

May 9, 2016

Sally Jewell, Secretary U.S. Department of the Interior
Daniel Ashe, Director, U.S. Fish and Wildlife Service
1849 C Street NW
Washington, DC 20240

Re: Docket FWS–R6–ES–2016–0042, Maintain Endangered Species Act Protections for Grizzly Bears

Dear Secretary Jewell and Director Ashe:

On behalf of our millions of members, we, the undersigned 84 organizations, oppose the U.S. Fish and Wildlife Service (FWS) proposal to remove grizzly bears (*Ursus arctos*) in the Greater Yellowstone Ecosystem (GYE) as *threatened* from the U.S. Endangered Species Act (ESA). The proposal is premature as 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.¹ Delisting and subsequently adding the threat of mortality from trophy hunting could seriously jeopardize grizzly bears.

Grizzly bears are an iconic species in our country and the majority of Americans do not support their persecution. According to a recent poll, the majority of American voters oppose the proposal to delist GYE grizzly bears from the ESA.² When asked, 60% of prominent grizzly bear biologists: “believe delisting would be an incorrect decision, or at the very least a violation of the precautionary principle.”³

GYE Grizzly Bears Have Not Recovered and Face Serious Threats to Their Continued Recovery.

Grizzly bears occupy a small fraction of their historic range and live on isolated geographic islands. The FWS suggests that before 1800 approximately 50,000 grizzly bears roamed the lower 48 states from northern Mexico to Alaska.⁴ After European settlement, humans heavily persecuted grizzly bears to near eradication.⁵ Today, according to the federal government, grizzly bears number between 1,400 and 1,700 individuals in the lower 48 states⁶ – with between 674 and 747 grizzly bears in the GYE.⁷ But grizzly bear biologists contest that population figure.⁸

Grizzly bears’ two primary staple foods, whitebark pine and cutthroat trout, are in precipitous decline.⁹ This should signal to wildlife managers that grizzly bear conservation efforts should not be stripped away at the very time when they face a food crisis. These food losses have caused bears to reduce their density from their core, protected habitat as they disperse further afield to find sufficient food resources. Compounded with these threats, removal from federal listing would jeopardize the continued health and persistence of the GYE grizzly bear population.

Grizzly Bears are Not Resilient to Human Persecution.

If federal protections are removed from GYE grizzly bears, the states of Idaho, Montana, and Wyoming will rush to open up trophy-hunting seasons. Indeed, these states have already divvied up hunting rights for the bears.¹⁰ Additionally, bears that leave the GYE core habitat would be subject to trophy hunting adopted by state wildlife managers, despite the fact that these dispersing individuals could provide vital connections between other subpopulations, maintaining genetic diversity.¹¹

Large-bodied carnivores are sparsely populated across vast areas; they are slow to reproduce, provide extended parental care to their young, and social stability promotes their resiliency.¹² Human persecution affects their social structure,¹³ harms their persistence,¹⁴ and is “super additive” – meaning that hunting pressures far exceed what would occur in nature.¹⁵

Hunting mortality has direct effects on population growth rates because of increased mortality, but it can have indirect effects, too, such as disrupting the sex and age structure of a population.¹⁶ Hunting bears during their period of *hyperphagia* is energetically costly to them as they shift their sleeping patterns and become more nocturnal to avoid being hunted,¹⁷ and hunting females can influence a lifetime of reproductive success.¹⁸ Females with cubs generally avoid males as a strategy of avoiding sexually-selected infanticide, but this means that they often choose suboptimal habitats, including in closer proximity to humans, and this affects their diet quality and reduces their reproductive potential.¹⁹ Hunting makes the risk of sexually-selected infanticide greater, which leads to increased avoidance of males by females, and, ultimately, to lower fecundity.²⁰

Right now, an unsustainable number of grizzly bears are dying in the GYE. In 2015, approximately 60 grizzly bears—excluding the bears that agents could not find—are known to have died in the GYE from various causes.²¹ This is a substantial portion of the estimated population of the slowest-reproducing mammal in North America. Meanwhile, more than half of grizzly bears killed by humans go unreported—from 46 to 66 percent.²²

Protection under the ESA has benefited GYE bears, but the population is not yet recovered. Instead of delisting and handing management to states, we strongly urge you to renew your commitment to conserving this iconic species.

