



National Association of Conservation Districts

May 10, 2016

The Honorable Dan Ashe
U.S. Fish and Wildlife Service
Public Comments Processing
Attention: Docket No. FWS-R6-ES-2016-0042
5275 Leesburg Pike
Falls Church, VA 22041-3802

Submitted via Federal Rulemaking portal: <http://www.regulations.gov>
RE: Endangered and Threatened Wildlife and Plants; Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears From the Federal List of Endangered and Threatened Wildlife (Docket No. FWS-HQ-ES-2015-0126)

Director Ashe:

The National Association of Conservation Districts (NACD) is pleased to submit the following comments on the U.S. Department of Interior (DOI), U.S. Fish and Wildlife Service (Service) 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. (Docket: FWS-R6-ES-2016-0042)

NACD represents America's 3,000 locally led conservation districts that work with millions of cooperating landowners and operators to help them manage and protect land and water resources on private and public lands in the United States. Established under state law, conservation districts share a single mission: to work cooperatively with federal, state and other local resource management agencies as well as private sector entities to provide technical, financial and other assistance to help landowners and operators implement conservation practices on the landscape.

Conservation districts nationwide remain actively engaged in support of conservation practices for listed species, proposed plans and candidate species for listing under the Endangered Species Act (ESA). With regard to the proposed delisting of the Greater Yellowstone Ecosystem (GYE) population of grizzly bears, NACD is encouraged to see the Service taking a proactive step using the best available scientific data available to determine that the subspecies of grizzly no longer meets the definition of an endangered or threatened species under the ESA.

NACD supports the Service's proposal to identify the GYE grizzly bear population as a distinct population segment. The best available scientific and commercial data shows that since being listed as threatened in 1975, that the GYE grizzly bear population has increased and more than tripled its occupied range. This information shows with scientific merit that the population of this subspecies of grizzly bear has recovered and warrants a removal from the threatened and endangered species list.

The Service's proposal is in line with the Secretary of the Interior's authority to list distinct population segments as endangered or threatened and the Service's 1993 Recovery Plan, which identifies distinct Recovery Zones and unique demographic parameters for six different grizzly bear populations with the intent that these individual populations would be delisted as they each achieve recovery.

In 1991, the Interagency Grizzly Bear Study Team (IGBST) made up of the National Park Service, Wyoming Game and Fish Department, U.S. Fish and Wildlife Service, Montana Fish, Wildlife and Parks Department, U.S. Forest Service, and the Idaho Fish and Game Department staff, issued a report entitled, Yellowstone Grizzly Bear Investigations. The report found that "after 10 years of food habits data collection, new feeding strategies continued to appear annually in this population." A 2014 review documented that the GYE grizzly bears consumed over 260 species of food, representing 4 of the 5 kingdoms of life. As a generalist species, GYE grizzly bears are always sampling new food sources, in addition to following the traditional seasonal food movements.

The GYE is part of the Middle Rockies which provides the GYE grizzly bears the habitat heterogeneity necessary for adequate food, denning, and cover resources. The Service has worked to limit motorized access, providing GYE grizzly bears with habitat areas at least 1,650 feet from motorized access route and greater than 4 hectares in size. In 2001, the IGBST used population viability analyses (PVA) to assess the status of the GYE population, estimating that the population had a 1 percent chance of going extinct within the next 100 years and a 4 percent chance of going extinct in the next 500 years.

NACD understands that the GYE grizzly bear recovery effort has required and will continue to require the cooperation of federal, state, local, and tribal governments and agencies. The three interagency groups: the IGBST, the Interagency Grizzly Bear Committee (IGBC), and the IGBC's Yellowstone Ecosystem Subcommittee, working on the GYE grizzly bear management have been effective. The Service has concluded using scientifically based habitat suitability criteria, the GYE contains approximately 17,774 square miles of suitable grizzly bear habitat and is able to sustain the GYE grizzly bear population.

NACD is confident that Idaho, Montana, and Wyoming will adopt the necessary post-delisting management objectives to ensure the GYE grizzly bear population remains recovered and allows for the U.S. Fish and Wildlife Service to provide a final delisting rule. The National Association of Conservation Districts are encouraged by the Service utilizing the flexibility offered within the ESA itself to address the GYE grizzly bear and will work as the local landowner and stakeholder conduit to ensure that voluntary conservation practices on private and public land are able to prevent the return of GYE grizzly bear to the threatened or endangered species list.

Sincerely,



Lee McDaniel
President