

Dear USFWS Director Martha Williams and Secretary of the Interior Deb Haaland,

We, the undersigned, provide comment on the ongoing Grizzly Bear Status Review and strongly urge the USFWS to maintain the species' current "threatened" status by rejecting the petitions from Montana and Wyoming to remove Endangered Species Act protections for grizzlies in the Greater Yellowstone Ecosystem (GYE) and Northern Continental Divide Ecosystem (NCDE).

Certainly there has been clear progress in recovering grizzly bear populations in these two areas, which took an incredible amount of time, effort, and money to make happen. When grizzlies were listed in 1975, it was doubtful they could ever recover, but decades of conservation efforts have enabled grizzly populations to grow in the GYE and NCDE. And while population numbers are important, so is secure habitat which grizzlies still lack outside their official recovery areas. Further, grizzly bears in all of the Grizzly Bear Recovery Areas remain isolated from each other, and those in the Selkirk and Cabinet-Yaak Ecosystems continue to struggle; the Bitterroot Ecosystem has no official population at all. Removing grizzly bear protections now will not only undermine decades of recovery efforts, it will undoubtedly increase human-caused mortality that remains a key threat to grizzly bears. This includes bears killed due to conflict with livestock, (perceived or real), or for human safety concerns, in addition to the deaths from vehicle accidents, hunter misidentification, and poaching. In fact, as of November last year, 47 grizzly bears from the GYE were killed and 43 were killed from the NCDE, most by state agencies with USFWS approval. These deaths occurred even with Endangered Species Act protections in place, and removing them will only increase bear mortality. Montana and Wyoming have laws and regulations that already endanger grizzlies and show how hostile they are to this majestic animal. Putting the states in charge of management is tantamount to signing their death warrant. From the state's perspective, a "managed" bear is a dead bear.

Delisting should only be considered when they have stable and growing populations in all the Grizzly Bear Recovery Areas, including the Bitterroot, Cabinet-Yaak, and Selkirk Ecosystems. And when there is safe and secure habitat between these areas that provide for natural demographic and genetic connectivity. Grizzlies are on the path to recovery as a result of tremendous work by many interests to conserve habitat, prevent conflicts and allow bears to be bears. Now is not the time to remove protections, but rather to keep going and enable grizzlies in the Northern Rockies to thrive.