Sincerely,

Nicole Paquette
Vice President, Wildlife Protection
The Humane Society of the United States
Washington, DC

Andrea Santarsiere
Staff Attorney
Center for Biological Diversity
Victor, ID

Jessica L. Blome
Senior Staff Attorney
Animal Legal Defense Fund
Cotati, CA

Tamra Brennan
Executive Director
Kindness Ranch Animal Sanctuary
Hartville, WY

Travis Bruner, J.D.
Executive Director
Western Watersheds Project
Hailey, ID

Larry Campbell
Conservation Director
Friends of the Bitterroot
Hamilton, MT

John Carter
Manager
Yellowstone to Uintas Connection
Paris, ID

Adrienne Cronebaugh
Executive Director
Kootenai Environmental Alliance
Coeur d'Alene, ID

Mike Garrity
Executive Director
Alliance for the Wild Rockies
Helena, MT 59624

Jonathan Hunt
Owner
Grizzly Country Wildlife Adventures
Jackson, WY

Matthew Koehler,
Director
WildWest Institute
Missoula, MT 59802

Penelope Maldonado
Executive Director
The Cougar Fund
Jackson, WY

Sally Maughan
President
Idaho Black Bear Rehab, Inc.
Garden City, ID

Kent Nelson
Executive Director
Wyoming Wildlife Advocates
Wilson, WY

Kelly Nokes, JD
Carnivore Campaign Lead
WildEarth Guardians
Missoula, MT

Jeff Rosenthal, DVM
Chief Executive Officer
Idaho Humane Society
Boise, ID

Mady Rothchild
President
Animals in Distress Association, Inc. (AIDA)
Boise, ID

Michelle Uberuaga
Executive Director
Park County Environmental Council
Livingston, MT

Nancy Warren
Executive Director
National Wolfwatcher Coalition
Gardiner, MT

KC York
Chair
Trap Free Montana Public Lands
Hamilton, MT

Noelle Almrud
Interim Director
Cleveland Amory Black Beauty Ranch
Murchison, TX

Sara Amundson
Executive Director
Humane Society Legislative Fund
Washington, DC

Lori Andresen
President
Save Our Sky Blue Waters
Duluth, MN

Sara Andrews
Executive Director
Alliance for Animals and the Environment
Madison, WI

Kimberly Baker
Executive Director
Klamath Forest Alliance
Orleans, CA

Bettina Bowers
Animal Care Director
Walden's Puddle WREC
Joelton, TN

Ruth Brooks
President
Freedom Center for Wildlife Inc.
Cinnaminson, NJ

Nick Cady
Legal Director
Cascadia Wildlands
Eugene, OR

Christine Canaly
Director
San Luis Valley Ecosystem Council
Alamosa, CO

Linda Challeen
Director
Minnesota Humane Society
St. Paul, MN

Katie Cleary
President
Peace 4 Animals
Los Angeles, CA

Timothy J. Coleman
Executive Director
Kettle Range Conservation Group
Republic, WA

Teresa Telecky, PhD
Director, Wildlife Department
Humane Society International
Washington, DC

Ali Crumpacker
Director
The Fund for Animals Wildlife Center
Ramona, CA

Daryl Dejoy
Executive Director
Wildlife Alliance of Maine
Penobscot, ME

Natalynne DeLapp
Executive Director
Environmental Protection Information Center
Arcata, CA

Linda Dionne
Coordinator
Voices of Wildlife in NH
Concord, NH

Brooks Fahy
Executive Director
Predator Defense
Eugene, OR

Camilla H. Fox
Founder & Executive Director
Project Coyote
Larkspur, CA

Brenna Galdenzi
Executive Director
Protect Our Wildlife
Stowe, VT

Howard Goldman
Director
Friends of Animals and Their Environment
St. Paul, MN

Bruce Gordon
President
EcoFlight
Aspen, CO

Joanna Grossman, PhD
Federal Policy Advisor
Animal Welfare Institute
Washington, D.C.

Maureen Hackett, MD
President and Founder
Howling for Wolves
Hopkins, MN

Susan Harvey
President
North County Watch
Templeton, CA

Barbara Hodges, DVM, MBA
Veterinary Advisor
Humane Society Veterinary Medical Association
Washington, DC

Dr. Brian L. Horejsi
Speak Up For Wildlife Foundation
Penticton, British Columbia

Dr. Tom Huhnerkoch
Founder
Mountain Cats Trust
Lead, SD

Louise Kane, JD
Founder
Justice for Wolves
Eastham, MA

Delia G. Malone
Executive Committee Member
Sierra Club, Rocky Mountain Chapter
Denver, CO

Jarid Manos
Founder & CEO
Great Plains Restoration Council
PO Box 1206
Fort Worth, TX 76101

Ara Marderosian
Executive Director
Sequoia ForestKeeper
Kernville, CA

Buz Marthaler
Chairman
Wildlife Rehabilitation Center of Northern Utah
Ogden, UT

Roz McClellan
Director
Rocky Mountain Recreation Initiative
Nederland, CO

Angi Metler
Executive Director
Animal Protection League of New Jersey
Englishtown, NJ

