear populations may adapt to climate change fairly easily, the GYE grizzlies are losing so many crucial food resources at the same time. Grizzlies are among the slowest reproducing land mammals in North America, and it can take a long time for declining populations to recover, especially with decreasing food resources. Due to declines in key food sources and with loss and degradation of available habitat, I oppose the removal of the GYE grizzly population from the list of threatened species at this time. While the current delisting proposal does address declines in whitebark pine, it fails to consider the significance of the whitebark pine nut to the GYE grizzly bear population .. Whitebark pine nuts are a high protein food source that once was abundant in the GYE and offered a concentrated food source requiring low caloric output. While bears are amazingly adaptable omnivores, they depend on abundant food resources to sustain them through both the months when they are active and through winter hibernation. There is no readily available alternative equivalent to the whitebark pine nut in the GYE. At the same time, grizzly habitat is being converted to residential subdivisions, ranches, and resorts, and as grizzlies set out to explore food resources in other areas, they meet up more and more with humans, often to their own demise. Army cutworm moths, another key food source that could potentially serve as an alternative lives high in the alpine, and their populations are vulnerable to climate change and exposure to pesticides. I applaud the conservation and management efforts that are successfully moving the Greater Yellowstone grizzly population toward recovery, but delisting the population at this time is premature.	FWS-R6-ES-2016-0042-5415-A1.docx	

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To make matters worse, Americaâ€™s great bears face the same looming threats as many species across the country due to climate change. In the last decade, climate change has decimated the Yellowstone grizzlyâ€™s most important food, the white bark pine nut.	Factor E	We are vvriting t0 thank y0u f 0r y0ur leadership 0n climate change and t0 ask f0r y0ur help: Yell0vvst0ne grizzly bears are in grave danger. Y0ur administrati0n has regrettably taken steps t0 strip the bearâ€™s federal pr0tecti0ns under the Endangered Species Act (ESA), Opening up a grizzly bear tr0phy hunt 0n the edges 0f Yell0vvst0ne Nati0nal Park. Yell0vvst0neâ€™s bears are a remnant and is0lated p0pulati0n. They must be all0vved t0 vvander safely Outside 0f Yell0vvst0ne Nati0nal Park.Americans vv0uld never accept hunting 0f Americaâ€™s bald eagle; hunting Yell0vvst0ne grizzly bears is equally unacceptable. T0 make matters vv0rse, Americaâ€™s great bears face the same l00ming threats as many species acr0ss the c0untry due t0 climate change. In the last decade, climate change has decimated the Yell0vvst0ne grizzlyâ€™s m0st imp0rtant f00d, the vvhite bark pine nut. Unf0rtunately, the March 3, 2016, delisting ann0uncement by the U.S. Eish and Wildlife Service (PWS) came paired vvith an ast0nishing declarati0n in the Eederal Register: "Therefore, vve c0nclude that the effects 0f climate change d0 n0t c0nstitute a threat t0 the [Yell0vvst0ne grizzly bear p0pulati0n] n0vv, n0r are they anticipated t0 in the f uture." This statement is even m0re disturbing in light 0f y0ur administrati0nâ€™s c0mmitment t0 addressing climate change, because climate change predicti0ns are dire f0r all 0ur planetâ€™s species. H0vv can it be that the military c0nsiders climate change in all its decisi0ns, vvhile the agency resp0nsible f0r 0ur vvildlife, the EWS, d0es n0t? The same argument- the denial 0f climate change â€” vv as used by the EWS in 2014 t0 deny listing the vv0lverine in the l0vver 48 states. On April 4, 2016, that decisi0n vv as reversed in federal c0urt, and declared "arbitrary and caprici0us." The EWS vv as Ordered t0 rec0nsider its reas0ning ab0ut climate change. Itâ€™s n0vv time f0r this federal agency t0 play catch up and use "the best available science" t0 keep grizzly bears 0n the ESA list. A critical questi0n: Wh0 benefits fr0m delisting Yell0vvst0neâ€™s grizzly bears? The Only certain Outc0me 0f delisting bears vvill be tr0phy hunts in Idah0, M0ntana and Wy0ming. We ask y0u t0 instruct 0ur federal vvildlife managers t0 Withdraw the March 3 rule and Order the EWS t0 take an0ther l00k at h0vv climate change impacts grizzly bears. Anydecision about the bearâ€™s future should be put on hold until independent scientific review can explore potential impacts to bears from climate change. We strongly suspect that Americaâ€™s great bears face a dire future, even with the continued protection of the Endangered Species Act.	FWS-R6-ES-2016-0042-5416-A1.pdf	

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I seem to recall back a couple decades ago that USFWS/ IGBST said they would endeavour to bring in 'outside' grizzly bears to augment the GYE gene pool. I feel strongly that when the Grizzly was originally listed as Threatened under the ESA back in 1975 , the starting population of (maybe) 130 grizzlies then was not sufficient for genetic viability. I still feel that way , and	Factor F	US Fish & Wildlife Service COMMENT on draft proposal to Delist the Yellowstone Grizzly I am a Wyoming native who lives in Cody , 50 miles from Yellowstone Park on the edge of the Greater Yellowstone Ecosystem. Much of my life has been spent in the backcountry of the Absaroka Range in prime grizzly habitat, and countless hours in Yellowstone Park. I reckon I have had around 200 encounters with and close range sightings of Grizzly bears in my lifetime, all good. The Great Bear is a topic of major concern in my region. I've engaged the state and federal agencies on grizzlies ands other issues for over 40 years. I feel qualified to give a considered opinion on Grizzly management. I am strongly opposed to the Delisting of the so-called Yellowstone Grizzly Bear. The proposal by USFWS to Delist the Grizzly and give management over to the states of Wyoming, Montana , and Idaho is flawed. The only reasons that justify grizzly delisting are political. The reasons against delisting are expressions of accumulated science, the ecology and range management aspects, habitat concerns , and the appalling prospect of allowing the State game agencies to " manage" grizzly bears given their track record and narrow views; e. g. the Wyoming Game and Fish draft plan for management falls apart if the goal is to assure a healthy bear population in the far future. Neither Fish & Wildlife nor Wyo Game and Fish have produced a plan to guarantee the Yellowstone Grizzly's sustainability based on the needs of the bears. All plans put forth are People Plans , not Bear Plans. Best Available Politics, not science , not genuine wildlife conservation. After 40 years and \$ 40 million in research and bear management , I expected a delisting plan that actually helped the bears. Instead we get proposals that cow-tow to special interests and decidedly non-wildlife priorities. It is disappointing that delisting looks like this. We can do better. For an animal that once ranged from Hudson Bay in Canada's northeast , all the way to the Pacific Ocean coast , and south as far as Guadalajara Mexico , the proposal to sustain the Grizzly on an island with a hard population ceiling (700 bears) and a hard population floor (500 bears) with nearly zero opportunity for that island population to expand and interchange with other grizzlies in the Rocky Mountains is patently absurd. I seem to recall back a couple decades ago that USFWS/ IGBST said they would endeavour to bring in 'outside' grizzly bears to augment the GYE gene pool. I feel strongly that when the Grizzly was originally listed as Threatened under the ESA back in 1975 , the starting population of (maybe) 130 grizzlies then was not sufficient for genetic viability. I still feel that way , and scientists have not convinced me otherwise. Talk is cheap. Mitochondrial DNA Analyses is a young science and not the USFWS' strongest suit. Forty years is far too short of a genetic interval to be manufacturing conclusions. Besides, the Yellowstone Grizzly is NOT a distinct population or even a subspecie of Ursus arctos . That is a deceit; a biological accounting trick. Sentencing the Grizzly to remain behind an artificial map line as a Distinct Population in a Demographic Monitoring Area is a huge falsehood. Surely Fish and Wildlife knows that Grizzlies are well suited to occupation of many areas of their former ranges and domains in the West . There is a lot of suitable habitat. Why doesn't USFWS have a mechanism to connect Yellowstone bears to the huge Selway-Bitterroot Wilderness of north central Idaho ? There should be provisions for safe passage in both directions from the Greater Yellowstone Ecosystem (GYE) to the Selway via the Red Rock Lakes wildlife refuge corridor. Bears should also be allowed to move up the Continental Divide north and west of Yellowstone towards Canada. The agency should also translocate GYE grizzlies to the San Juan Mountains of Colorado, and areas in northwest Colorado. The Uintah Mountains in northeast Utah should be considered for grizzly repopulation. It is disgusting to me personally that neither Grizzlies nor Grey Wolves are allowed to expand into other areas of my Wyoming without becoming a target for a rifle. The southern Wind River Mountains and Wyoming-Salt River Range deserve bears. A case could be made for the Pryor Mountains on the Montana-Wyoming border and the northern end of the adjacent Big Horn Mountains as new grizzly range. The Crow Tribe has said as much. You should listen to the Tribes on the topic of grizzlies. Frankly , if a Giant Panda bear can be relocated from the bamboo jungles of south China to the National Zoo in Washington D.C. it should be doable to move a grizzly from the North Fork of the Shoshone River at Yellowstone's east gate to the Selway-Bitterroot , a distance of 250 miles by helicopter. In both directions. That the USFWS has not instigated Grizzly Repopulation across the northern Rockies, and the State of Wyoming wants to keep X-numbers of bears inside a Zoo Zone, and not even count any bears outside that Zoo Zone as a component of bear recovery , is a terrible deceit. This one aspect ---lack of landscape expansion opportunities for the Yellowstone bear and lack of genetic connectivity with other bear populations in the Northern Rockies --- is enough to declare Delisting to be null and void. They Yellowstone Grizzly has been branded a Distinct Population Segment strictly for political reasons, and expediency. I reject that. The agency should instead look at the Yellowstone bear both as a sustainable population AND a seed population. Yet Wyoming wants to cull bear numbers to keep them in a Goldilocks gated community of not more than 700 nor less than 500 bears, and that culling will be done by hunting and other human caused mortality , i e. " management actions". Why not relocate ' surplus' bears instead , or if a problem bear raiding the tack shed or apple orchard, put them on unsupervised probation in another state with their electronic GPS necklaces ? Wyoming Game and Fish bear managers have been playing " Musical Bears" for a couple decades now , trapping bears and hauling them to some other release point over the mountain . Sometimes the same bears. Recidivist grizzlies. We have maybe six drop points in all of Wyoming. If we were doing it right, the management agency would relocate bears to 60 drop points across five states. Again , in both directions. Please do allocate the funds to buy a LOT of GPS radio collars. I am not at all opposed to trophy hunting of Grizzlies in Wyoming. I can support that . But only if the agencies agree that expanding and sustaining a growing bear population outside the proposed Grizzly DMA occurs first. We all know that in Wyoming, Grizzly	FWS-R6-ES-2016-0042-	

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They...do...not. USFWS and the IGBST cannot justify delisting the Grizzly by saying it has recovered enough to survive the challenges it faces. We all agree there are a good number of bears...600...700...maybe more , maybe less. The problem is the bear's best food supplies in the core area of Yellowstone Park have collapsed...Cutthroat trout and Whitebark pine seeds. The gross supply of ungulate meat is in shorter supply inside Yellowstone as elk numbers decline. Outside the Park in the Absaroka Range alpine scree slopes the Army Cutworm moth larva are diminishing rapidly due to threats from pesticides and the GMO crop cycle in the lowlands and agribusiness areas of the Midwest . Yellowstone grizzly are becoming Absaroka grizzly and preying on more elk calves, and more livestock. Because of all this, the bears are spreading out , and actual bear density is decreasing over units of public lands. What seems like more bears out on the fringe of the GYE and the proposed DMA are bears that are searching further and wider for food sources. Bears have been spreading out since the early 2000's , and the population number probably peaked in about 2006 . The notion advanced by the IGBST that grizzly's " Omnviory " , the ability to eat a wide variety of vegetation in lieu of less animal protein , is a deception. Grizzlies want meat. Plants are a supplement but not a substitute in the bear's preferred diet. Would you as a human omnivore enjoy being forced to eat mostly salads and give up beef, chicken , pork , fish --- your meats ? Having to work harder and further afield for food is a big challenge to grizzlies, but the real drawdown of bears has been human caused mortalities. We've been killing 50 bears a year for some time...an alarmingly high percentage. The Whitebark pine seed crop has been thin ...not for lack of trees , but because of climate changes and the alien exotic blister rust. BEars simply cannot find the quantity of pine nuts they were having 15 years ago, and the situation is getting worse. When all the factors concerning the bear's food supplies start compounding and cascading, the result is bears coming into conflict zones with humans and their guns. The population dynamic of the Yellowstone Grizzly is at a tipping point, just at the time the humans want to ratchet up all the negative mortality factors affecting bears. The Delisting proposals are designed to do one thing well: reduce bear numbers. And that's about all it does. The IGBST has deluded itself into thinking they have succeeded in recovering bears strictly by the numbers , when in fact the bears are in more danger now than they have been at any time since they were listed back in 1975. It's been a mark of shame that the raw data gathered by the IGBST and their tight circle of researchers has not been fully disseminated to qualified third parties for peer review and analysis. The so-called " Best Available Science" produced by Chris Servheen et al and the IGBST has been built to a conclusion with data massaged and computer models tweaked until it all fits the preconceived political outcome of fabricating bear numbers and management scenarios that appear to show a recovered, feisty, expanding bear population. It all borders on fraud. Besides, it's not about bear numbers , it's about bear habitat. And that is the other Achilles Heel of the proposed grizzly delisting proposal and State plans. There is no provision for sustaining critical grizzly bear habitat requirements. Nothing in the proposals will implore the Forest Service, the BLM , or States to manage for bear habitat. Those agencies will automatically without remorse defer their decisions on behalf of special interests and human stakeholders perceptions. The Grizzly can look forward to more habitat fragmentation and decline of lifestyle should delisting proceed as planned. Forty years ago when the bear was listed under the ESA, you would not have been able to find ten scientists anywhere in the USA who would tell us that Global Climate Change would be a serious challenge in decades to come. Fast forward to today , and we cannot find ten scientists who disagree that Global Climate Change is not a force majeure to be reckoned with ...in every location on the planet from below sea level to the crest of the Himalayas, on all continents. The Yellowstone Grizzly is already adversely affected by climate change , and it's not going to get better in the lifetimes of anyone reading this. Which is why strong habitat protections and enforced regulations of landscape scale issues are paramount. Too bad none of that is in the delisting proposal . The Yellowstone Grizzly's survival into the next century depends on us making the right decisions today . The Great Bear must be allowed to disperse into several surrounding states from the Yellowstone core. That dispersion must be both natural , without undue impediments. And where and when necessary we humans must relocate some numbers and demographics of bears further afield and return virile bears to the core to replenish the gene pool. I see little to nothing in the US Fish and Wildlife's intentions or the state of Wyoming's draft grizzly management plan that would guarantee the survival and virility of the Grizzly Bear in the face of the challenges it faces. I see a People Plan and a whole lotta delusional science, and some deleterious agendas at work disguised as " management". What I do not see is a genuine Grizzly bear Recovery Plan going forward that is actually based on bears, as one would think it should be. Therefore, management cannot be turned over to the States, and Fish and Wildlife as stewards of Endangered Species must retool their thinking a produce a Grizzly bear sustainability plan that puts the bears themselves at the top of the priorities. I reject the proposed Grizzly bear Delisting for all these reasons stated here, and more. Sincerely ; Dewey Vanderhoff Cody Wyoming - submitted electronically May 10 , 2016	5487-A1.rtf	

