

May 10, 2016

Public Comments Processing
Attn: Docket No. FWS-R6-ES-2016-0042
U.S. Fish and Wildlife Service, MS: BPHC,
5275 Leesburg Pike, Falls Church, VA 22041-3803

RE: 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 FWS-R6-ES-2016-0042

Dear Director Ashe,

Thank you for the opportunity to comment on the Proposed Delisting Rule, the Draft Grizzly Bear Recovery Plan Supplement: Revised Demographic Criteria and Draft 2016 Conservation Strategy, released on March 11th, 2016 for public review. These comments are submitted on behalf of the Jackson Hole Conservation Alliance (Alliance).

The Alliance represents over 2,000 constituents in Teton County, WY and works to protect the wildlife, wild lands and community character of Jackson Hole. We envision healthy and sustainable wildlife populations with protected habitat. For grizzly bears, we envision a healthy and thriving population of bears in the Greater Yellowstone Ecosystem (GYE), well connected to other grizzly populations in the continent and with minimal levels of conflict that are well-managed.

The growth of the grizzly bear population in the GYE over the last five decades is a conservation success to be celebrated. We appreciate and commend the work done by our land and wildlife management agencies, conservation non-profits, land owners to achieve this conservation success. This outcome is also a clear demonstration of the power and efficacy of the protections afforded to wildlife under the Endangered Species Act (ESA).

However, we are concerned by several issues in the process of delisting and the rule itself. Broadly, the process has been confusing: several state plans, Forest plan amendments and the Conservation Strategy are all in draft form. These plans will form the basis for any future post-delisting management of bears. As these plans are in flux, it becomes a challenge to comment on several moving targets.

In addition to our issues with the process, we also have concerns regarding the Conservation Strategy and its revised demographic criteria as well as Wyoming's State bear management plan. Our conservation partners at the Greater Yellowstone Coalition (GYC) have submitted extensive comments on these issues. We would like to adopt and incorporate Greater Yellowstone Coalition's comments by reference (GYC comments submitted May 10, 2016 by Chris Colligan, Wildlife Program Coordinator). Please have the administrative record reflect this fact.

Overall, we hope that you will consider these comments as you finalize this rule.

Sincerely,



Siva Sundaesan
Conservation Director