Deborah Robbins Millman
Director
Cape Wildlife Center
Barnstable, MA

Janine Motta
Programs Director
Bear Education and Resource Group
Manalapan, NJ

Sharon Negri
Director
WildFutures
Berkeley, CA

Donna Olsen
Founder
Tri-City Ecology Center
Fremont, CA

Tehri Parker
Executive Director
Rocky Mountain Wild
Denver, CO

Debra Parsons-Drake
Senior Director
Animal Response, Care and Sanctuary
The Fund for Animals
New York, NY

Mike Petersen
Executive Director
The Lands Council
Spokane, WA

Jennifer Place
Program Associate
Born Free USA
Washington, DC

Patricia G. Randolph
Director
Wisconsin Wildlife Ethic-Vote Our Wildlife
Portage, WI

Bonnie Rice
Senior Representative
Our Wild America Campaign, Sierra Club
San Francisco, CA

Kirk Robinson, PhD
Executive Director
Western Wildlife Conservancy
Salt Lake City, Utah

Susan Russell
Co-Director
League of Humane Voters of New Jersey
Manalapan, NJ

Lesley Sampson
Founding Executive Director
Coyote Watch Canada
St. Davids, ON

Louise Shimmel
Executive Director
Cascades Raptor Center
Eugene, OR

Shelley Silbert
Executive Director
Great Old Broads for Wilderness
Durango, CO

Mark Smith
President
Nevada Wildlife Alliance
Incline Village, NV

Melissa Smith
Director
Friends of the Wisconsin Wolf & Wildlife
Madison, WI

Melissa Smith
Director
Great Lakes Wildlife Alliance
Madison, WI

Sarah B. Stewart
President
Animals Are Sentient Beings, Inc.
Cambridge, MA

Wally Sykes
Co-Founder
Northeast Oregon Ecosystems
Joseph, OR

Tabitha Tripp
Co-Chair
Heartwood
Bloomington, IN

Steve Pedery
Conservation Director
Oregon Wild
Portland, OR

Laura Hagen
Deputy Director of Advocacy
MSPCA-Angell
Boston, MA

Lisa Owens Viani
Director
Raptors Are the Solution
Berkeley, CA

Marilyn Weaver
Executive Director
The League of Humane Voters, Florida
Tarpon Springs, FL

Melanie Weberg
Director
League of Humane Voters, Wisconsin
Osceola, WI

Marla S. Wilson
Acting Executive Director
Humane Society Wildlife Land Trust
Washington, DC

Lisa Robertson
Board President
Wyoming Untrapped
Jackson, WY

Carson Barylak
Campaigns Officer
International Fund for Animal Welfare
Washington, D.C.

Sources:

¹ See, e.g., David Mattson, Ph.D., "<http://www.Grizzlytimes.Org/#!Honest-Science/C1ch8>". Eric Whitney, Montana Public Radio (4/16), "Biologist: Yellowstone Grizzlies Can't Afford any Increase in Mortality", <http://mtpr.org/post/biologist-yellowstone-grizzlies-cant-afford-any-increase-mortality#stream/0>.

² The Humane Society of the United States. "American Voters Oppose Delisting Greater Yellowstone Area Grizzly Bears from Endangered Species Act Protections," April 12, 2016: http://www.humanesociety.org/news/press_releases/2016/04/opposition-yellowstone-grizzly-delisting-041216.html?credit=web_id65489811

³ Szarek, Harmony. "Subjectivity in Expert Decision Making: Risk Assessment, Acceptability, and Cognitive Heuristics Affecting Endangered Species Act Listing Judgments for the Greater Yellowstone Ecosystem Grizzly Bear." Electronic Thesis or Dissertation. Ohio State University, 2015. Ohio LINK Electronic Theses and Dissertations Center. 11 Dec 2015.

⁴ U.S. Fish and Wildlife Service, "Endangered Species: Mammals: Grizzly Bear (*Ursus Arctos Horribilis*)," <http://www.fws.gov/mountain-prairie/es/grizzlyBear.php>, (2016).

⁵ Charles C. Schwartz, Sterling D. Miller, and M.A. Haroldson, "Grizzly Bear (*Ursus Arctos*)," in *Wild Mammals of North America: Biology, Management, and Conservation*, ed. G.A. Feldhamer, B.C. Thompson, and J.A. Chapman (Baltimore: Johns Hopkins University Press, 2003).