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The reasons against delisting are expressions of accumulated science, the ecology and range management aspects, habitat concerns , and the appalling prospect of allowing the State game agencies to "manage" grizzly bears given their track record and narrow views; e. g. the Wyoming Game and Fish draft plan for management falls apart if the goal is to assure a healthy bear population in the far future. Neither Fish & Wildlife nor Wyo Game and Fish have produced a plan to guarantee the Yellowstone Grizzly's sustainability based on the needs of the bears. All plans put forth are People Plans , not Bear Plans. Best Available Politics, not science , not genuine wildlife conservation. After 40 years and \$ 40 million in research and bear management , I expected a delisting plan that actually helped the bears. Instead we get proposals that cow-tow to special interests and decidedly non-wildlife priorities. It is disappointing that delisting looks like this. We can do better. 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Would you as a human omnivore enjoy being forced to eat mostly salads and give up beef, chicken , pork , fish --- your meats ? Having to work harder and further afield for food is a big challenge to grizzlies, but the real drawdown of bears has been human caused mortalities. We've been killing 50 bears a year for some time...an alarmingly high percentage. The Whitebark pine seed crop has been thin ...not for lack of trees , but because of climate changes and the alien exotic blister rust. BEars simply cannot find the quantity of pine nuts they were having 15 years ago, and the situation is getting worse. When all the factors concerning the bear's food supplies start compounding and cascading, the result is bears coming into conflict zones with humans and their guns. The population dynamic of the Yellowstone Grizzly is at a tipping point, just at the time the humans want to ratchet up all the negative mortality factors affecting bears. The Delisting proposals are designed to do one thing well: reduce bear numbers. And that's about all it does. The IGBST has deluded itself into thinking they have succeeded in recovering bears strictly by the numbers , when in fact the bears are in more danger now than they have been at any time since they were listed back in 1975. It's been a mark of shame that the raw data gathered by the IGBST and their tight circle of researchers has not been fully disseminated to qualified third parties for peer review and analysis. The so-called " Best Available Science" produced by Chris Servheen et al and the IGBST has been built to a conclusion with data massaged and computer models tweaked until it all fits the preconceived political outcome of fabricating bear numbers and management scenarios that appear to show a recovered, feisty, expanding bear population. It all borders on fraud. Besides, it's not about bear numbers , it's about bear habitat. And that is the other Achilles Heel of the proposed grizzly delisting proposal and State plans. There is no provision for sustaining critical grizzly bear habitat requirements. Nothing in the proposals will implore the Forest Service, the BLM , or States to manage for bear habitat. Those agencies will automatically without remorse defer their decisions on behalf of special interests and human stakeholders perceptions. The Grizzly can look forward to more habitat fragmentation and decline of lifestyle should delisting proceed as planned. Forty years ago when the bear was listed under the ESA, you would not have been able to find ten scientists anywhere in the USA who would tell us that Global Climate Change would be a serious challenge in decades to come. Fast forward to today , and we cannot find ten scientists who disagree that Global Climate Change is not a force majeure to be reckoned with ...in every location on the planet from below sea level to the crest of the Himalayas, on all continents. The Yellowstone Grizzly is already adversely affected by climate change , and it's not going to get better in the lifetimes of anyone reading this. Which is why strong habitat protections and enforced regulations of landscape scale issues are paramount. Too bad none of that is in the delisting proposal . The Yellowstone Grizzly's survival into the next century depends on us making the right decisions today . The Great Bear must be allowed to disperse into several surrounding states from the Yellowstone core. That dispersion must be both natural , without undue impediments. And where and when necessary we humans must relocate some numbers and demographics of bears further afield and return virile bears to the core to replenish the gene pool. I see little to nothing in the US Fish and Wildlife's intentions or the state of Wyoming's draft grizzly management plan that would guarantee the survival and virility of the Grizzly Bear in the face of the challenges it faces. I see a People Plan and a whole lotta delusional science, and some deleterious agendas at work disguised as " management". What I do not see is a genuine Grizzly bear Recovery Plan going forward that is actually based on bears, as one would think it should be. Therefore, management cannot be turned over to the States, and Fish and Wildlife as stewards of Endangered Species must retool their thinking a produce a Grizzly bear sustainability plan that puts the bears themselves at the top of the priorities. I reject the proposed Grizzly bear Delisting for all these reasons stated here, and more. Sincerely ; Dewey Vanderhoff Cody Wyoming - submitted electronically May 10 , 2016	5487-A1.rtf	

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I am strongly opposed to the Delisting of the so-called Yellowstone Grizzly Bear. The proposal by USFWS to Delist the Grizzly and give management over to the states of Wyoming, Montana , and Idaho is flawed. The only reasons that justify grizzly delisting are political. The reasons against delisting are expressions of accumulated science, the ecology and range management aspects, habitat concerns , and the appalling prospect of allowing the State game agencies to " manage" grizzly bears given their track record and narrow views; e. g. the Wyoming Game and Fish draft plan for management falls apart if the goal is to assure a healthy bear population in the far future. Neither Fish & Wildlife nor Wyo Game and Fish have produced a plan to guarantee the Yellowstone Grizzly's sustainability based on the needs of the bears. All plans put forth are People Plans , not Bear Plans. Best Available Politics, not science , not genuine wildlife conservation. After 40 years and \$ 40 million in research and bear management , I expected a delisting plan that actually helped the bears. Instead we get proposals that cow-tow to special interests and decidedly non-wildlife priorities. It is disappointing that delisting looks like this. We can do better. For an animal that once ranged from Hudson Bay in Canada's northeast , all the way to the Pacific Ocean coast , and south as far as Guadalajara Mexico , the proposal to sustain the Grizzly on an island with a hard population ceiling (700 bears) and a hard population floor (500 bears) with nearly zero opportunity for that island population to expand and interchange with other grizzlies in the Rocky Mountains is patently absurd. I seem to recall back a couple decades ago that USFWS/ IGBST said they would endeavour to bring in 'outside' grizzly bears to augment the GYE gene pool. I feel strongly that when the Grizzly was originally listed as Threatened under the ESA back in 1975 , the starting population of (maybe) 130 grizzlies then was not sufficient for genetic viability. I still feel that way , and scientists have not convinced me otherwise. Talk is cheap. Mitochondrial DNA Analyses is a young science and not the USFWS' strongest suit. Forty years is far too short of a genetic interval to be manufacturing conclusions. Besides, the Yellowstone Grizzly is NOT a distinct population or even a subspecie of Ursus arctos . That is a deceit; a biological accounting trick. Sentencing the Grizzly to remain behind an artificial map line as a Distinct Population in a Demographic Monitoring Area is a huge falsehood. Surely Fish and Wildlife knows that Grizzlies are well suited to occupation of many areas of their former ranges and domains in the West . There is a lot of suitable habitat. Why doesn't USFWS have a mechanism to connect Yellowstone bears to the huge Selway-Bitterroot Wilderness of north central Idaho ? There should be provisions for safe passage in both directions from the Greater Yellowstone Ecosystem (GYE) to the Selway via the Red Rock Lakes wildlife refuge corridor. Bears should also be allowed to move up the Continental Divide north and west of Yellowstone towards Canada. The agency should also translocate GYE grizzlies to the San Juan Mountains of Colorado, and areas in northwest Colorado. The Uintah Mountains in northeast Utah should be considered for grizzly repopulation. It is disgusting to me personally that neither Grizzlies nor Grey Wolves are allowed to expand into other areas of my Wyoming without becoming a target for a rifle. The southern Wind River Mountains and Wyoming-Salt River Range deserve bears. A case could be made for the Pryor Mountains on the Montana-Wyoming border and the northern end of the adjacent Big Horn Mountains as new grizzly range. The Crow Tribe has said as much. You should listen to the Tribes on the topic of grizzlies. Frankly , if a Giant Panda bear can be relocated from the bamboo jungles of south China to the National Zoo in Washington D.C. it should be doable to move a grizzly from the North Fork of the Shoshone River at Yellowstone's east gate to the Selway-Bitterroot , a distance of 250 miles by helicopter. In both directions. That the USFWS has not instigated Grizzly Repopulation across the northern Rockies, and the State of Wyoming wants to keep X-numbers of bears inside a Zoo Zone, and not even count any bears outside that Zoo Zone as a component of bear recovery , is a terrible deceit. This one aspect ---lack of landscape expansion opportunities for the Yellowstone bear and lack of genetic connectivity with other bear populations in the Northern Rockies --- is enough to declare Delisting to be null and void. They Yellowstone Grizzly has been branded a Distinct Population Segment strictly for political reasons, and expediency. I reject that. The agency should instead look at the Yellowstone bear both as a sustainable population AND a seed population. Yet Wyoming wants to cull bear numbers to keep them in a Goldilocks gated community of not more than 700 nor less than 500 bears, and that culling will be done by hunting and other human caused mortality , i e. " management actions". Why not relocate ' surplus' bears instead , or if a problem bear raiding the tack shed or apple orchard, put them on unsupervised probation in another state with their electronic GPS necklaces ? Wyoming Game and Fish bear managers have been playing " Musical Bears" for a couple decades now , trapping bears and hauling them to some other release point over the mountain . Sometimes the same bears. Recidivist grizzlies. We have maybe six drop points in all of Wyoming. If we were doing it right, the management agency would relocate bears to 60 drop points across five states. Again , in both directions. Please do allocate the funds to buy a LOT of GPS radio collars. I am not at all opposed to trophy hunting of Grizzlies in Wyoming. I can support that . But only if the agencies agree that expanding and sustaining a growing bear population outside the proposed Grizzly DMA occurs first. We all know that in Wyoming, Grizzly	FWS-R6-ES-2016-0042-	

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they were having 15 years ago, and the situation is getting worse. When all the factors concerning the bear's food supplies start compounding and cascading, the result is bears coming into conflict zones with humans and their guns.	Factor L	Delisting is a euphemism for Hunting. Fine. So long as all the tools in the management toolbox , not just the .30-06 rifle with 3x-9x scope , are employed across the Big Picture Landscape of Idaho-Montana-Wyoming-Colorado-Utah - and ??? Grizzly Bears are worth far more alive than dead. The proposed delisting plans (state and federal) seem to emphasize more Dead than Alive when it comes to hands-on bear management. It is regrettable the attitude behind that is so baked in to existent wildlife technocrats and bureaucrats, and narrowminded stakeholders. It is almost as bad as the notion that bear biologists and bear managers actually believe they know bears. They...do...not. USFWS and the IGBST cannot justify delisting the Grizzly by saying it has recovered enough to survive the challenges it faces. We all agree there are a good number of bears...600...700...maybe more , maybe less. The problem is the bear's best food supplies in the core area of Yellowstone Park have collapsed...Cutthroat trout and Whitebark pine seeds. The gross supply of ungulate meat is in shorter supply inside Yellowstone as elk numbers decline. Outside the Park in the Absaroka Range alpine scree slopes the Army Cutworm moth larva are diminishing rapidly due to threats from pesticides and the GMO crop cycle in the lowlands and agribusiness areas of the Midwest . Yellowstone grizzly are becoming Absaroka grizzly and preying on more elk calves, and more livestock. Because of all this, the bears are spreading out , and actual bear density is decreasing over units of public lands. 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Factor E	Comments on Yellowstone Grizzly Delisting To: Docket No. FWS-R6-ES-2016-0042 May 10, 2016 The grizzly is an icon, a monarch representing wildness, individuality and strength. Its pending recovery is a testament to these qualities and to effective protections of the Endangered Species Act. The American taxpayer has invested \$100â€™s of millions bringing back this magnificent species from the threshold of extinction. However, recovery w hile promising remains tenuous. Delisting of the Yellowstone grizzly bear is premature. To delist now is to waste the enormous trust and taxpayer dollars the American people have placed in the U.S. Fish and Wildlife Service and the good work of scientists and other employees. Two perspectives form rationales for maintaining ESA protections for the grizzly; one based on the role of the grizzly as the top predator on the landscape. The other is the grizzlyâ€™s vulnerability in the face of human development and climate change. The Greater Yellowstone ecosystem (GYE) is an island, surrounded by private and even public lands that hold threats to the grizzlyâ€™s recovery. The grizzly is a wide-roaming species; it cannot recover on an island. The proposal does not adequately provide for needed connectivity between the GYE and other ecosystems. The Selway-Bitterroot must be occupied before the Yellowstone grizzly is delisted. The Bitterroot is the pathway to the Northern Continental Divide and Cabinet-Yaak ecosystems. The grizzly occupies less than 2% of its historic range and populations in the GYE and NCDE are paltry compared to historic levels. Connectivity, both habited and genetic, needs to occur at the landscape scale before the grizzly can be safely delisted. Demographic connectivity areas need to be identified and people educated to respect the grizzly. Without connectivity, there is no recovery. 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Just as Americanâ€™s have gotten bigger, though not necessarily healthier due to increased protein, the grizzly too can mask nutritional deficiencies as it relies more on meat based foods. In addition to unknown and untested effects of changes in a full spectrum of nutritional values, securing these meat-based sources presents increased risks to the grizzly. Access to meats whether by livestock predation or attraction to the scent of a fresh elk carcass comes with human conflict, and in this the grizzly is the more vulnerable. In recent years grizzly population growth has stagnated. More cubs and yearlings are dying. In 2015, there were 60 grizzly mortalities in the GYE as a result of human conflicts and other interactions. This is clearly not sustainable. It could throw any calculated average mortality formula out of the delisting ballpark. These need to be recalculated given the increase in mortalities in 2015. At this point, landowners and state agencies are getting â€”trigger-happyâ€” and the mortality rate in 2016 could be as high or higher. The prospect of delisting makes it hard for many to hide their absence of tolerance and they may not be able to control themselves. People and bears can co-exist but many do not know it, because of tolerance of political hostility towards these magnificent creatures. The proposed delisting does not adequately address ways to mitigate the conflict and underestimates the virulence with which many, though not all, in the livestock industry perceive the grizzly and other predators. The FWS has only to look at the recent wolf delisting to get the picture of what awaits the grizzly. Since the Rocky Mountain Gray Wolf was delisted in 2011, its population has declined from a minimum of 653 wolves to 527 at the end of 2015. That is a decline of almost 25 percent, even in a rapidly reproducing species as compared to the grizzly. This drastic drop in population and disregard of the wolfâ€™s ecological role on the landscape is intentional. I personally have testified before numerous committees of the Montana legislature in the last two sessions. I also have testified at MT Fish Wildlife and Parks hearings. The political vitriol for the wolf is repugnant. Montana law has made it easy to hunt, trap and kill wolves, extended wolf-hunting seasons into spring when mothers carry their unborn, increased wolf â€”bagâ€” limits, instituted practices that strip fair chase hunting of any meaning, and allows landowners to kill a wolf at â€”perceived threatâ€”. As bad as Montana is, Idaho is worse: There, entire wolf packs are aerial gunned in remote areas, professional hunters are hired to kill wolves in designated wilderness, and the budget for state sanctioned killing of wolves is increasing. FWS is lying to itself and the American people, if it doesnâ€™t acknowledge that a similar fate awaits the grizzly upon delisting. 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People and bears can co-exist but many do not know it, because of tolerance of political hostility towards these magnificent creatures. The proposed delisting does not adequately address ways to mitigate the conflict and underestimates the virulence with which many, though not all, in the livestock industry perceive the grizzly and other predators. The FWS has only to look at the recent wolf delisting to get the picture of what awaits the grizzly.	Factor E	Comments on Yellowstone Grizzly Delisting To: Docket No. FWS-R6-ES-2016-0042 May 10, 2016 The grizzly is an icon, a monarch representing wildness, individuality and strength. Its pending recovery is a testament to these qualities and to effective protections of the Endangered Species Act. The American taxpayer has invested \$100â€™s of millions bringing back this magnificent species from the threshold of extinction. However, recovery w hile promising remains tenuous. Delisting of the Yellowstone grizzly bear is premature. To delist now is to waste the enormous trust and taxpayer dollars the American people have placed in the U.S. Fish and Wildlife Service and the good work of scientists and other employees. Two perspectives form rationales for maintaining ESA protections for the grizzly; one based on the role of the grizzly as the top predator on the landscape. The other is the grizzlyâ€™s vulnerability in the face of human development and climate change. The Greater Yellowstone ecosystem (GYE) is an island, surrounded by private and even public lands that hold threats to the grizzlyâ€™s recovery. The grizzly is a wide-roaming species; it cannot recover on an island. The proposal does not adequately provide for needed connectivity between the GYE and other ecosystems. The Selway-Bitterroot must be occupied before the Yellowstone grizzly is delisted. The Bitterroot is the pathway to the Northern Continental Divide and Cabinet-Yaak ecosystems. The grizzly occupies less than 2% of its historic range and populations in the GYE and NCDE are paltry compared to historic levels. Connectivity, both habited and genetic, needs to occur at the landscape scale before the grizzly can be safely delisted. Demographic connectivity areas need to be identified and people educated to respect the grizzly. Without connectivity, there is no recovery. Within the GYE, climate change is eating away at the whitebark pine, the preferred food source of the grizzly. This nutrient rich food is particularly important for females, the slowest reproducing mammals in North America. Other sources such as army moths and a range of berries are similarly vulnerable to climate change. Climate change also means less reliable snowpack and earlier emergence from the den leading to a longer non-denning season during which the grizzly needs food. While the grizzly is resourceful and as the top predator, capable of substituting other foods, the effects of the decline in whitebark pine cannot be certain since not enough science has been done or time lapsed to accurately assess changes such as fecundity rate and body weight. Observations of these changes could lag years or decades behind. Just as Americanâ€™s have gotten bigger, though not necessarily healthier due to increased protein, the grizzly too can mask nutritional deficiencies as it relies more on meat based foods. In addition to unknown and untested effects of changes in a full spectrum of nutritional values, securing these meat-based sources presents increased risks to the grizzly. Access to meats whether by livestock predation or attraction to the scent of a fresh elk carcass comes with human conflict, and in this the grizzly is the more vulnerable. In recent years grizzly population growth has stagnated. More cubs and yearlings are dying. In 2015, there were 60 grizzly mortalities in the GYE as a result of human conflicts and other interactions. This is clearly not sustainable. It could throw any calculated average mortality formula out of the delisting ballpark. These need to be recalculated given the increase in mortalities in 2015. At this point, landowners and state agencies are getting â€”trigger-happyâ€” and the mortality rate in 2016 could be as high or higher. The prospect of delisting makes it hard for many to hide their absence of tolerance and they may not be able to control themselves. People and bears can co-exist but many do not know it, because of tolerance of political hostility towards these magnificent creatures. The proposed delisting does not adequately address ways to mitigate the conflict and underestimates the virulence with which many, though not all, in the livestock industry perceive the grizzly and other predators. The FWS has only to look at the recent wolf delisting to get the picture of what awaits the grizzly. Since the Rocky Mountain Gray Wolf was delisted in 2011, its population has declined from a minimum of 653 wolves to 527 at the end of 2015. That is a decline of almost 25 percent, even in a rapidly reproducing species as compared to the grizzly. This drastic drop in population and disregard of the wolfâ€™s ecological role on the landscape is intentional. I personally have testified before numerous committees of the Montana legislature in the last two sessions. I also have testified at MT Fish Wildlife and Parks hearings. The political vitriol for the wolf is repugnant. Montana law has made it easy to hunt, trap and kill wolves, extended wolf-hunting seasons into spring when mothers carry their unborn, increased wolf â€”bagâ€” limits, instituted practices that strip fair chase hunting of any meaning, and allows landowners to kill a wolf at â€”perceived threatâ€”. As bad as Montana is, Idaho is worse: There, entire wolf packs are aerial gunned in remote areas, professional hunters are hired to kill wolves in designated wilderness, and the budget for state sanctioned killing of wolves is increasing. FWS is lying to itself and the American people, if it doesnâ€™t acknowledge that a similar fate awaits the grizzly upon delisting. If the Yellowstone grizzly is delisted, FWS can count itself as an accomplice. The proposed plan accepts a smaller population, ostensibly based on science. Yet, it has not adequately factored in the political vitriol as evidenced by delisting of the Rocky Mountain Gray Wolf. Based on the wolf example, delisting of the Yellowstone grizzly is nothing short of a license to kill, in more ways than the proposed trophy hunt. It is wishful thinking on the part of State wildlife management agencies so they can respond to political prodding by the powerful livestock industry and remove a â€”perceived threatâ€” that puts them in the cross hairs. Grizzly bears are making a slow recovery thanks to protection of the Endangered Species Act. However, they remain vulnerable due to shifting food sources, isolation, an increase in preventable conflicts with hunters and livestock, and an hostile political climate. All of these issues need to be addressed prior to delisting. Now is NOT the time to strip the grizzly of ESA protections. The perceived recovery is too tenuous. Delisting will reverse any hard fought and expensive gains. The ESA and the FWS still have more work to do. Please do your work and do NOT delist. Submitted by, Claudia Narcisco 5607 Gharrett Ave.	FWS-R6-ES-2016-0042-5542-A1.docx	

