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PUBLIC SUBMISSION

Comment from High Country Observations

Posted by the **Fish and Wildlife Service** on Mar 20, 2026[Docket \(/docket/FWS-HQ-ES-2025-1465\)](/docket/FWS-HQ-ES-2025-1465)[/ Document \(FWS-HQ-ES-2025-1465-0001\) \(/document/FWS-HQ-ES-2025-1465-0001\)](/document/FWS-HQ-ES-2025-1465-0001) / [Comment](#)

Comment

Subject: Public Comment on ESA Management, 10(j) Framework, and Grizzly Bear Delisting
To Whom It May Concern,

We are writing to provide comment regarding the proposed continuation of existing rules governing experimental populations under Section 10(j) of the Endangered Species Act, including those applicable to Colorado gray wolves, grizzly bears, and Mexican wolves.

The 10(j) framework has proven to be an important tool in balancing species recovery with practical management flexibility. Provisions such as designated agents, written take authorizations, and structured reporting requirements reflect a system designed to align conservation goals with the realities of managing wildlife across working landscapes. Maintaining clarity and consistency in these authorities is essential for effective implementation and public trust.

With respect to grizzly bears in the Greater Yellowstone Ecosystem, the population's recovery, from approximately 136 individuals in 1975 to over 1,000 today, represents one of the most significant conservation achievements under the ESA. At the same time, increasing mortality, expanding distribution, and rising human-wildlife conflict indicate that management is now operating in a different phase than initial recovery.

In considering delisting, we encourage the Service to clearly define what constitutes "recovery" under the ESA, not only in biological terms, but also in terms of sustainable management, public tolerance, and conflict mitigation capacity. Recovery should not be viewed as a static population threshold, but as a dynamic condition that includes ecological stability and practical management tools.

Clear and transparent criteria for both listing and delisting are essential to maintaining the integrity of the ESA as a recovery-based framework. Prolonged delays in delisting decisions, despite apparent biological recovery, risk creating uncertainty among stakeholders and may undermine confidence in the Act's

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implementation.

The continued success of these programs will depend on the ability to transition from recovery to long-term management in a manner that is both scientifically grounded and operationally sustainable.

Thank you for the opportunity to provide comment.

Respectfully,
-High Country Observations
Boulder, CO

Attachments 1



HCO Public Comments USFWS May 11



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