⁶ U.S. Fish and Wildlife Service, "Endangered Species: Mammals: Grizzly Bear (*Ursus Arctos Horribilis*)."

⁷ National Park Service. 2016. Yellowstone: Grizzly Bear Information: Population. <http://www.nps.gov/yell/learn/nature/gbearinfo.htm>.

⁸ Doak, D. F., and K. Cutler. 2013. Re-Evaluating Evidence for Past Population Trends and Predicted Dynamics of Yellowstone Grizzly Bears. *Conservation Letters* 10.1111/conl.12048; Mattson, D. 2016. <http://www.grizzlytimes.org/#!honest-science/c1ch8>.

- ⁹ 76 Fed. Reg. 42631 (July 19, 2011). See also <http://www.fws.gov/mountain-prairie/species/plants/whitebarkpine/> ("Threats to the whitebark pine include habitat loss and mortality from white pine blister rust, mountain pine beetle, catastrophic fire and fire suppression, environmental effects resulting from climate change, and the inadequacy of existing regulatory mechanisms.").
- ¹⁰ Angus M. Thuermer Jr. "Wyoming says grizzly hunting plan ensures bears forever," January 6, 2016: <http://www.wyofile.com/wyoming-says-grizzly-hunting-plan-ensures-bears-forever/>
- ¹¹ *Genetic diversity* increases a species' chances of long-term survival because negative traits (such as inbreeding) become widespread within a population when that population is left to reproduce only with its own members. *Genetic drift* refers to a population's loss of genes, making a population less vital, more disease prone, and unable to overcome natural disasters.
- ¹² See, for example: Wallach, A. D., I. Izhaki, J. D. Toms, W. J. Ripple, and U. Shanas. 2015. What is an apex predator? *Oikos* 124:1453-1461. Weaver, J. L., P. C. Paquet, and L. F. Ruggiero. 1996. Resilience and conservation of large carnivores in the Rocky Mountains. *Conservation Biology* 10:964-976. Wielgus, R. B., D. E. Morrison, H. S. Cooley, and B. Maletzke. 2013. Effects of male trophy hunting on female carnivore population growth and persistence. *Biological Conservation* 167:69-75. Creel, S., M. Becker, D. Christianson, E. Droge, N. Hammerschlag, M. W. Hayward, U. Karanth, A. Loveridge, D. W. Macdonald, W. Matandiko, J. M'Soka, D. Murray, E. Rosenblatt, and P. Schuette. 2015. Questionable policy for large carnivore hunting. *Science* 350:1473-1475.
- ¹³ R. B. Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence," *Biological Conservation* 167, (2013); W. J. Ripple et al., "Status and Ecological Effects of the World's Largest Carnivores," *Science* 343, no. 6167 (2014); A. D. Wallach et al., "What Is an Apex Predator?," *Oikos* 124, no. 11 (2015); Chris T. Darimont et al., "The Unique Ecology of Human Predators," *Science* 349, no. 6250 (2015); Jacinthe Gosselin et al., "The Relative Importance of Direct and Indirect Effects of Hunting Mortality on the Population Dynamics of Brown Bears," *Proceedings of the Royal Society B* 282, (2015).
- ¹⁴ C. T. Darimont et al., "Human Predators Outpace Other Agents of Trait Change in the Wild," *Proceedings of the National Academy of Sciences of the United States of America* 106, no. 3 (2009); Darimont et al., "The Unique Ecology of Human Predators."
- ¹⁵ Ibid.
- ¹⁶ Wielgus et al., "Effects of Male Trophy Hunting on Female Carnivore Population Growth and Persistence; Gosselin et al., "The Relative Importance of Direct and Indirect Effects of Hunting Mortality on the Population Dynamics of Brown Bears."
- ¹⁷ Ordiz, A., O. G. Stoen, S. Saebo, J. Kindberg, M. Delibes, and J. E. Swenson. 2012. Do bears know they are being hunted? *Biological Conservation* 152:21-28.
- ¹⁸ Zedrosser, A., F. Pelletier, R. Bischof, M. Festa-Bianchet, and J. E. Swenson. 2013. Determinants of lifetime reproduction in female brown bears: early body mass, longevity, and hunting regulations. *Ecology* 94:231-240.
- ¹⁹ McDonough, T. J., and A. M. Christ. 2012. Geographic variation in size, growth, and sexual dimorphism of Alaska brown bears, *Ursus arctos*. *Journal of Mammalogy* 93:686-697. See also Gosselin, et al. 2015.
- ²⁰ Gosselin, et al. 2015.
- ²¹ <http://nrmsc.usgs.gov/science/igbst/2015mort>
- ²² Schwartz et al.