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They are part of the Yellowstone ecosystem and once gone can never be replaced.	Miscellaneous	. Â· ex, Public Comments Processing Attn: Docket No. FWS-R6â€™ES-2015-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. 'Tlâ€™~I@2â€™™E: [5 /\â€™~BsÂ¤i.uÂ·CQ_;Z Nm Âšîâ€™~Z.."LL;j] . jg] ggg 'P><Â¢2S1' <bl:â€™~Tl:\<E- Ecogsg AN; clout; esswÃ©gg jggit E:] @" Lt. S. ;;;,tts>t_Â¢F.Â¢; f[(Â£â€™"i-.. f` f@ 'B=-=Â·=â€™"=â€™" Â©Â·@iz. gl \$571 I~Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. }â€™™Â¢EPÂ¢SÂ£,Qgiu 'I D E.-- br.l' [Z 4;-[5 glu ZLLV gÃ©glg vu ng [Hi guicrnyn} gwrluguygi my mg M0 6 Z; g gy we cr. CONrJÂ£.cTc,0 Â¤lr ,l;{&\$;]1l;[EM [C gow gig J5 egg/cg;) , Ai-Jâ€™~O A; ?0@vcNrzvM <rF gÃ©ggf gggc/=t> gf ALwvJEO IQ ru gz 5-scw/lj â€™ E rrrgggqq ;. 5 r,gg,J Hm L c U; Yifi Q ([546 g Q . gcgcicca ll QE BRC-NAA/Â· Nâ·,-7~Public Comments Processing Attn: Docket No. FWS-R6-ESâ€™2016-0042 U.S. Fish and Wildlife Service VIS:BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. .._j l 74/ /114 4IAI AÃ©Ã© Ka, wz. @23- we /44224 x4â€™™ T1; ..1 1. ul, Â·Â· /&Z6Dq zu .4 11 JL.;} A1 Â·Â·Â· AJ r . # i d'/4 7 Â¢ , _ 1 / / Â·Â·â€™™ Â·- I . {J Q,. AQAM.4 _Â·» rz, ro i,l v JMX . â€™™ â€™~ ;. new ,.. r' .4*;;. (H A _ M l if In;Â·» â€™™ â€™~ Â© mz /O l Â¤/me H,/1... F A./n. Al _ 1 â€™¢,Â·» ,. zi ,Â·» mi;; _ ' . rd;? _ Â·» Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I " â€™ r r 1 l â€™" *4*%/ 14 llÂ· A Â· 5 ' l . , â€™" Â·» G, r ' ipidrll mobil E r' â€™ . A l lj 'YL V pi zazzF, "" JI ...L.'.Â·» :id . Lia @% __ rw/lll' *1 / P lÃ© gtzÃ©gztl~lÂ·` iâ€™œ` â€™ `~â€™"Â· ..â€™~â€™~â€™iv Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife SenrlceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I lgfm gm {he viog /\L Â¤L www Aer 0 t/kskg 5 ok @ ul/All Eg Â· --`[ Avi/\ Qkgg gm; Qwvxeg ln a Ol `kfk â€™ LAAAQY -= AA \\A(Â·;* â€™¢ â€™™ ' A V\ Q~` Q' Q .i.31,_T Publlic Comments Processing Attn: Docket No. FWSâ€™R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. ggnii-L\r' l Â· _ Â· Â¤ J â€™¢â€™~l V l l i Public Comments Processing Q) Attn: Docket No. FWS-R6-ES-2016-0042 *lâ·,-'H' Bâ€™™BlO9.Y` U.S. Fish and Wildlife Service . szvs Leesburg Pike Gp ze mw. M T" Falls Church, VA 22041-3803 ( C; â€™~i 7 l S` _ iq Please accept my following comments on Fish and Wildlife Serviceâ€™s proposal to remove Endangered qcb _ . Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. lab? kv BB? glg? cov ygiew `Fâ€™™ 15 QE dlweoc Qvizzlrf lOQ.:c;/ g remgv-ed EgÃ©kgiig gg Sqdgg Ad". {Lrg; ggalwvcn ag still urccl -â€™"- vwgxe. Sjyglhfh igâ€™ZJ wevvc xi lg Q; ..~\0v~Q :v~Â·\l.P<.Jvâ€™™\`2r/xlj apt/{ om});. jg â€™~B\\<JÂ¤=->%v h lmhifaljhi kaeav ygcwg ew [-eg @PE\glvÂ¤Â¤A Â· Pkifgg mgcwgrdcmgyg â€™~zÂ·Â·~.dL 2-No Lo uglggitq gm c.Â¤ 0 vypm~~ _ s -â€™~ . 3% Public Comments Processing Attn: Docket No. FWS-R6â€™E5-2016-0042 U.S. Fish and Wildlife SenriceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. â€™~ 5 , 1 , l , â€™¢ ` Â· gÂ·».._n :.1...- 1 a V5l â€™¢. Kl O Â· E, .Â· nv â€™~ 0 & AAA O1 Â· â€™~ â€™" ' lazaxs La 4; .1 .. qquue-. 1 L.: &6Â¤4Y`vuL,â€™~iÂ¤`Ejofi	FWS-R6-ES-2016-0042-5663-A1.pdf	

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The financial gain for a few outfitters + the FWP, and the trophy opportunity for a few hunters hardly outweighs the loss to the tourist economy which likes to see a bear + these same people become great marketers for the tourist economy when they do see a bear.	Miscellaneous	. Â· ex, Public Comments Processing Attn: Docket No. FWS-R6â€”ES-2015-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. 'Tlâ€™~I@2â€™™E: [5 /\â€™~BsÂ¤i.uÂ·CQ_;Z Nm Â¤šîâ€™~Z.."LL;j] . jg] ggg 'P><Â¢2S1' <bl:â€™~Tl:\<E- Ecogsg AN; clout; esswÃ©gg jggit E:] @" Lt. S. ;;;,tts>t_Â¢F.Â¢; f[(Â£â€™~i-.. f` f@ 'B=-=Â·=â€™=â€™” Â©Â·Â©iz. gl \$571 I~Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. }â€™™Â¢EPÂ¢SÂ£,Qgiu 'I D E.-- br.l'[Z 4;-[5 glu ZLLV gÃ©glg vu ng [Hi guicrnyn} gwrluguygi my mg M0 6 Z; g gy we cr. CONrJÂ£.cTc,0 Â¤lr ,l;{&\$;]1l;[EM [C gow gig J5 egg/cg;) , Ai-Jâ€™~O A; ?0@vcNrzm <rF gÃ©ggf gggc/=t> gf ALwvJE0 IQ ru gz 5-scw/lj â€™” E rrrgggqq ;. 5 r,gg,J Hm L c U; Yifi Q ([546 g Q . ggcgccia ll QE BRC-NAA/Â· Nâ·,-7~Public Comments Processing Attn: Docket No. FWS-R6-ESâ€™”2016-0042 U.S. Fish and Wildlife Service VIS:BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. .._j l 74/ /114 4IA AÃ©Â·Â© Ka, wz. @23- we /44224 x4â€™™ T1; ..1 1. ul, Â·Â· /&Z6Dq zu .4 11 JL.;} A1 Â·Â·Â·Â· AJ r . # i d'/4 7 Â¢ , _ 1 / / Â·Â·â€™™ Â·- I . {J Q,. AQAM.4 _Â·» rz, ro i,l v JMX . â€™™ â€™” ;. new ,.. r' .4*;;. (H A _ M l if ln;Â·» â€™™ â€™” Â·Â© mz /O l Â¤/me H,/1... F A./n. Al _ 1 â€™¢,Â·» ,. zi ,Â·» mi;; _ ' . rd;? _ Â·» Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I " â€™” r r 1 l â€™” *4*%/ 14 llÂ· A Â· 5 ' l . , â€™” Â·» G, r ' ipidrll mobil E r' â€™” . A l lj 'YL V pi zazzF, "" JI ...L.'.Â·»:id . Lia @% __ rw/lll' *1 / P lÃ© gtzÃ©gztl~lÂ·` iâ€™œ` â€™” `~â€™”"Â· ..â€™~â€™~â€™œ iv Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife SenrlceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Serviceâ€™™s proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. I lgfm gm {he viog /\L Â¤L www Aer 0 t/kskg 5 ok @ ul/All Eg Â· --`[ Avi/\ Qkgg gm; Qwvxeg ln a Ol `kfk â€™” LAAAQY -= AA \\A(Â·;* â€™¢ â€™™ ' A V\ Q~` Q' Q .i.31,_T Public Comments Processing Attn: Docket No. FWSâ€™”R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. ggnii-L\r' l Â· _ Â· Â· J â€™¢â€™”l V l l i Public Comments Processing Q) Attn: Docket No. FWS-R6-ES-2016-0042 *lâ·,-'H' Bâ€™™BlO9.Y` U.S. Fish and Wildlife Service . szvs Leesburg Pike Gp ze mw. M T" Falls Church, VA 22041-3803 ( C; â€™~i 7 l S` _ iq Please accept my following comments on Fish and Wildlife Serviceâ€™™s proposal to remove Endangered qcb _ . Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. lab? kv BB? glg? cov ygiew `Fâ€™™ 15 QE dlweoc Qvizzlrf l0Q.:c;/ g remgv-ed EgÃ©kgiig gg Sgqdbg Ad". {Lrg; ggalwvcm ag still urccl -â€™”- vwgxe. Sjyglhfh igâ€™œJ wevc xi lg Q; ..~\0v~Q :v~Â·\l.P<.Jvâ€™™\`2r/xlj apt/{ om};. jg â€™”B\\<JÂ¤=->%v h lmhifaljhi kaeav ygcwg ew [-eg @PE\glvÂ¤Â¤A Â· Pkifgg mgcwgrdcmyg â€™”zÂ·Â·~.dL 2-No Lo uglggitq gm c.Â¤ 0 vypm~` _ s -â€™” . 3% Public Comments Processing Attn: Docket No. FWS-R6â€™”E5-2016-0042 U.S. Fish and Wildlife SenriceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. â€™” 5 , 1 , l , â€™¢ `Â· gÂ·».._n :.1...- 1 a V5l â€™¢. Kl O Â· E, .Â· nv â€™” 0 & AAA O1 Â· â€™” â€™” ' lazaxs La 4; .1 .. qquue-. 1 L.: &6Â¤4Y`vuL,â€™”iÂ¤`Ejofi	FWS-R6-ES-2016-0042-5663-A1.pdf	

