



Post Office Box 1693
Helena, MT 59624
Phone (406) 442.1330
Fax (406) 449.8606
UPS Delivery: 7 Edwards St.



October 7, 2016

Submitted by Electronic Means

RE: Montana Wool Growers Association Comments concerning the Proposed Removal of Federal Protection of Grizzly Bears in the Yellowstone Area.

To Whom It May Concern:

The following comments are submitted on behalf of the membership of the Montana Wool Growers Association (MWGA). MWGA represents Montana's sheep industry. As part of MWGA's mission, MWGA reviews and comments on proposals, such as this one, that will have a substantial impact on agriculture production in Montana.

MWGA's membership strongly supports the delisting of the Greater Yellowstone Grizzly Bear population. MWGA's membership strongly supported the delisting of this grizzly bear population during the previous two attempts to delist the species as well. The grizzly bear recovery effort has been successful and should be recognized as such. As a result of the success of the recovery efforts, it is time for management of the bear to return to the state and local levels.

The proposed delisting is justifiable and scientifically supported. The Yellowstone Grizzly Bear population met its numerical recovery goal of 500 bears for the entire ecosystem nearly a decade ago. Therefore, the population should have been delisted a decade ago.

Today, there are presently an estimated minimum of 700 grizzly bears in the Greater Yellowstone Ecosystem. The science clearly shows that this numeral amount is at or near the carrying capacity for grizzlies within the GYE. Thus, should the bear not be subject to state management, as would be the case due to delisting, the population will quickly reach a saturation point. At that point in time, the already high mortality rate for grizzly bears caused by other grizzly bears will skyrocket. As a result, it is appropriate for the various states impacted by the Yellowstone Grizzly population to undertake efforts, such as by instituting tightly regulated hunting and other discretionary mortality actions, to control the expanding bear population in order to ensure the continued health of the population.

The science also shows that grizzlies located within the GYE have more than doubled their range since the species was listed in the 1970s. In recent years, the grizzly bear is being spotted in areas of Montana where such bears have not been seen for over a century. The wide dispersal of the Yellowstone Grizzly Bear Population demonstrates both that (1) the high number of bears within the core of the GYE is causing bears to disperse and (2) the conditions are present to allow connectivity by and between the differing bear populations. This latter point has been confirmed by all three of the state wildlife management agencies: Wyoming, Montana, and Idaho. As a result of this proven habit expansion, all of the criteria for delisting have now been satisfied.

In addition, as the grizzly bear population has steadily grown, the need for state management of the species has grown proportionally. State management is necessary to give state wildlife agencies and agriculture producers, such as Montana's sheep producers, the tools needed to protect livestock from grizzly bear depredations and to prevent grizzly bear-livestock conflicts from happening in the first instance. At present, because of the strict management restrictions placed by the Endangered Species Act on livestock owners, livestock owners have no ability to protect their livestock or their private property from grizzly bears without facing civil penalties or criminal sanctions. This is an untenable situation for agriculture producers. The Endangered Species Act is making criminals out of otherwise law-abiding citizens merely because those citizens seek to protect their homes, their families, their persons, and their properties from harm. The ESA was never intended to have this kind of adverse impact. As a result, when a species is recovered, such as the case with the Greater Yellowstone Ecosystem grizzly bear population, the species must be delisted in order to increase public tolerance of the damage done by the species.

Public tolerance and support of those most personally impacted by the species, such as Montana's sheep producers, is absolutely essential to the long-term success of the recovery effort. And, as it stands now, that tolerance and support is being undermined by the obstructive litigation that has been, and assuredly will be, filed by self-styled environmental organizations on this and other ESA delisting decisions. Montana's sheep industry desires to see the ESA work on both ends. That is, to see that a species that has been put under federal protections is released from those protections once the recovery criteria have been satisfied.

What is more, the membership of the MWGA is acutely aware that the State of Montana has put in place management actions that will ensure the viability of the Yellowstone grizzly bear population. MWGA has, itself, taken affirmative action in this regard. In 2013, the Association requested legislation, which was enacted into law, that authorizes funding for the State of Montana to use to reimburse livestock producers for economic loss caused by grizzly bear depredations. Further, the same bill and resulting program also authorizes funding for conflict prevention and mitigation programs. While Montana Governor Steve Bullock twice vetoed funding for the latter program, these programs, when viewed in conjunction with Montana's adopted grizzly bear management plan, will ensure that a viable and healthy grizzly bear population will remain post-delisting. The peer reviews performed on the science analyzing the tri-state bear management objectives demonstrate conclusively that the states' post-delisting management prescriptions are adequate to ensure the species can co-exist with humans and thrive without the need for enhanced federal protections.

Again, MWGA's membership strongly supports the removal of Yellowstone area grizzly bear population from the Endangered Species Act list. This is because, as the science performed on the post-delisting state management actions and plans and performed on the health of the current bear population and on the current range and habitat of the species shows, the time has come to turn management of Montana's grizzly bear population back over to the citizens of Montana.

MWGA Comments on Grizzly Bear Delisting
October 7, 2016
Page 3 of 3

On behalf of the Montana Wool Growers Association, we thank you for this opportunity to comment. Any questions regarding the content of the remarks contained herein may be directed to the undersigned by emailing thunderdomelaw@gmail.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. E. Brown', is written over a horizontal line. The signature is stylized and somewhat cursive.

James E. Brown
Director of Public Affairs
Montana Wool Growers Association

cc: MWGA Board of Directors