Mr. Chris Servheen
c/o Grizzly Bear Recovery Program
College of Forestry and Conservation
U.S. Fish and Wildlife Service

March 24, 2016

Dear Mr. Servheen,

I am writing this letter to protest the proposal of the United Stated Fish and Wildlife Services to remove the Grizzly bear from the Endangered Species Act.

Last week, my undergraduate Wildlife Conservation class visited Yellowstone National Park for spring break. We had the incredible opportunity to view breathtaking scenery, numerous flora and fauna, and be educated on current topics with officials and local people. Of the issues that arose, the possible delisting of the Grizzly bear was one that caught my attention.

According the Endangered Species Act, to delist a species, a process to "assess populations and recovery achievements in eliminating or reducing threats" in addition to seeking peer reviews is required. Additionally, there are five factors the species must be reviewed under. I will seek to enlighten you as to how the Grizzly bear fails to meet the requirements necessary to delist.

1. *Is there a present or threatened destruction, modification, or curtailment of species' habitat or range?*
   Currently, the Grizzly bear (under review) resides in four states: Idaho, Montana, Washington and Wyoming. Within Yellowstone and Grand Teton national parks, the bears will continue to be managed by the National Park Service. However, as that only represents half of Grizzly bear territory, a large number of the bears are at risk. With delisting, the bears' habitat range will be modified into an unsafe territory. This will cause dispersal, higher levels of bear aggression, and more frequent human- bear encounters.

2. *Is the species subject to overutilization for commercial, recreational, scientific, or educational purposes?*
   The species is not subject to overutilization by humans, but represents an important keystone species, especially in the Greater Yellowstone region. Grizzlies and wolves have been deemed the main attractions in the park, and the rising nature related tourism is worth $1 billion annually. We currently utilize the bear population for profit in an eco-friendly and manageable way. Delisting the bears would threaten the ecotourism balance we have just acquired in the past decade.

3. *Is disease or predation a factor?*
   The main predator and reason for listing the Grizzly bear on the ESA is the human. Unfortunately, even with the "recovered" population, or rising numbers of bears, researchers in the Montana state Grizzly bear proposal agree that the grizzlies still have "low reproductive rates and that grizzly populations are very susceptible to human impacts". They continue to say that actual population numbers are almost impossible to detect, and they use population estimates instead. With these facts, how is it feasible to restart trophy sport hunting of the grizzlies? Especially if an increase in human-bear encounters has been shown to increase bear aggression toward people.

4. *Are there inadequate existing regulatory mechanisms in place outside the ESA (taking into account the efforts by the States and other organizations to protect the species or habitat)?*
   There are not adequate existing regulatory mechanisms taking place outside the ESA. For example, the state of Wyoming's plan states that they will not let the demographic of the bears drop below 500 individuals. This would mean the population could potentially lose at least 30% of its current members, not including the estimates that the population doubles every two years. That substantially decreases not only the current and future population but the genetic diversity as well.
   The goal of the Endangered Species Act is to recover individuals to a level where they can sustain their population and increase in numbers for the futures. The current proposal to delist encourages the reduction of the population to a precarious level.

5. *Are other natural or manmade factors affecting its continued existence?*

   Grizzly bears require a large territory, so the obvious deterrent is human's negligent use of space and inability to interact peacefully with the wildlife in the surrounding areas. If delisted, humans and their use of the land will only provide more of a barrier to grizzly bear movement and population growth.

It is also important to note that the Grizzly bear was unsuccessfully delisted in 2007 and returned only two years later to the Endangered Species Act because we failed to protect the species. Additional studies within Grand Teton National Park showed that the removal of Grizzly bears and wolves caused populations of herbivores to increase, decreasing the density of plants and decreasing the population of migratory birds. Do we really want to make the same mistake as we did with the wolves in Yellowstone? Can we afford to spend that money, time and manpower it will require to reinstate our perilous balance?

The final piece of delisting a species under the Endangered Species Act enlists peer review and comments from concerned citizens on either side of the argument. First, a published study by Ohio State University graduate student Kristin Szarek concludes that 60% of scientists believe that the Greater Yellowstone bears should remain under federal protection. Secondly, over 36 Native American tribes- including those in the Yellowstone region- signed a petition against delisting. Finally, here is my letter of appeal, coming from the opinion of a young undergraduate student. I do not want to see species disappear before I finish my education in time to make a career out of saving them.

Please consider your decision and the effects it would have on both wildlife and human populations.

Sincerely,



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