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The economic opportunities of keeping the grizzly bear protected far out way delisting and the opportunity for states to implement a hunt. The world's most famous grizzly bear #399 dens outside of Yellowstone in Wyoming. She will be shot if there is a hunt. There will be global outcry like Cecil the Lion. And the famous grizzly Scarface was just shot outside of Yellowstone.	Miscellaneous	I am writing in opposition to the delisting of the Yellowstone grizzly bear. I agree with Jane Goodall, Edward O. Wilson, Ted Turner, Mike Finley (former Yellowstone Superintendent), George Schaller, grizzly bear expert Doug Peacock, whitebark pine specialist Dr. Jesse Logan, and Dr. David Matson (retired Yellowstone grizzly bear biologist) that it is premature to consider delisting. The decline of their food sources, genetic isolation, and climate change are just a few issues threatening the grizzly bear. And the thought of the states around Yellowstone conducting a trophy hunt is just appalling and inappropriate. With the limited food resources like the pine nut from the whitebark pine tree and the Yellowstone cutthroat trout, the bears are leaving the park to forage. Grizzlies are one of the slowest reproducing mammals and the reproduction rate is in jeopardy due to the these limited food resources. Females can only breed every three years and then the success of their cub reaching adulthood is stacked against them. When the whitebark pine was plentiful, a grizzly sow with cubs would have plenty of food at a high elevation. Now with climate change decimating the whitebark pine tree, the grizzly sow and cubs have to forage in lower elevations competing for food resources with male grizzlies who kill cubs. With bears transitioning to eating more meat, it is even more important to have habitat around the park for the bears and the Yellowstone bison. The Yellowstone grizzlies are an isolated population. Until there is a plan to create corridors and connectivity with the Northern Rockies Continental Divide Ecosystem population, it is premature to delist the bear. It is imperative that there is connectivity. There is potential north of Yellowstone to connect to the Bob Marshall Complex. And also to the west along the Continental Divide to the Salmon/Selway/Bitterroot Complex. Instead of spending money on delisting we should be focusing on wildlife overpasses and underpasses and the importance of connecting these wild places. Grizzlies need to be reintroduced with full endangered species protection to the Salmon/Selway/Bitterroot Complex to help jump start this connectivity and genetic diversity. The April 20, 2016 NOVA special Wild Ways addressed the importance of connectivity. The preeminent biologist and Pulitzer prize winning author Edward O. Wilson has a new book call Half-Earth suggesting that we set aside half the earth in order to prevent the mass extinction that is underway. The scientific community realizes it is essential for the long term success of species to have genetic diversity and connectivity. The economic opportunities of keeping the grizzly bear protected far out way delisting and the opportunity for states to implement a hunt. The wor d's most famous grizzly bear #399 dens outside ofYellowstone in Wyoming. She will be shot if there is a hunt. There will be global outcry like Cecil the Lion. And the famous grizzly Scarface was just shot outside of Yellowstone. In April 2016, a l\lontana Federal Judge issued an order last week reversing the U.S. Fish and Wildlife Service's decision to not list the wolverine. This was due to them not considering the impacts of climate change. There will be lawsuits for the same reason if you delist the grizzly bear. The United States military considers global warming a factor in all it's decisions, why doesn't the U.S. Fish and Wildlife Service. The agency need an overhaul using the best science available and also having it peer reviewed and available to the public. Instead of wasting all that taxpayer money on lawsuits. Let's invest in corridors, education, tourism, reintroduction into the Salmon/Selway/Bitterroot Complex. How can we delist the grizzly bear with these threats? The threat of climate of change is a huge unknown even for our own species. The loss of habitat, biodiversity, connectivity, and food resources threaten the safety and security of the grizzly bear for future generations. Please do not delist the grizzly bean	FWS-R6-ES-2016-0042-5145-A1.pdf	

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Economics: There has been new economic information on the value of Grizzly bears for tourism. The study showed that Grizzly bear are an economic driver for tourism. Hunting Griz will hopefully create tourism boycotts.	Miscellaneous	5-9-16 To whom this does concern, Please accept these comments on the premature Grizzly bear delisting that is proposed the USFWS. I am very supportive of delisting Grizzly bears if the population, habitat and food sources are secure to allow for populations to reach historic levels and fill historic habitat . As it is now the USFWS and states are satisfied if the population is well below the historic population of 50.000 Grizzly bears. The listing is unwarranted because the population to be unlisted is small and does not include the historic range of the bears. The piecemeal delisting in one small area of the historic range will not truly recover the species. Griz should not be delisted around Yellowstone National Park when Grizzly bear are not present or struggles to survive in 98% of their historic range. Canada has for many years been looked at as a genetic supplier for many species into the US. The population of Grizzly in Canada is also decreasing due to loss of habitat , roads, oil and gas development, mining and hunting, housing, ranching, farming, etc. These are the same pressures and demands that the US puts on historic Grizzly bear habitat. This delisting will create an island with delisted bear that will become inbred as wildlife corridors have not been determined and protected from fragmentation, road building and human growth in valleys as is easily seen in the included maps. Until hard management strategies are in place to limit human activity (hunting of Grizzly, road building, climate change, trash storage, grazing, weeds, logging, human development of valleys and a basic understanding that Grizzly bear do not have other places to live) any delisting will be the end of this top predator . People need to understand that they live in Grizzly bear habitat out of choice. Grizzly bear do not have this choice of where to live . People need to stop being so self-centered and become educated on how people must change their behaviors to accommodate the needs of Grizzly bear to survive in the long term. The USFWS needs to take on this challenge to educate people on the needs of Grizzly bears and actions that are required to enhance and enlarge places that grizzly bear can live in safety . Hunting: The hunting of Grizzly bear is unacceptable for any reason. The Grizzly bear need to have the same protections as Bald eagles where the eagles are delisted and people cannot hunt them. The states protection of Grizzly bear did not work in the past and will not work in the future without mandates from the USFWS that any future delisting will not allow for hunting until the population reestablishes historic populations of 50,000. A population of 600 Griz is too small to be a viable population. I doubt that the USFWS would consider at a population of 600 humans in the greater Yellowstone as viable if there were only 1200 ,+/-more humans in the lower 48 states. The reason a hunting ban is imperative is due to listening to a Montana Fish Wildlife and Parks employee saying “that deer populations are increasing in Montana and we hunt them. And the Grizzly bear will do fine hunting them too .” The mindset that Grizzly bear are like deer is ludicrous. Also whitetail and muley deer populations are doing fine in cities, but not so well in most of Montana. Blue tongue disease and loss of habitat are harming deer populations. Fish Wild and Parks treats predators differently than ungulates. If populations of wolves are not reduced to “acceptable” levels, the hunting season is increased and new hunting methods are allowed. This includes trapping, increase in numbers of wolves allowed by one hunter to take, silencers, etc. This is not done with deer and elk. FWP and federal trappers do not go out and slaughter a herd of elk or deer with aircraft because hunting targets were not met, they were a threat to cattle or they were too close to my cows. I fear tha t Griz will be treated as wolves since 600 bears is our target population to keep the Griz off the ESA and this is our target. We will allow for hunting, bear baiting, etc to keep bear at this population at all costs. Delisting of wolves has not gone so well in Wyoming and the mid-west, at least according to federal judges. Federal funding for Grizzly population surveys will stop after 5 years. Will it then be left up to the states to monitor Grizzly Bear? Is there a funding mandate placed on the states to monitor the Grizzly populations? Economics: There has been new economic information on the value of Grizzly bears for tourism. The study showed that Grizzly bear are an economic driver for tourism. Hunting Griz will hopefully create tourism boycotts. Disease: Due to the small population of grizzly bear, islands of bear habitat and global warming, it is possible that the Yellowstone population could be decimated with a disease that the bear would never recover from. 700 bear are too small of a population for long term survival. How does delisting now respond to issues of disease? Isolated populations: Unfortunately politics punched a hole in the ESA when Senator Testor put a rider on wolf delisting. Up until that point, whole populations needed to be at least stable growing throughout species historic range before delisting could happen. The delisting of pockets of Griz when the bear are not established in their historic range is shortsighted. How are the bear doing in the Cabinet Yaak. How will the bear do around Glacier long term when one looks at human development? What is the acceptable population numbers and habitat that the USFWS has determined for Griz to be delisted in the lower 48 states? Look at all of the human growth in the Madison, Gallatin and Paradise , Boulder and Redlodge Valleys. How does this growth allow for Griz to re-inhabit historic ranges? Food sources: The diet of Griz around Yellowstone NP has changed drastically. The bear have lost whitebark pine, cutthroat trout and moths as a major high nutrient food source. As a result their diet has needed to change. How will delisting these bear now protect future bear generations if they lose other food sources? Is there enough habitat and human tolerance for Griz that will allow for Griz to use new habitat for new food sources? How will delisting effect Griz if the bear take cattle on federal grazing leases? New threats: The new threats come from the same old major threat-humans. Without the ESA protections it will be difficult for policies to be put in place quickly to protect Griz. Look how long it has taken to establish viable Bull trout critical habitat? Habitat loss: Growth around national parks and wilderness areas are the fastest growing areas in the west. People want to live in nice places. Unfortunately griz do not have the latitude or ability to move to many places in the west and survive. They have been pushed in the past to places that people did not want to live. They were plains animals. I have included maps of population growth in the Flathead from 1970-2010 and these maps clearly show habitat loss. If federal lands are transferred to the states as some people want, how will this political action affect the viability of Griz?? Without ESA protections many shortsighted land management decisions will be made that will reduce habitat sui table for Grizzly bear. In the past even in the 1970s when food sources were bad for Grizzly bear, they could go down in the valleys and find food. With the conversion of the vallevs to housing and ranching the bear have lost this source of food in times of drought. As global warming continues. where is the habitat	FWS-R6-ES-2016-0042-5183-A1.docx	

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		What the conversion of the valleys to housing and ranching the bear have lost the source of food in times of drought. No greater farming continues, there is the need to set aside b the states to accommodate this top predator? I am amazed at the growth of humans and change o f wildlife habitat to human dominated habitat from highway building, human housing development, roads from log ging, weeds and the shorter winters in Idaho, Montana and Wyoming since the 1970s. When I project this growth forward, I really do not know where the griz will live in the future. Look at the map of the Flathead in 1970 and then 2010. The growth is impossible to ignore. This growth has happened throughout Griz habitat. The bear was listed in 1975 and look at the loss of habitat and how Montana finally was forced to stop hunting the bear in 1980? Now you want to leave it to the states to manage Grizzly bear ? Griz are not deer. Global warming: From 1978- 2000 there were over 30 more frost free days in Montana. It does not get down to -50F anymore. Forest fires and lower and less snow pack will be more common. How does delisting the bear now protect them in the future as their present habitat will be unrecognizable in 20-30 years? Hunting: There is no rational reason the hunt Griz again. I have hunted in the past and do support hunting. But not for Grizzly bear. They reproduce too slowly and there are too many human caused threats present and unforeseen future ones to allow for the states to hunt them. Look at Wyoming â€™s plan to only allow wolves in a small part of the state. Look at Idaho that says they are doing elk studies in the Frank Church River of no Return Wilderness with helicopters and it turns out it was only to hunt wolves? Look at Montana where wolf hunting rules are being relaxed and new manners of killing them is looked at ev ery legislative session? I do not trust these states to wisely manage Griz. Past hunting got the bear listed. While the public in general wants top predators on the landscape, local ranchers and hunters do not like top predators. Ranchers with federal grazing leases hate predators and will shoot more of them without federal protections. What will happen when a hunter wounds a bear and the bear gets pissed and starts killing people? Bear are not deer. There is no reason to hunt bear. It will encourage poaching, allow for ranchers and farmers to shoot bear on sight and unfortunately lead to the bearâ€™s eminent demise. Please do the right thing for future generations and stop the delisting of Grizzly bear until there are stable populations in the Frank Church and Selway-Bitterroot Wilderness Areas, the CM Russel, Washington, Idaho, Oregon and California(the bear is on their state flag). As you know top predators improve habitat for all species. Including humans. The piecemeal approach to Griz delisting is short sighted and will fail the species that the ESA was designed to help. Thanks for your time , Stephen Braun PO Box 5614 Whitefish, MT		
The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Â Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior	Miscellaneous	RECEIVED To: Public Comments Processing, MAY 0 9 Zum Attn: Docket No. FWS-R6-ES-2016-0042, _ & Div. ofPol1cy. PÂl'Â£ U.S. Fish and Wildlife Service, MS: BPHC, MGMTÂ-P'Â°gÂ°" 5275 Leesburg Pike, Falls Church, VA 22041-3803 From: Harry T. Saurman P.O. Box 794 Troy, MT. 59935 Re: Comments to FWS re delisting the Grizzly Date Submitted: 5/4/16 The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS. HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for deâ€™listing. In my opinion, HSUS is again correct. Look at the brutal treatment and killing contests involving wolves in these same three states. It is ugly and awful to be a Montanan who treasures wildlife and yet state governments want to use them for "sport" and as a profit center. FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees lit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS says, the agency says it looks forward to hearing from the public about delisting. The truth is, the public has already made its views known; A recent national poll on behalf ofthe Humane Society of the United States and Wyoming Wildlife Advocates shows the following:55% of voters oppose the FWS proposal to delist grizzly bears in the Greater	FWS-R6-ES-2016-0042-	

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to the FWS delisting proposal. Native News Online .Net also reported that the Å Oglala Sioux Tribe presented an eightâ€”page resolution that details spiritual, scientific, political, and environmental objections to delisting. Å	Miscellaneous	Humane Society of the United States and Wyoming Wildlife Advocates shows the following:55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eightâ€”page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and lish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations." Like so many groups and interested members of the general public, I do NOT believe the F\NS has the best interests of the public or OUR wildlife in mind with this proposal. It is simply yet another method of exploitation disguised as wildlife "management". I won't fall for il: any longer!! PLEASE DO NOT DEI.IST THE GRIZZLY BEAR! Submitted by, Har T. Saurman	5675-A1.pdf	
More bears will promote ecotourism and better economies in the region.	Miscellaneous	I Ms Donna Snow .Å· No. FMS â€”R[, , -1-Eg - WW2 wlg 2Â”*(Å¸â€” 00 +2. albvv-<S QAMJEAfMo +* WE llnhfugvdmriwwxlth {YLQWLM Nu"P CJJVM P MI6â€” ppâ€”r' liybkIhr miflztfwqk iw _2 J; Z.	FWS-R6-ES-2016-0042-5679-A1.pdf	

