

U.S. House of Representatives
Committee on Natural Resources
Washington, DC 20515

May 18, 2017

The Honorable Ryan K. Zinke
Secretary
U.S. Department of Interior
1849 C St NW
Washington, DC 20240

Dear Secretary Zinke:

I write to reiterate my strong opposition to the U.S. Fish and Wildlife Service (Service) proposal to remove Endangered Species Act (ESA) protection for grizzly bears (*Ursus arctos horribilis*) in the Greater Yellowstone Ecosystem (GYE). Over the past forty-two years, GYE grizzly bears have made remarkable progress toward recovery. While this progress is worthy of celebration, it does not warrant a withdrawal of federal protections under the ESA. The Service's delisting proposal threatens to reverse the conservation gains of the last four decades, putting grizzly bears once again at risk of extinction.

The best available science does not support the Service's decision to delist the GYE grizzly bear population without putting in place strong safeguards to prevent population decline and ensure connectivity with other populations of grizzly bears. The GYE grizzly bear population remains in peril from the combined effects of habitat loss and fragmentation, climate change, decline of primary food sources, and human-caused mortality. These factors, especially when coupled with a possible delisting and subsequent threat of mortality from trophy hunting, could seriously jeopardize the future of the species. I noted these concerns, along with the concerns of the National Park Service, in a September 2016 letter to the Fish and Wildlife Service. Unfortunately, the issues I raised have not been addressed. It is no surprise that a considerable number of scientific experts, including globally renowned and respected conservationist Jane Goodall, have concluded that "the best available science and the precautionary principle demands continued federal monitoring of this valuable population, which will only happen with continued ESA protection."

Furthermore, the Service's piecemeal approach to this delisting proposal has seriously harmed the public's opportunity to meaningfully participate in this process. Since the proposal to delist was published in 2016, the public has been asked repeatedly to comment on incomplete components. The first comment period did not include state management plans. The peer review process was marked by a conspicuous lack of significant documents. The Service has not scheduled a peer review or comment period of the final GYE Grizzly Bear Conservation Strategy (Conservation Strategy) and has never indicated that it intends to do so. Denying the public the

opportunity to meaningfully review the entire delisting package, including a final Conservation Strategy, makes a mockery of the public involvement process mandated by the ESA.

Moreover, several Tribal Nations – including the Navajo, Osage, Oglala Sioux, Crow Nation and Piikani Blackfoot, among others – have formally requested that the Service consult with impacted Tribal Nations prior to making any decision on delisting. In the historic *The Grizzly: A Treaty of Cooperation, Cultural Revitalization and Restoration*, and through multiple resolutions and letters, Tribal Nations have raised concerns over the science being presented by the Service and the irreparable harm to Tribal sovereignty, sacred site protections, treaty rights, consultation mandates, and spiritual and religious freedoms should the delisting process continue as it is presently constituted. The Service must initiate a formal consultation process on this delisting before a decision is made, and impacted Tribal Nations should be included in the formulation of all grizzly bear management plans.

Proceeding with this premature, piecemeal and politically driven approach would violate the ESA and grievously undermine tribal rights. I urge you to strongly oppose the Service's delisting plan.

Sincerely,



Raul M. Grijalva
Ranking Member
Committee on Natural Resources