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They are also sacred to North American tribes, fifty of whom are opposed to delisting.	Miscellaneous	U.S. Fish and Wildlife Service IVlountm-Prairie Region I â€ƒ > J -1*-2. ` _ _ â€™ Yellowstone Grizzly Bear Â«â€™~"*Â--Qu} '.â€™™ .\ . P l t' P d D l' t' Â· Â· OpIï 8 IOIâ€™~I l'OpoS9 9 IS Ing ,. Comment Form The U.S. Fish and Wildlife Service (Service) is accepting written comments on the Greater Yellowstone Ecosystem grizzly bear population proposed delisting rule, the draft supplement to the 1993 Grizzly Bear Recovery Plan for the Yellowstone grizzly bear population and the draft 2016 Conservation Strategy. The recovery of the Yellowstone grizzly bear population serves as a remarkable Endangered Species Act success story. It is the result of strong partnerships among the Service, federal and state agencies, tribes and other partners. Yellowstone grizzly bear numbers have rebounded from as few as 136 bears when listed in 1975 to an estimated population of more than 700 today. There is now a sustainable and resilient population that occupies the entire available habitat. The population is at or near the â€,~COSyStâ,~IT'lâ€™™S IOIâ€™™Ig-(â,,~I"ITI Caffylflg Capailty. To comment, return this form by mail to the address on the reverse side. Fold this form on the lines with the retum address showing, tape it closed, affix a stamp, and mail. You may attach additional pages. Comments may also be submitted for Docket No. FWS-R6-â,,~Sâ€™”20I6ââ€™”O042 via www.regulations.gov. For your comments to be the most effective, the Service suggests the following guidelines: rñ Â·) â€ƒ Be specific. Clive defined reasons, not broad statements, or opinions. A` â€ƒ Share sitespecific observations, data, or knowledge. I â€ƒ Detail important environmental and community factors. Div. Â· . Â· . BE timely. Comments are requested by May to, 2016 to be considered in the final rule. 1 1tL,:â€™lf11Is& â€ƒ This is not a voting process. Petition signatures typically only express an opinion, which is not helpful in our decision making. II . You may insert additional pages. â€™ Please provide your contact information. Before including your address, phone number, eÃ-mali address, or other personal identifying information In your comment, you should be aware _ that your entire comment -â€™Including your personal identifying InformatiOnâ€™”may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. ORG NIZATION /6 2 / MAILI ADDR}; S ""Q 90 6 X CIlv, STATE ZIP CODEThank you for your interest and participation!~ . Ig:- "â€™Ä»E~ED MAY 12 2 4Å» E' 4 v. Å»g.,~Å»,.Ä» W64 Q_. mj ____ .g ,_ _ _____ Ä» I,-â€™”â€™”â€™”-.-â€™”-.â€™”.â€™”.â€™”. _ .214 ?-'Â·Â·Â· * YJ. 'Â·Â· Q 4 ;__f_] 1 2 Å»L Å»Ä» J 1 J .., Â·.Â·Ç 4 ~â€™”_-{j.a.?Â·.*' , Çb; L wm {44 4f 4.. f.; } _____lÂ·ç'.Â·r4 { J!. 1 / 4 â€™”_ J: 61.4. Å» ___,_____ * K,. Ã©LQ.i..% 0 . ~ H J. 1, -l_ 1 â€™” pl j- Â· J W. _ r II . xx ."â€™”C7"" /4 ef g. 1 ___ L. 1 e,.. JJ .. f ,, -.u I/I :.....- Â· fj..___ db. N :76 QHFQA _4 id l *1 p E lr _; Lazgdgl 6 "" â€™™ #	FWS-R6-ES-2016-0042-5686-A1.pdf	
The public highly values grizzly bears. In 2015, Yellowstone received 4.1 million visits and Grand Teton had 4.6 million contributing \$890 million to Wyoming’s gateway communities, and \$1.1 billion to Wyoming’s overall economy. These figures greatly outweigh revenues generated by either Wyoming’s livestock or hunting industries. Grizzly bears, in the human economy, are worth far more alive than dead.	Miscellaneous	We, the undersigned scientiiic experts, are writing to express our strong opposition to the pmposal by the “U.S. Fish and Wildlife Service (FWS) to remove the grizzly bears (<i>Ursus arctos horribilir</i>) living in the Greater Yellowstone Ecosystem (GYE) from protection as a threatened species under the Endangered Species Act (ESA),’ leading to Northern Rockies states’s commencement of an imsustainable trophy-hnntingz season on GYE grizzly bears, which continue to be imperiled by resomeee declines, including habitat and dietary staple losses. GYE grizzly bears are not recovered. Before 1800, approximately 50,000 grizzly bea.rs roamed the lower 48 states between Canada and Mexico} After European settlement, humans heavily persecuted grizzly bears to near eradication} Today, wild grizzly bears number fewer than 1,700 individuals in the lower 48 statess â€™” while FWS claims that there are 700 grizzly bears in the GYE,Â° this is a contested figure.? Grimly bears have not recovered across a signincant portion of their range, and thus they are not recovered and should not be delisted. Trophy hunting grizzly bears would further jeopardize their persistence. Pursuant to a tri-state memo, Northem Rockies states have allocated bears for the purposes of "discretionary mortality available for regulated harvest" within the DemogÃ-graphic Monitoring Area (DMA) as follows: Wyoming would authorize hunting for 58% of the bear quota, Montana 34% and Idaho 8%.9 The number of grizzly bears states will permit for trophy hunting is unknown. While Wyoming has issued a draft grizzly bear management plan, it would inadequately protect GYE grizzly beats in the absence of a federal ESA listing because it gives broad discretion to the Wyoming Game Commission to set the manner of take (e.g., baiting, hounding, trapping, stalking), bag limits, seasons, sex ratios and age limits for grizzly bear hunting.'Â° How Idaho or Montana will permit grizzly bear hunting is also currently unknown. Under this veil of uncertainty, the FWS is rushing to close the public comment period (ignoring reasonable requests for a deadline extension justified by the voluminous documents released by FWS) in order to rapidly delist grizzly bears for what appear to be more political than scientiific reasons. Such action conflicts with the ESA requirement to make listing decisions solely on the basis ofthe best scientific evidence available and to seek meaningful public comment on listing decisions. Grizzly hears face multiple threats to persistence including the loss of their primary food resotuces. Currently, whitebark pine seeds, native cutthroat trout, huckleberries, army cutworm moths, elk and bison are either declining and/or are expected to decline in the foreseeabe iitture as a result of habitat loss, climate change, drought, invasive species and other anthropogenic causes. Traditionally, whitebark pine seeds have provided a core dietary staple for g1Ã-izzly bears. Yet, the whitebark pine, a species the FW S agrees warrants federal protection, is in decline because of a variety of problems)! Another key source ofsustenance, the cutthroat trout, has stopped spawning in all tributaries of Yellowstone Lake}2 Army cutworm moths, a staple for grizzly bears since the late 1990â€™™s, could likely disappear because they nectar on tundra flowers, which are highly vulnerable to global warming. Added to these threats to the sustainability ofthe GYE grizzly bear population, Yellowstoneâ€™™s Jackson and Northern Range elk herds and its Central Range bison herd are all in decline); Because of warming summer temperatures and drought severity since 2005,M berries have become largely unavailable to grizzly bears. These food failuresâ€™”whitebark pine, cutthroat trout, huckleberriesâ€™”have caused grizzly bears to switch to a more meat-based diet, including domestic livestock. As a result, bears have been in conflict with humans, leading to record numbers of lethal actions taken against them." 'l'his additive mortality harms their persistence.'Â° Furthermore, biologists have noted that grizzly bear cub production has declined"â€™” perhaps because of more predation on cubs by wolves and other bears as a result of their new dependence upon a meat-based diet., which puts them into greater proximity with other predators, resulting in deadly strife on grizzly bear cubs. The loss of flora and fauna upon which grizzly bears depend in Yellowstone and Grand Teton national parks in part explains why grizzly bears are disappearing in greater numbers from park lands to national forests lands which are grazed by	FWS-R6-ES-2016-0042-5687-A1.pdf	

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The grizzly bear is a major driver of the Northern Rocky Economy. There are very few places in this world where you can go and catch a glimpse of this great bear. This is why we must protect the bear. People travel all over the world to come to communities across the Northern Rockies.	Miscellaneous	J! if C`Â· qemiuq iw _one @56* QW __ .. .... :15: .. __c  cs ww  { QM 3  * 6 Cu  r- â€™ `Â·;=, Â· 0 0 fs Oc `jflIÃ@wnum Cv ....ad bg +0umi lywk} pmt; Em; A1-gmmqzz? gnazj l jj Cxe_. i_ __ fu igmye gc beU. .... gf fr>@ _; ` A ; F - qA,) _TL7 <><.Y*~â€™ Â¤]O,`J_~L:n,_\IÂ\$2;Â¤;~:nlA.@;P&x;Â¤;}Â·;L;&L-Â·Â¤Â·yÂ¤,,_;.l;;Â¤..,% ..._j `.. gÂ· ;]IAÂ¤1f`]~\ Â· 5; _ iy _____ ____ _____. i ... 9*; - - --â€™â€™â€™ ~	FWS-R6-ES-2016-0042-1226-A1.pdf	
Grizzly bears in the GYE have reached great enough population numbers to no longer meet the definition of an endangered or threatened species under the Endangered Species Act.	Population parameters	The Fremont County (Idaho) Farm Bureau (FCFB) strongly supports Grizzly bear delisting under Docket No. FWS-R6-ES-2016-0042. The FCFB is one of 37 county Farm Bureaus comprising the Idaho Farm Bureau Federation, whose combined membership is over 73,400 member families throughout the state. FCFB members live on the eastern edge of the Greater Yellowstone Ecosystem (GYE) and are directly impacted by Grizzly bears and the regulations surrounding them. I agree with the Federal Register announcement of March 11; 2016, Grizzly bears in the GYE have reached great enough population numbers to no longer meet the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). Perthe annou tripled in size. Local ofhcials say the range is fully occupied and young or transient bears encounter difficulty in establishing their own home ranges. The states of Wyoming, Idaho and Montana requested delisting the GYE Grizzly bear population and are working on post-delisting management plans. FCFB supports these efforts as well as the delisting of the GYE Grizzly bear population. ` Thank you for the opportunity to express my support for Docket No. FWSâ€™R6-ES-2016- 042. I Li 76 ,7@ Cjghi p lÂ°	FWS-R6-ES-2016-0042-5658-A1.pdf	

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The grizzly reproduces slowly and an error now may be difficult to correct via normal reproduction in the wild.	Population parameters	. A- ex, Public Comments Processing Attn: Docket No. FWS-R6â€˜ES-2015-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. 'Tlâ€™~l@2â€™™E: [5 /\â€™~BsÂxi.uÂ-CQ_-Z Nm Âšjâ€™Z.. "LL;j . jg] ggg 'P><Âc2S1' <bl:â€™~Tl:\<E- Ecogsg AN; clout; esswÃ©gg jggit E:] @ " Lt. S. ;;;,tts>t_ÂcF.Âc; f[(Â£â€™~i-.. f' f@ 'B=-=Â=-â€™=â€™” Â©Â©Â©iz. gl \$571 l~Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. }â€™™ÂcEPÂcSÂ£,Qgiu 'I D E.-- br.l' [Z 4;-[5 glu ZLLV gÃ©glg vu ng [Hi guicrnyn} gwrluguygi my mg MO 6 Z; g gy we cr. CONrjÂ£.cTc,O Âxlr ,l;{&\$;}1l;[EM [C gow jig G5 egg/cg;), Ai-Fâ€™~O A ; ?0@vcNrzvM <rF gÃ©ggf gggc/=.t> gf ALwvJE0 IQ ru gz 5- scw/lj â€™” E rrrgggqq ;. 5 r,gg,J Hm L c U; Yifi Q ([546 g Q . gcgccica ll QE BRC-NAA/Â- Nâ,-7'~Public Comments Processing Attn: Docket No. FWS-R6-ESâ€™”2016-0042 U.S. Fish and Wildlife Service VIS:BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. .. _ j l 74/ /114 4iAl AÃ©Ã© Ka, wz. @23- we /44224 x4â€™™ T1; ..1 1. ul, Â-Â- /&Z6Dq zu .4 11 JL.;} A1 Â»Â-Â- AJ r . # i d'/4 7 Âc , _ 1 / / Â-Â-â€™™ Â- - l . {J Qâ-. AQAM.4 _Â-Â- rz, ro i,l v JMX . â€™™ â€™” ;. new ,.. r' .4*:;. (H A _ M l if In;Â-Â- â€™™ â€™” Â© mz /O l Âx/me H,/1... F A./n. Al _ 1 â€™c,Â-Â- , , zi ,Â-Â- mi;; _ ' . rd;? _ Â-Â- Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. l " â€™” r r l l â€™” *4*%/ 14 llÂ- A Â- 5 ' l . , â€™” Â» G, r ' ipidrlI mobil E r' â€™” . A l lj 'YL V pi zazzF, "" JI ...L.',Â-Â-:id . Lia @% _ _ rw/lll' *1 / P lÃ© gtzÃ©gtzl~iÂ-` iâ€™œ` â€™” `â€™”Â- ..â€™”â€™”â€™” iv Public Comments Processing Attn: Docket No. FWS-R6-ES-2016-0042 U.S. Fish and Wildlife SenrlceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Servlceâ€™™s proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. l lgm gm {he viog /\L ÂxL www Aer 0 t/kskg 5 ok @ ul/All Eg Â- -=-'[Avi/\ Qkggg gm; Qwvxeg ln a Ol `kfk â€™” LAAAQY  =- AA \A( Â- ;* â€™c â€™™ ' A V\ Q~` Q' Q .i.31,_T PublIc Comments Processing Attn: Docket No. FWSâ€™”R6-ES-2016-0042 U.S. Fish and Wildlife ServiceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. ggnii-L r' l Â- _ Â- Âx J â€™câ€™”l V l l i Public Comments Processing Q) Attn: Docket No. FWS-R6-ES-2016-0042 *lâ,-'H' Bâ€™™Bl09.Y` U.S. Fish and Wildlife Service . szvs Leesburg Pike Gp ze mw. M T" Falls Church, VA 22041-3803 (C; â€™”i 7 l S' _ iq Please accept my following comments on Fish and Wildlife Serviceâ€™”s proposal to remove Endangered qcb _ . Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. lab? kv BB? glg? cov ygiew `Fâ€™™ 15 QE dlweoc Qvizzlrf lOQ.:c;/ g remgv-ed EgÃ©kgiig gg Sgqddg Ad". {Lrg; ggalwvc m ag still urcl -â€™”- vwgx. SjyglIhf igâ€™œJ wevvc xi lg Q; ..~\0v~Q :v~Â-\.l.P<.Jvâ€™™\`2r/xlj apt/{ om};. jg â€™~B\<JÂx=->%v h lmhifaljhi kaeav ygcwg ew [-eg @PE\glvÂxÂxÂxA Â- Pkifgg mgcwggrdcmyg â€™”zÂ-Â-Â-~.dL 2-No Lo ugllggitq gm c.Âx 0 vypm~` _ s -â€™” . 3% Public Comments Processing Attn: Docket No. FWS-R6â€™”E5-2016-0042 U.S. Fish and Wildlife SenriceMS: BPHC 5275 Leesburg Pike Falls Church, VA 22041-3803 Please accept my following comments on Fish and Wildlife Service's proposal to remove Endangered Species Act protections for the Greater Yellowstone Ecosystem grizzly bear population. â€™” 5 . 1 l â€™c` Â- . gÃ© _ n : 1 - 1 a V5lâ€™c K l O Â- . E . Â- . nv â€™” 0 & AAA O1 Â- â€™” â€™” ' lazaxs l a 4 . 1 . gawue- 1 l . &6Âx4Y`vul â€™”iÂx`Fiofl	FWS-R6-ES-2016-0042-5663-A1.pdf	
Grizzlies are one of the slowest reproducing mammals and the reproduction rate is in jeopardy due to the these limited food resources. Females can only breed every three years and then the success of their cub reaching adulthood is stacked against them.	Population parameters	I am writing in opposition to the delisting of the Yellowstone grizzly bear. I agree with Jane Goodall, Edward O. Wilson, Ted Turner, Mike Finley (former Yellowstone Superintendent), George Schaller, grizzly bear expert Doug Peacock, whitebark pine specialist Dr. Jesse Logan, and Dr. David Matson (retired Yellowstone grizzly bear biologist) that it is premature to consider delisting. The decline of their food sources, genetic isolation, and climate change are just a few issues threatening the grizzly bear. And the thought of the states around Yellowstone conducting a trophy hunt is just appalling and inappropriate. With the limited food resources like the pine nut from the whitebark pine tree and the Yellowstone cutthroat trout, the bears are leaving the park to forage. Grizzlies are one of the slowest reproducing mammals and the reproduction rate is in jeopardy due to the these limited food resources. Females can only breed every three years and then the success of their cub reaching adulthood is stacked against them. When the whitebark pine was plentiful, a grizzly sow with cubs would have plenty of food at a high elevation. Now with climate change decimating the whitebark pine tree, the grizzly sow and cubs have to forage in lower elevations competing for food resources with male grizzlies who kill cubs. With bears transitioning to eating more meat, it is even more important to have habitat around the park for the bears and the Yellowstone bison. The Yellowstone grizzlies are an isolated population. Until there is a plan to create corridors and connectivity with the Northern Rockies Continental Divide Ecosystem population, it is premature to delist the bear. It is imperative that there is connectivity. There is potential north of Yellowstone to connect to the Bob Marshall Complex. And also to the west along the Continental Divide to the Salmon/Selway/Bitterroot Complex. Instead of spending money on delisting we should be focusing on wildlife overpasses and underpasses and the importance of connecting these wild places. Grizzlies need to be reintroduced with full endangered species protection to the Salmon/Selway/Bitterroot Complex to help jump start this connectivity and genetic diversity. The April 20, 2016 NOVA special Wild Ways addressed the importance of connectivity. The preeminent biologist and Pulitzer prize winning author Edward O. Wilson has a new book call Half-Earth suggesting that we set aside half the earth in order to prevent the mass extinction that is underway. The scientific community realizes it is essential for the long term success of species to have genetic diversity and connectivity. The economic opportunities of keeping the grizzly bear protected far out way delisting and the opportunity for states to implement a hunt. The wor d's most famous grizzly bear #399 dens outside ofYellowstone in Wyoming. She will be shot if there is a hunt. There will be global outcry like Cecil the Lion. And the famous grizzly Scarface was just shot outside of Yellowstone. In April 2016, a l\lontana Federal Judge issued an order last week reversing the U.S. Fish and Wildlife Service's decision to not list the wolverine. This was due to them not considering the impacts of climate change. There will be lawsuits for the same reason if you delist the grizzly bear. The United States military considers global warming a factor in all it's decisions, why doesn't the U.S. Fish and Wildlife Service. The agency need an overhaul using the best science available and also having it peer reviewed and available to the public. Instead of wasting all that taxpayer money on lawsuits. Let's invest in corridors, education, tourism, reintroduction into the Salmon/Selway/Bitterroot Complex. How can we delist the grizzly bear with these threats? The threat of climate of change is a huge unknown even for our own species. The loss of habitat, biodiversity, connectivity, and food resources threaten the safety and security of the grizzly bear for future generations. Please do not delist the grizzly bean	FWS-R6-ES-2016-0042-5145-A1.pdf	

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The grizzly is a slow to propagate species. A female grizzly bear only reproduces one time during her first ten years. Even a small rate of female grizzly mortality has widespread negative effects on bears. It is difficult to tell a female grizzly from a male. If hunting the bears is allowed there is no way to protect females. Sows with cubs do not always stand next to their cubs, so hunters will shoot sows with cubs either by mistake or on purpose. Cubs stay with their mothers for at least the first two years of their lives	Population parameters	YP ZIA@science for a changing world Fomxcmtc Bumvion of Noam AMuucAu Burns David J. Mattson P.O. Box 5614, BLD 24 Southwest Biological Science Center Flagstaff, AZ 86011-5614 Colorado Plateau Research Station Phone: 928-556-7466 x 245 Northern Arizona University Email: David Mattson@usgs.gov Predation on Land-Dwelling Prey Even though all three North American bear species can be predators, the grizzly bear is more likely to kill larger terrestrial prey; either because of opportunity (compared to polar bears) or aptitude (compared to black bears). An adult grizzly is large enough to kill most adult ungulates, and equipped with claws, teeth, and power sufficient to deliver a killing blow. I\leat's ready digestibility also means that the typical bear will reap considerable rewards from predation. Bears locate larger land-dwelling prey, such as deer, elk, and moose, by a variety of methods and with varied intent. A certain number of encounters with potential prey are strictly by chance, apparently without deliberate stalk or search. This is typified by one incident where two grizzlies approached some elk behind a blind rise, without either species being aware of the other's presence. However, as soon as the elk came into sight, one of the bears lunged after them, but without success. This unfruitful result probably characterizes the vast majority of these chance encounters, however there are enough recorded kills in rolling terrain or otherwise visually opaque conditions to suggest occasional success under similar circumstances. On the other hand, the majority of observations suggest that both black and grizzly bears most often encounter their prey either after a deliberate search, characterized by movement in the direction of the hoped-for kill, or, with even greater forethought, by putting themselves in areas with concentrations of vulnerable prey. Elk and caribou calving grounds or traditional caribou river crossings are good examples of such areas where, either because of extreme young age, the preoccupations of birth, or the mass confusion of swimming animals, otherwise elusive ungulates become easy prey. This is most dramatically borne out by several graphic descriptions of observers such as Adolf I\Iurie, Harry Reynolds, Kerry Gunther, and Steve and I\Iarilyn French, of contemporaneous pursuits, kills, and confrontations by grizzlies concentrated on calving grounds in Alaska and Wyoming. Bears clearly use all of their senses to track down prey. However, most observations suggest a prominent role for olfactory and audio cues. Bears have often been observed following scent trails associated with potential prey, sometimes for miles, or more convincingly, been seen killing calves at the culmination of a complex search mostly with nose to the ground. There are other phenomena that argue anecdotally for the prominence of hearing in tracking down meat. A number of hunters bugling for elk have surprised themselves by soliciting the apparently predatory interest of a grizzly bear. Concordantly, there is a consistently observed tendency world-wide for increased bear predation on both bull elk and bull moose during their fall ruts. Bears also seem to be attracted to the sound of gun-fire during the hunting season, one can only suppose with the intent of scavenging the gut pile and other remains of a hunter's kill. Although this likely orientation towards sound has not been conclusively demonstrated, it remains an intriguing possibility worthy of further study. Bears can chase down prey in open country, and are more successful at this tactic after separating a young calf from a cow-calf herd. Capture usually occurs after the pursuing bear cuts the corner on a fleeing calf that has been foolish enough to turn. However, most successful bear predations are not the result of long pursuits, but rather the result of a short-range rush either from ambush or after a stalk. Given the relative slowness of bears, at least compared to most wild ungulates, there is a distanceForaging Behavior ofBears . Mattson 2 at which this rush is more likely to be successful or, if not, then terminated. A number of records by different observers in different areas suggest that this "optimal" distance is around 20-50 m. Without the aid of mitigating conditions or tactics, it would be difficult for a bear to get this close to a reasonably alert and healthy ungulate, and so it should be no surprise that most kills are associated either with cover, conditions that hinder prey mobility, or the afflictions of exhaustion, disease, or raging sexual hormones in their prey. Thus, 5-9-16 To whom this does concern, Please accept these comments on the premature Grizzly bear delisting that is proposed the US-FWS. I am very supportive of delisting Grizzly bears if the population, habitat and food sources are secure to allow for populations to reach historic levels and fill historic habitat . As it is now the USFWS and states are satisfied if the population is well below the historic population of 50.000 Grizzly bears. The listing is unwarranted because the population to be unlisted is small and does not include the historic range of the bears. The piecemeal delisting in one small area of the historic range will not truly recover the species. Griz should not be delisted around Yellowstone National Park when Grizzly bear are not present or struggles to survive in 98% of their historic range. Canada has for many years been looked at as a genetic supplier for many species into the US. The population of Grizzly in Canada is also decreasing due to loss of habitat , roads, oil and gas development, mining and hunting, housing, ranching, farming, etc. These are the same pressures and demands that the US puts on historic Grizzly bear habitat. This delisting will create an island with delisted bear that will become inbred as wildlife corridors have not been determined and protected from fragmentation, road building and human growth in valleys as is easily seen in the included maps. Until hard management strategies are in place to limit human activity (hunting of Grizzly, road building, climate change, trash storage, grazing, weeds, logging, human development of valleys and a basic understanding that Grizzly bear do not have other places to live) any delisting will be the end of this top predator . People need to understand that they live in Grizzly bear habitat out of choice. Grizzly bear do not have this choice of where to live . People need to stop being so self-centered and become educated on how people must change their behaviors to accommodate the needs of Grizzly bear to survive in the long term. The USFWS needs to take on this challenge to educate people on the needs of Grizzly bears and actions that are required to enhance and enlarge places that grizzly bear can live in safety . Hunting: The hunting of Grizzly bear is unacceptable for any reason. The Grizzly bear need to have the same protections as Bald eagles where the eagles are delisted and people cannot hunt them. The states protection of Grizzly bear did not work in the past and will not work in the future without mandates from the USFWS that any future delisting will not allow for hunting until the population reestablishes historic populations of 50,000. A population of 600 Griz is too small to be a viable population. I doubt that the USFWS would consider at a population of 600 humans in the greater Yellowstone as viable if there were only 1200 ,+/-more humans in the lower 48 states. The reason a hunting ban is imperative is due to listening to a Montana Fish Wildlife and Parks employee saying â€œthat deer populations are increasing in Montana and we hunt them. And the Grizzly bear will do fine hunting them too .â€œ The mindset that Grizzly bear are like deer is ludicrous. Also whitetail and muley deer populations are doing fine in cities, but not so well in most of Montana. Blue tongue disease and loss of habitat are harming deer populations. Fish Wild and Parks treats predators differently than ungulates. If populations of wolves are not reduced to â€œacceptableâ€œ levels, the hunting season is increased and new hunting methods are allowed. This includes trapping, increase in numbers of wolves allowed by one hunter to take, silencers, etc. This is not done with deer and elk. FWP and federal trappers do not go out and slaughter a herd of elk or deer with aircraft because hunting targets were not met, they were a threat to cattle or they were too close to my cows. I fear tha t Griz will be treated as wolves since 600 bears is our target population to keep the Griz off the ESA and this is our target. We will allow for hunting, bear baiting, etc to keep bear at this population at all costs. Delisting of wolves has not gone so well in Wyoming and the mid-west, at least according to federal judges. Federal funding for Grizzly population surveys will stop after 5 years. Will it then be left up to the states to monitor Grizzly Bear? Is there a funding mandate placed on the states to monitor the Grizzly populations? Economics: There has been new economic information on the value of Grizzly bears for tourism. The study showed that Grizzly bear are an economic driver for tourism	FWS-R6-ES-2016-0042-0513-A3.pdf	
The states protection of Grizzly bear did not work in the past and will not work in the future without mandates from the USFWS that any future delisting will not allow for hunting until the population reestablishes historic populations of 50,000. A population of 600 Griz is too small to be a viable population.	Population parameters	delisting Grizzly bears if the population, habitat and food sources are secure to allow for populations to reach historic levels and fill historic habitat . As it is now the USFWS and states are satisfied if the population is well below the historic population of 50.000 Grizzly bears. The listing is unwarranted because the population to be unlisted is small and does not include the historic range of the bears. The piecemeal delisting in one small area of the historic range will not truly recover the species. Griz should not be delisted around Yellowstone National Park when Grizzly bear are not present or struggles to survive in 98% of their historic range. Canada has for many years been looked at as a genetic supplier for many species into the US. The population of Grizzly in Canada is also decreasing due to loss of habitat , roads, oil and gas development, mining and hunting, housing, ranching, farming, etc. These are the same pressures and demands that the US puts on historic Grizzly bear habitat. This delisting will create an island with delisted bear that will become inbred as wildlife corridors have not been determined and protected from fragmentation, road building and human growth in valleys as is easily seen in the included maps. Until hard management strategies are in place to limit human activity (hunting of Grizzly, road building, climate change, trash storage, grazing, weeds, logging, human development of valleys and a basic understanding that Grizzly bear do not have other places to live) any delisting will be the end of this top predator . People need to understand that they live in Grizzly bear habitat out of choice. Grizzly bear do not have this choice of where to live . People need to stop being so self-centered and become educated on how people must change their behaviors to accommodate the needs of Grizzly bear to survive in the long term. The USFWS needs to take on this challenge to educate people on the needs of Grizzly bears and actions that are required to enhance and enlarge places that grizzly bear can live in safety . Hunting: The hunting of Grizzly bear is unacceptable for any reason. The Grizzly bear need to have the same protections as Bald eagles where the eagles are delisted and people cannot hunt them. The states protection of Grizzly bear did not work in the past and will not work in the future without mandates from the USFWS that any future delisting will not allow for hunting until the population reestablishes historic populations of 50,000. A population of 600 Griz is too small to be a viable population. I doubt that the USFWS would consider at a population of 600 humans in the greater Yellowstone as viable if there were only 1200 ,+/-more humans in the lower 48 states. The reason a hunting ban is imperative is due to listening to a Montana Fish Wildlife and Parks employee saying â€œthat deer populations are increasing in Montana and we hunt them. And the Grizzly bear will do fine hunting them too .â€œ The mindset that Grizzly bear are like deer is ludicrous. Also whitetail and muley deer populations are doing fine in cities, but not so well in most of Montana. Blue tongue disease and loss of habitat are harming deer populations. Fish Wild and Parks treats predators differently than ungulates. If populations of wolves are not reduced to â€œacceptableâ€œ levels, the hunting season is increased and new hunting methods are allowed. This includes trapping, increase in numbers of wolves allowed by one hunter to take, silencers, etc. This is not done with deer and elk. FWP and federal trappers do not go out and slaughter a herd of elk or deer with aircraft because hunting targets were not met, they were a threat to cattle or they were too close to my cows. I fear tha t Griz will be treated as wolves since 600 bears is our target population to keep the Griz off the ESA and this is our target. We will allow for hunting, bear baiting, etc to keep bear at this population at all costs. Delisting of wolves has not gone so well in Wyoming and the mid-west, at least according to federal judges. Federal funding for Grizzly population surveys will stop after 5 years. Will it then be left up to the states to monitor Grizzly Bear? Is there a funding mandate placed on the states to monitor the Grizzly populations? Economics: There has been new economic information on the value of Grizzly bears for tourism. The study showed that Grizzly bear are an economic driver for tourism	FWS-R6-ES-2016-0042-5183-A1.docx	

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Grizzlies have a small fraction of their original range and should be allowed to expand for healthier ecosystems.	Population parameters	I Ms Donna Snow .Â· No. FMS â€”R[, , -1-Eg - WW2 wlg 2Â** (Â¸â€” 00 +2. albvv-<S QAMJEAFMo +* WE llnhfugvdmriwwxlth {YLQWLM Nu"P CJJVM P MI6â€” ppâ€™r' liybkIhr miflztfwqk iw _2 J; Z.	FWS-R6-ES-2016-0042-5679-A1.pdf	
The continued isolation of the grizzlies in the GYA highlights the fact that, while the number of bears in the GYA has increased from 136 individuals in 1975 to over 700 bears today, the grizzly population has hardly "recoveredâ€œ in historical terms, insofar as the species continues to occupy only about 2% of its former range in the lower 48 states.	Population parameters	This letter concerns the proposal of your agency, issued on March 1 1, 2016, to remove the grizzly bear population in the Greater Yellowstone Area ("GYA") from the Federal List of Endangered and Threatened Wildlife. For various reasons discussed below, I ask that this proposal be withdrawn. One ofthe main arguments advanced in support of delisting the grizzly bear population in the GYA is that both the size and range ofthe population have increased significantly since the grizzly bears were listed as endangered in 1975, to the extent that the population can now be considered as "recovered.â€”However, the grizzly population can hardly be considered secure, insofar as this population remains highly vulnerable to the consequences of climate change, as well as to the serious decline in the presence of whitebark pine, an important food source for t 1e bears. Another factor weighing against the proposal to delist the grizzly bear population of the GYA is that the bears remain geographically isolated, with the closest other significant population of grizzly bears being located at Glacier National Park, more than 200 miles to the north. Plans to create corridors that would link these two populations remain at the proposal stage. The continued isolation of the grizzlies inthe GYA highlights tl1e fact that, while the number of bears in the GYA has increased from 136 individuals in 1975 to over 700 bears today, the grizzly population has hardly "recoveredâ€œ in historical tenns, insofar as the species continues to occupy only about 2% of its former range in the lower 48 states. Global climate change and the rapid depletion ofthe earthâ€™s natural resources, as exemplified by the serious water shortages that have emerged in many areas ofthe western U.S., call on us to recognize that humankindâ€™s proper role is as a prudent steward, rather than as an absolute master of the planet. In this spirit, the policies ofthe National Wildlife Service should promote the sharing of larger areas ofthe Rocky Mountain states with the grizzly bear, instead of fostering conditions that will keep the bear effectively confined to a few comers of its once-vast habitat. I appreciate this opportunity to comment on the proposal to delist the grizzly bear population of GYA. As I have tried to explain in this letter, this proposal should not be approved.	FWS-R6-ES-2016-0042-5682-A1.pdf	

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Minimum Viable Population (MVP) -- Meta-Analysis Says the "Magic Number" Is ~ 5,000 Recent conclusions regarding minimum-viable population (MVP) arose from a meta-analysis of the scientific literature spanning the preceding 30 years. The researchers filtered hundreds of studies and selected 141 sources covering 212 unique species whose distribution was skewed toward heavier animals, particularly mammals. With regard to mammals, the median MVP was 3,876. The "bootstrapped 95% confidence bounds" MVP ranged from 2,261 to 5,095. Conclusion: The study-authors state: "... we recommend the upper 95% confidence limit of MVP...." Surely to be on the safe side, the upper bound of that confidence limit -- 5,095 -- should be the starting-point for an adequate population of Yellowstone grizzlies. The current estimated population of about 717 in the Demographic Monitoring Area does not meet that standard. The link below takes you to an article discussing the meta-analysis' findings -- including an interview with the lead author. The second link leads you to the report itself: http://www.americanscientist.org/issues/pub/a-magic-number/ http://coreybradshaw.files.wordpress.com/2011/03/traill-et-al-2007-biol-conserv.pdf	Population parameters	May 10, 2016 Keep the Bears Listed I urge U.S. Fish & Wildlife Service to KEEP the Greater Yellowstone Area (GYA) population of grizzly bears ON the List of Endangered and Threatened Wildlife. Moving bear-management to the states of Idaho, Montana, and Wyoming would be handing over those few bears to entities with a track-record of irresponsibility. Under the states' plans, the grizzlies would lose 2,100,000 acres -- 23% -- of habitat that they currently occupy in the Yellowstone Ecosystem. Even now, state wildlife officials are projecting the need for "discretionary mortality," a euphemism for trophy-hunting. Minimum Viable Population (MVP) -- Meta-Analysis Says the "Magic Number" Is ~ 5,000 Recent conclusions regarding minimum-viable population (MVP) arose from a meta-analysis of the scientific literature spanning the preceding 30 years. The researchers filtered hundreds of studies and selected 141 sources covering 212 unique species whose distribution was skewed toward heavier animals, particularly mammals. With regard to mammals, the median MVP was 3,876. The "bootstrapped 95% confidence bounds" MVP ranged from 2,261 to 5,095. Conclusion: The study-authors state: "... we recommend the upper 95% confidence limit of MVP...." Surely to be on the safe side, the upper bound of that confidence limit -- 5,095 -- should be the starting-point for an adequate population of Yellowstone grizzlies. The current estimated population of about 717 in the Demographic Monitoring Area does not meet that standard. The link below takes you to an article discussing the meta-analysis' findings -- including an interview with the lead author. The second link leads you to the report itself: http://www.americanscientist.org/issues/pub/a-magic-number/ http://coreybradshaw.files.wordpress.com/2011/03/traill-et-al-2007-biol-conserv.pdf Protect Our Investment in the Yellowstone Grizzlies De-listing is unacceptable and contraindicated. We taxpayers have invested too many millions and so many decades saving the Yellowstone grizzlies from extinction. Their population is still inadequate. The indicated direction is to ... 1. Keep the Yellowstone grizzlies listed 2. Encourage their population to rise at least seven-fold 3. Increase their habitat to include the entire Yellowstone Ecosystem 4. Protect their migration corridors Please do the right thing. Keep the grizzly bears listed. Thank you. Marybeth Devlin 6880 SW 27th ST Miami, FL 33155-2916 marybethdevlin@bellsouth.net -- 305 665-1727	FWS-R6-ES-2016-0042-5398-A1.rtf	
Federal funding for Grizzly population surveys will stop after 5 years. Will it then be left up to the states to monitor Grizzly Bear? Is there a funding mandate placed on the states to monitor the Grizzly populations?	Post-delisting monitoring and management	5-9-16 To whom this does concern, Please accept these comments on the premature Grizzly bear delisting that is proposed the USFWS. I am very supportive of delisting Grizzly bears if the population, habitat and food sources are secure to allow for populations to reach historic levels and fill historic habitat . As it is now the USFWS and states are satisfied if the population is well below the historic population of 50.000 Grizzly bears. The listing is unwarranted because the population to be unlisted is small and does not include the historic range of the bears. The piecemeal delisting in one small area of the historic range will not truly recover the species. Griz should not be delisted around Yellowstone National Park when Grizzly bear are not present or struggles to survive in 98% of their historic range. Canada has for many years been looked at as a genetic supplier for many species into the US. The population of Grizzly in Canada is also decreasing due to loss of habitat , roads, oil and gas development, mining and hunting, housing, ranching, farming, etc. These are the same pressures and demands that the US puts on historic Grizzly bear habitat. This delisting will create an island with delisted bear that will become inbred as wildlife corridors have not been determined and protected from fragmentation, road building and human growth in valleys as is easily seen in the included maps. Until hard management strategies are in place to limit human activity (hunting of Grizzly, road building, climate change, trash storage, grazing, weeds, logging, human development of valleys and a basic understanding that Grizzly bear do not have other places to live) any delisting will be the end of this top predator . People need to understand that they live in Grizzly bear habitat out of choice. Grizzly bear do not have this choice of where to live . People need to stop being so self-centered and become educated on how people must change their behaviors to accommodate the needs of Grizzly bear to survive in the long term. The USFWS needs to take on this challenge to educate people on the needs of Grizzly bears and actions that are required to enhance and enlarge places that grizzly bear can live in safety . Hunting: The hunting of Grizzly bear is unacceptable for any reason. The Grizzly bear need to have the same protections as Bald eagles where the eagles are delisted and people cannot hunt them. The states protection of Grizzly bear did not work in the past and will not work in the future without mandates from the USFWS that any future delisting will not allow for hunting until the population reestablishes historic populations of 50,000. A population of 600 Griz is too small to be a viable population. I doubt that the USFWS would consider at a population of 600 humans in the greater Yellowstone as viable if there were only 1200 ,+/-more humans in the lower 48 states. The reason a hunting ban is imperative is due to listening to a Montana Fish Wildlife and Parks employee saying "that deer populations are increasing in Montana and we hunt them. And the Grizzly bear will do fine hunting them too ." The mindset that Grizzly bear are like deer is ludicrous. Also whitetail and muley deer populations are doing fine in cities, but not so well in most of Montana. Blue tongue disease and loss of habitat are harming deer populations. Fish Wild and Parks treats predators differently than ungulates. If populations of wolves are not reduced to "acceptable" levels, the hunting season is increased and new hunting methods are allowed. This includes trapping, increase in numbers of wolves allowed by one hunter to take, silencers, etc. This is not done with deer and elk. FWP and federal trappers do not go out and slaughter a herd of elk or deer with aircraft because hunting targets were not met, they were a threat to cattle or they were too close to my cows. I fear tha t Griz will be treated as wolves since 600 bears is our target population to keep the Griz off the ESA and this is our target. We will allow for hunting, bear baiting, etc to keep bear at this population at all costs. Delisting of wolves has not gone so well in Wyoming and the mid-west, at least according to federal judges. Federal funding for Grizzly population surveys will stop after 5 years. Will it then be left up to the states to monitor Grizzly Bear? Is there a funding mandate placed on the states to monitor the Grizzly populations? Economics: There has been new economic information on the value of Grizzly bears for tourism. The study showed that Grizzly bear are an economic driver for tourism	FWS-R6-ES-2016-0042-5183-A1.docx	

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If proposal is approved numbers need to be monitored by US Fish and Wild life independent of state numbers. We don't need continuous crisis management.	Post-delisting monitoring and management	jÃ©yziz FdfciÃ©ba Ah_ .â€œ= E"J- MQLQLQ H,OIQJTI L; ___ ` 4 T Â°Â· M0 D - Â°ÂcÂ·*Ã©n.s On, ___-â€” _! ***5* Spd O 7"ggg "TLJ ,. PMGRRMG B6 STRAP- =Â· ,0 .. __ Safe" G0 QROOLUSBJRK,. :_ _ it 'V\g_, BAJOAGP- kg P6 cock-S L- COT TD _rf](LT' Â°*JJÂ·!ÂQ,H is *9. QT')? 1g.kce MQ mwn gg gv l- J â€”Â __ mi {- .-, l __ yl. LLYLE/3 vv Afrunctstu \$L]lâ€™Âll1â,- .â€” :1 Z ' V' L J , â€”Â· 7:: l Â·â€” l kA Â IT. (l' l . . T1. . M V 1Â·Â»l 1 ai it C) l Â·Â· V1 ll _ ,3; Â»- l ., __. l t_ J" lg ; OU O dlâ,- W V. "" *5 . h _ , l j ,_ QQQ â€”- - l- _ . l _ - bear inxcmxxicxu will iucrusz, and l llllllllllllEBIBll __ _ EXIIFBSSYDIIUVIEYlwm me ,2 \$â€”m 3Â~vÂÂrÂ=ÂÂvÂ1rÂ1uÂhÂsrÂ=u:ÂdiÂ mmzÂ.2ÂÂs angdymusgnm _ ; dÂÂbliÂuhÂbÂ:rpÂpulÂ:iÂÂiÂÂhÂ mÂÂÂÂ:ÂÂÂmy' sÂÂnÂÂÂÂÂ»Âq emmpmumuwmuwm * l ldl Cnurpirnmy, sÂsÂcÂ1theserÂm.arhÂbleÂÂ·canuns. lllll rythe Urwnqsy Rnher um dnuuiug the gziulymi P wYÂÂÂ8 mumshmaldbelpohngfcrwzystc QQ ngicmtntthemnhmmdwhidnmmm lm isolmd, and Lha:muÂabÂch1ÂwledgÂdaÂdÂ1eÂ· gzlzebennrwÃ©naiihuuwgfug mg thrÂÂÂthÂu:hab:Â1md{ÂÂsup- bmdz. wÂ#h1argerÂd1Â;ÂÂ:Â, addedÂveL l l However,!huna:e:nÂ·l: .ÂycÂmpe1- oping biological cnrridcrs between lfiÂ*YPÂpu11dcÂsÂÂhelpeÂn;re Â·` leszupmupremagumtztgagdpw genetic and the Thzgrizrly bÂuÂ·,perh.:pamnm l IIS:rv: cetÂÂhaÂIn:l:c:1:thÂdc11sÂngplan pgpulaumrpmjmbkutngcqedc tlunanyÂthÂÂ·wl1dHfÂspcdÂ,z:prcÂ· Â· grumturb. upubliccomment scnmhzwilduneslhatshapedusu Â· Inmlllll0d has beam mmdqd through andsecuudgndthudaguusmswunlafx an Ameriunpcupln, and it summa lÂgÂpu.latcad:smui: .Âd.InbreedÂ· iugpamnuadzuttntthegunetindi- vcmry cnt lhjw jug, mgm, 1 e-mdlthurcuncursdunngetheinal Whi.lebÂ.Âh1YellÂÇpvgtm1efccdm m' human development, :1 m in sÂmnvÂyscmÂlqnedh1ÂÂiÂgth:y 3 tmdcrstandthatthurmstucnual sÂ]lÂivciÂg:uÂ·mldÂâ€”phyiÂguixh gf FW lf lilies; beartgtthe plglawuealscszmfastiugcude- blisumngnacaidguailyimpnnnd lik wnhymfm S : uyms whale causes almg l cnuzimdlledabenrbeingchased T iu _thc_prÂÂÂ.lÂsothÂftbeseth:Â·gzÂ l . wiped out loud pnpuladmu, until ruchzblz [gm l l mqwptbuamdmmnamyvmau MgecutmenmgnumdbeetleIntu- l l l BCOIDQGIBEEFYQDNQIE. ÂuÂÂ;NÂ\Âup:.SmdiÂbyÂhÂNaz- uillnnededtamslrethazirrunaim l ll Montana. l Â·a ixmchfnrcurchildnnmdgrmd- WTÂ·Â=Â zrmba nuvumy men uhikkm. l Â·Â· The Endmgezedspedukz has l llgsoduuepgzladcnwaqcnimaradu l .- bean. tnqnordmatedeinru bemint.heg:Ât:rYcJ1ÂustÂx1zc:Â- ' Â· qÂmandnedl5rthÂEÂA,gmÂpgÂ- cunglgmnmaumunsejiinqcdud hahna: fungnmiznadanmmnvnpsncwcc mndnuwnthcirmadwncnvuy. ÂÂÂystcm_ uu wwwmwuuw . . y Hcrmgdmgu r lub; Pl fmarwimzduhggÃ©'lf` . -'	FWS-R6-ES-2016-0042-5674-A1.pdf	
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Box 794 Troy, MT. 59935 Re: Comments to FWS re delisting the Grizzly Date Submitted: 5/4/16 The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS. HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for deâ€”listing. In my opinion, HSUS is again correct. Look at the brutal treatment and killing contests involving wolves in these same three states. 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Native News Online.Net also reported that the Oglala Sioux Tribe presented an eightâ€”page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and lish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations." 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Isolated populations: Unfortunately politics punched a hole in the ESA when Senator Testor put a rider on wolf delisting. Up until that point, whole populations needed to be at least stable growing throughout species historic range before delisting could happen. The delisting of pockets of Griz when the bear are not established in their historic range is shortsighted. How are the bear doing in the Cabinet Yaak. How will the bear do around Glacier long term when one looks at human development? What is the acceptable population numbers and habitat that the USFWS has determined for Griz to be delisted in the lower 48 states? Look at all of the human growth in the Madison, Gallatin and Paradise , Boulder and Redlodge Valleys. How does this growth allow for Griz to re-inhabit historic ranges?	Recovery	5-9-16 To whom this does concern, Please accept these comments on the premature Grizzly bear delisting that is proposed the USFWS. 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FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS.	Recovery	RECEIVED To: Public Comments Processing, MAY 0 9 Zum Attn: Docket No. FWS-R6-ES-2016-0042, _ & Div. of Pol1cy. P&A U.S. Fish and Wildlife Service, MS: BPHC, MGMT&P'g& 5275 Leesburg Pike, Falls Church, VA 22041-3803 From: Harry T. Saurman P.O. Box 794 Troy, MT. 59935 Re: Comments to FWS re delisting the Grizzly Date Submitted: 5/4/16 The Greater Yellowstone Ecosystem (GYE), a region of Wyoming, Montana, and Idaho that includes Yellowstone National Park, has the largest grizzly population in the Lower 48. FWS estimates around 700 grizzly bears live in the GYE and perhaps as few as 800 to 1,000 in the entire Lower 48. Compare that with the 50,000 grizzly bears that once roamed North America. The species is far from recovered nationally despite the claims of FWS. HSUS reports that if GYE grizzly bears are delisted, the three states have already signaled, in the form of a leaked memo, that they will open up trophy hunting seasons for the bears. HSUS believes that opening such seasons is a prime motivation for the states in pushing for de"listing. In my opinion, HSUS is again correct. Look at the brutal treatment and killing contests involving wolves in these same three states. It is ugly and awful to be a Montanan who treasures wildlife and yet state governments want to use them for "sport" and as a profit center. FWS asserts, Montana, Idaho, and Wyoming will each have a plan for managing grizzlies as each state sees lit. However, this approach is as flawed with grizzly bears as it is with wolves. The Greater Yellowstone Coalition (GYC) says that the Yellowstone grizzly bear population should be managed as an ecosystem population, not as separate Wyoming, Idaho, and Montana populations. These three states, along with the U.S. Forest Service, National Park Service, Native American tribes and the Interagency Grizzly Bear Study Team must continue to coordinate and communicate, with public input, on bear management. FWS says, the agency says it looks forward to hearing from the public about delisting. The truth is, the public has already made its views known; A recent national poll on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates shows the following:55% of voters oppose the FWS proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Only 26% support delisting. More than two-thirds of Americans oppose opening up a trophy hunting season on grizzly bears in Idaho, Montana and Wyoming. Only 20% support trophy hunting. 50 percent of hunters nationwide oppose delisting of grizzlies. Only 33 percent support it. 62 percent of hunters support a five-year moratorium on delisting. Just 33 percent do not support the moratorium. The FWS agency claims to look forward to consulting with Native American tribes about the delisting. What a joke! FIFTY federally recognized tribes and the Assembly of First Nations sent formal objections to delisting and trophy hunting to Interior Secretary Sally Jewell prior to the FWS delisting proposal. Native News Online.Net also reported that the Oglala Sioux Tribe presented an eight"page resolution that details spiritual, scientific, political, and environmental objections to delisting. Tom Poor Bear, Vice President of the Oglala Sioux Tribe, sees delisting as a way to allow the hunting of their sacred relative, the grizzly bear. "These so-called state game and lish agencies exist to serve a clientele that is 95% white, 95% male, and many of who kill for trophies. They are the vocal minority, and under the systems that exist through colonialism and patriarchy they have been able to dominate, lie and cheat their way into control." Tom Poor Bear concludes: "I warn you from experience gained in many fights with the US government and states, that this is not just about the grizzly bear, it is about the land the grizzly walks upon. If the grizzly is delisted, you will witness a two million acre land grab by energy and mining companies, livestock interests, and timber operations." Like so many groups and interested members of the general public, I do NOT believe the F\NS has the best interests of the public or OUR wildlife in mind with this proposal. It is simply yet another method of exploitation disguised as wildlife "management". I won't fall for il: any longer!! PLEASE DO NOT DEI.LIST THE GRIZZLY BEAR! Submitted by, Har T. Saurman	FWS-R6-ES-2016-0042-5675-A1.pdf	

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GYE grizzly bears are not recovered. Before 1800, approximately 50,000 grizzly bears roamed the lower 48 states between Canada and Mexico. After European settlement, humans heavily persecuted grizzly bears to near eradication. Today, wild grizzly bears number fewer than 1,700 individuals in the lower 48 states while FWS claims that there are 700 grizzly bears in the GYE, this is a contested figure. Grizzly bears have not recovered across a significant portion of their range, and thus they are not recovered and should not be delisted.	Recovery	We, the undersigned scientiic experts, are writing to express our strong opposition to the pmposal by the U.S. Fish and Wildlife Service (FWS) to remove the grizzly bears (Ursus arctos horribilir) living in the Greater Yellowstone Ecosystem (GYE) from protection as a threatened species under the Endangered Species Act (ESA),' leading to Northern Rockies statesâ€™ commencement of an unsustainable trophy- hnntingz season on GYE grizzly bears, which continue to be imperiled by resomee declines, including habitat and dietary staple losses. GYE grizzly bears are not recovered. Before 1800, approximately 50,000 grizzly bea.rs roamed the lower 48 states between Canada and Mexico} After European settlement, humans heavily persecuted grizzly bears to near eradication} Today, wild grizzly bears number fewer than 1,700 individuals in the lower 48 statess â€™ while FWS claims that there are 700 grizzly bears in the GYE,Â° this is a contested figure.? Grimly bears have not recovered across a signincant portion of their range, and thus they are not recovered and should not be delisted. Trophy hunting grizzly bears would further jeopardize their persistence. Pursuant to a tri-state memo, Northem Rockies states have allocated bears for the purposes of "discretionary mortality available for regulated harvest" within the DemogÃraphic Monitoring Area (DMA) as follows: Wyoming would authorize hunting for 58% of the bear quota, Montana 34% and Idaho 8%.9 The number of grizzly bears states will permit for trophy hunting is unknown. While Wyoming has issued a draft grizzly bear management plan, it would inadequately protect GYE grizzly beats in the absence of a federal ESA listing because it gives broad discretion to the Wyoming Game Commission to set the manner of take (e.g., baiting, hounding, trapping, stalking), bag limits, seasons, sex ratios and age limits for grizzly bear hunting.'Â° How Idaho or Montana will permit grizzly bear hunting is also currently unknown. Under this veil of uncertainty, the FWS is rushing to close the public comment period (ignoring reasonable requests for a deadline extension justified by the voluminous documents released by FWS) in order to rapidly delist grizzly bears for what appear to be more political than scicntiic reasons. Such action conflicts with the ESA requirement to make listing decisions solely on the basis ofthe best scientific evidence available and to seek meaningful public comment on listing decisions. Grizzly hears face multiple threats to persistence including the loss of their primary food resotuces. Currently, whitebark pine seeds, native cutthroat trout, huckleberries, army cutworm moths, elk and bison are either declining and/or are expected to decline in the foreseeable iitture as a result of habitat loss, climate change, drought, invasive species and other anthropogenic causes. Traditionally, whitebark pine seeds have provided a core dietary staple for g1Ãizzly bears. Yet, the whitebark pine, a species the FW S agrees warrants federal protection, is in decline because of a variety of problems}! Another key source ofsustenance, the cutthroat trout, has stopped spawning in all tributaries of Yellowstone Lake}2 Army cutworm moths, a staple for grizzly bears since the late 1990Ãs, could likely disappear because they nectar on tundra flowers, which are highly vulnerable to global warming. Added to these threats to the sustainability ofthe GYE grizzly bear population, YellowstoneÃs Jackson and Northern Range elk herds and its Central Range bison herd are all in decline); Because of warming summer temperatures and drought severity since 2005,M berries have become largely unavailable to grizzly bears. These food failuresÃwhitebark pine, cutthroat trout, huckleberriesÃhave caused grizzly bears to switch to a more meat-based diet, including domestic livestock. As a result, bears have been in conflict with humans, leading to record numbers of lethal actions taken against them." 'I'his additive mortality harms their persistence.'Â° Furthermore, biologists have noted that grizzly bear cub production has declined"Ã perhaps because of more predation on cubs by wolves and other bears as a result of their new dependence upon a meat-based diet., which puts them into greater proximity with other predators, resulting in deadly strife on grizzly bear cubs. The loss of flora and fauna upon which grizzly bears depend in Yellowstone and Grand Teton national parks in part explains why grizzly bears are dispersing in greater numbers from park lands to national forests lands which are grazed by	FWS-R6-ES-2016-0042-5687-A1.pdf	
Grizzly bears in the GYE have reached great enough population numbers to no longer meet the definition ofan endangered or threatened species under the Endangered Species Act, as amended (Act). Per the announcement, occupied range has more than tripled in size. Localofficials say the range is fully occupied and young or transient bears encounter difficulty in establishing their own home ranges.	Recovery	The Fremont County (Idaho) Farm Bureau (FCFB) strongly supports Grizzly bear delisting under Docket No. FWS-R6-ESÃ16-0042. The FCFB is one of 37 county Farm Bureaus comprising the Idaho Farm Bureau Federation, whose combined membership is over 73,400 member families throughout the state. FCFB members live on the eastern edge of the Greater Yellowstone Ecosystem (GYE) and are directly impacted by Grizzly bears and the regulations surrounding them. I agree with the Federal Register announcement of Nlarch 11; 2016, Grizzly bears in the GYE have reached great enough population numbers to no longer meet the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). Per the announcement, occupied range has more than tripled in size. Local officials say the range is fully occupied and young or transient bears encounter difficulty in establishing their own home ranges. The states of Wyoming, Idaho and Montana requested delisting the GYE Grizzly bear population and are working on post-delisting management plans. FCFB supports these efforts as well as the delisting of the GYE Grizzly bear population. Thank you for the opportunity to express my support for Docket No. FWS-R6-ESÃ2016- 042.SincereAly;FF# _____ Ã'{'~ t~<i'i'~i~<Ã™1j -*6 Ear C The US Fish and Wildlife Service recently released a proposed rule to remove Endangered Species Act protections from grizzly bears in the Greater Yellowstone Ecosystem (GYE). The move would allow the states of Montana, Wyoming and Idaho to assume management authority and institute hunts in addition to better management of bears that come into conflict with humans and livestock. The Service's proposed rule indicating that the decision by the agency to pursue delisting at this time is in response to extensive study of this animal and the application of sound science and the public's safety. This proposed rule will allow the states to use hunting and management removals of bears that wander beyond social tolerance zones. Comments to the Fish and Wildlife Service on the Proposed Rule and the associated revised Recovery Plan and Conservation Strategy are due by May 10, 2016. We urge you to make your voice heard in Support of the removal of Endangered Species Act protections from GYE grizzlies. Please take a moment to do one of the following to make sure you voice is heard â€ Sign and mail the attached letter â€ Write and send your own letter in support of delisting the Greater Yellowstone Grizzly â€ Go to the federal Register and submit comments asking for the Delisting of the Greater Yellowstone Grizzly hl_,;IÃs:[www.regulation5.ggv[# submitCommentÃ, D=FWS-R6-ES-2016-004} 0001 lxpmc Siicarol col in I Q5. Ã Y II I l s cure: Ouctwe atx\\ lwc. all Wikflg ~ Y I 2, I 6 Gy g,ÃlÃ"l @,\\OwOcGleÃl la E 5- ... w Wklñjh to 42 YI S 1 I 0 V\\0 . ljq Ãâ,~ I l\\ ` cl Own {Y "Ã Cla Qld gl we, in D MOL OGL â,~/ Ã~ l j ` 4 FEEL Ã» j QCÃ~,l C V. O lÃ™II\\â,~Ãllo la l ~lÃ"O re l E A 9 UL ,_i_}ÃQ, Y\\,~â,~;â,~JÃ 'l'Ã Q CL B`n , , & D	FWS-R6-ES-2016-0042-5689-A1.pdf	

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But your recently announced proposal to remove federal protections under theEndangered Species Act is premature and comes at a time where only 700 of these iconic bears are known to exist in the Greater Yellowstone Ecosystem and shockingly only 1,400to 1,700 bears in the entire lower 48 states.	Recovery	Yellowstone’s grizzlies, once teetering on the brink of extinction, are only now starting to recover. But your recently announced proposal to remove federal protections under the Endangered Species Act is premature and comes at a time where only 700 of these iconic bears are known to exist in the Greater Yellowstone Ecosystem and shockingly only 1,400 to 1,700 bears in the entire lower 48 states. We stand with The Humane Society of the United States in urging you to keep grizzly bears protected. If the proposal to delist is successful, the future of Yellowstone’s grizzly bears will be placed in the hands of Montana, Wyoming and Idaho state wildlife managers who have already made clear their intentions to open up the population to trophy hunting. Grizzly bears are an iconic species, representing the natural beauty and magnificence in many of our country’s last remaining wild spaces. This holds true no more than in Yellowstone National Park and the surrounding region, where grizzly bears are cherished by both tourists and locals alike. Killing these animals in order to stuff them for display and bragging rights is shameful and will only setback our efforts to help the population recover. We cannot let history repeat itself. Grizzlies were once an abundant species in the Yellowstone region but suffered from overwhelming persecution by hunters up until recent decades. This resulted in the need to list Yellowstone grizzlies as threatened under the ESA in the 1970’s when their number dipped to 136 individuals and the population is faced yet again with a threat to its very existence from trophy hunting if this proposal goes forward. Yellowstone grizzly bears still need our help. They continue to face critical challenges such as habitat loss and climate change. Removing protections for Yellowstone grizzlies now will leave the population with little hope of recovery. You and your predecessors have invested too much into the recovery of this national icon to give up on them. Please keep the Yellowstone grizzly bear listed as a threatened species under the ESA and prevent history from repeating itself.	FWS-R6-ES-2016-0042-5694-A1.pdf	
While the population has increased since it was listed as threatened under the Endangered Species Act, simply the number of bears in a population alone does not necessarily indicate a stable or healthy population. Stable and healthy populations are determined by genetic diversity, the proportion of females of reproductive age, population trends, and the quality of habitat.	Recovery	I oppose the delisting of the Greater Yellowstone Ecosystem grizzly bear population at this time. While the population has increased since it was listed as threatened under the Endangered Species Act, simply the number of bears in a population alone does not necessarily indicate a stable or healthy population. Stable and healthy populations are determined by genetic diversity, the proportion of females of reproductive age, population trends, and the quality of habitat. However, in the last decade, the GYE has essentially lost all its whitebark pine to the combination of the non-native blister rust and enormous outbreaks of mountain pine beetle, both exacerbated by climate change. Meanwhile, droughts and competition from non-native lake trout have extirpated westslope cutthroat trout from Yellowstone Lake. While many bear populations may adapt to climate change fairly easily, the GYE grizzlies are losing so many crucial food resources at the same time. Grizzlies are among the slowest reproducing land mammals in North America, and it can take a long time for declining populations to recover, especially with decreasing food resources. Due to declines in key food sources and with loss and degradation of available habitat, I oppose the removal of the GYE grizzly population from the list of threatened species at this time. While the current delisting proposal does address declines in whitebark pine, it fails to consider the significance of the whitebark pine nut to the GYE grizzly bear population .. Whitebark pine nuts are a high protein food source that once was abundant in the GYE and offered a concentrated food source requiring low caloric output. While bears are amazingly adaptable omnivores, they depend on abundant food resources to sustain them through both the months when they are active and through winter hibernation. There is no readily available alternative equivalent to the whitebark pine nut in the GYE. At the same time, grizzly habitat is being converted to residential subdivisions, ranches, and resorts, and as grizzlies set out to explore food resources in other areas, they meet up more and more with humans, often to their own demise. Army cutworm moths, another key food source that could potentially serve as an alternative lives high in the alpine, and their populations are vulnerable to climate change and exposure to pesticides. I applaud the conservation and management efforts that are successfully moving the Greater Yellowstone grizzly population toward recovery, but delisting the population at this time is premature.	FWS-R6-ES-2016-0042-5415-A1.docx	

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For an animal that once ranged from Hudson Bay in Canada's northeast , all the way to the Pacific Ocean coast , and south as far as Guadalajara Mexico , the proposal to sustain the Grizzly on an island with a hard population ceiling (700 bears) and a hard population floor (500 bears) with nearly zero opportunity for that island population to expand and interchange with other grizzlies in the Rocky Mountains is patently absurd.	Recovery	US Fish & Wildlife Service COMMENT on draft proposal to Delist the Yellowstone Grizzly I am a Wyoming native who lives in Cody , 50 miles from Yellowstone Park on the edge of the Greater Yellowstone Ecosystem. Much of my life has been spent in the backcountry of the Absaroka Range in prime grizzly habitat, and countless hours in Yellowstone Park. I reckon I have had around 200 encounters with and close range sightings of Grizzly bears in my lifetime, all good. The Great Bear is a topic of major concern in my region. I've engaged the state and federal agencies on grizzlies ands other issues for over 40 years. I feel qualified to give a considered opinion on Grizzly management. I am strongly opposed to the Delisting of the so-called Yellowstone Grizzly Bear. The proposal by USFWS to Delist the Grizzly and give management over to the states of Wyoming, Montana , and Idaho is flawed. The only reasons that justify grizzly delisting are political. The reasons against delisting are expressions of accumulated science, the ecology and range management aspects, habitat concerns , and the appalling prospect of allowing the State game agencies to " manage" grizzly bears given their track record and narrow views; e. g. the Wyoming Game and Fish draft plan for management falls apart if the goal is to assure a healthy bear population in the far future. Neither Fish & Wildlife nor Wyo Game and Fish have produced a plan to guarantee the Yellowstone Grizzly's sustainability based on the needs of the bears. All plans put forth are People Plans , not Bear Plans. Best Available Politics, not science , not genuine wildlife conservation. After 40 years and \$ 40 million in research and bear management , I expected a delisting plan that actually helped the bears. Instead we get proposals that cow-tow to special interests and decidedly non-wildlife priorities. It is disappointing that delisting looks like this. We can do better. For an animal that once ranged from Hudson Bay in Canada's northeast , all the way to the Pacific Ocean coast , and south as far as Guadalajara Mexico , the proposal to sustain the Grizzly on an island with a hard population ceiling (700 bears) and a hard population floor (500 bears) with nearly zero opportunity for that island population to expand and interchange with other grizzlies in the Rocky Mountains is patently absurd. I seem to recall back a couple decades ago that USFWS/ IGBST said they would endevaour to bring in 'outside' grizzly bears to augment the GYE gene pool. I feel strongly that when the Grizzly was originally listed as Threatened under the ESA back in 1975 , the starting population of (maybe) 130 grizzlies then was not sufficient for genetic viability. I still feel that way , and scientists have not convinced me otherwise. Talk is cheap. Mitochondrial DNA Analyses is a young science and not the USFWS' strongest suit. Forty years is far too short of a genetic interval to be manufacturing conclusions. Besides, the Yellowstone Grizzly is NOT a distinct population or even a subspecie of Ursus arctos . That is a deceit; a biological accounting trick. Sentencing the Grizzly to remain behind an artificial map line as a Distinct Population in a Demographic Monitoring Area is a huge falsehood. Surely Fish and Wildlife knows that Grizzlies are well suited to occupation of many areas of their former ranges and domains in the West . There is a lot of suitable habitat. Why doesn't USFWS have a mechanism to connect Yellowstone bears to the huge Selway-Bitterroot Wilderness of north central Idaho ? There should be provisions for safe passage in both directions from the Greater Yellowstone Ecosystem (GYE) to the Selway via the Red Rock Lakes wildlife refuge corridor. Bears should also be allowed to move up the Continental Divide north and west of Yellowstone towards Canada. The agency should also translocate GYE grizzlies to the San Juan Mountains of Colorado, and areas in northwest Colorado. The Uintah Mountains in northeast Utah should be considered for grizzly repopulation. It is disgusting to me personally that neither Grizzlies nor Grey Wolves are allowed to expand into other areas of my Wyoming without becoming a target for a rifle. The southern Wind River Mountains and Wyoming-Salt River Range deserve bears. A case could be made for the Pryor Mountains on the Montana-Wyoming border and the northern end of the adjacent Big Horn Mountains as new grizzly range. The Crow Tribe has said as much. You should listen to the Tribes on the topic of grizzlies. Frankly, if a Giant Panda bear can be relocated from the bamboo jungles of south	FWS-R6-ES-2016-0042-5487-A1.rtf	