

From: rebecca_shoemaker@fws.gov on behalf of [Yellowstonegrizzlyplan.FW6](#)
To: robert.logan@cfc.umd.edu
Subject: Fwd: Protect Yellowstone's Grizzly Bears
Date: Wednesday, May 22, 2013 3:49:04 PM

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From: **Maria Erica Manzoni** <jaelle00@virgilio.it>
Date: Thu, May 16, 2013 at 12:18 PM
Subject: Protect Yellowstone's Grizzly Bears
To: Chris_Servheen@fws.gov

I am writing to convey my concerns over the proposed recovery plan for the Yellowstone grizzly bear population. The plan weakens the prospect of long-term recovery for this magnificent, threatened population.

It is especially important to give grizzly bears the protection they deserve -- they serve as a measure of the health of the broader ecosystem where they live. Protecting grizzly bears protects an array of other species.

The long isolated grizzly bears of Yellowstone need habitat protections that include larger wildlands connected to other grizzly bear ecosystems as far as Canada, where the most robust populations still survive. This vision cannot be achieved if this plan is adopted. In fact, implementing this plan will only exacerbate loss of genetic diversity and the problems associated with it.

The plan arbitrarily excludes areas that grizzly bears already occupy and those places that are biologically suitable for grizzly bears when designating suitable habitat. Grizzly bears live today in the Palisade, Wind River, Wyoming, Gravelly and Centennial mountain ranges. The Centennial and Gravelly mountains provide critical ecological connections between Yellowstone and other grizzly bear ecosystems -- the plan should be revised to include these wildlands in the designation of suitable habitat.

The plan also fails to address the destructive impacts climate change and human development have on grizzly bear populations. The climate-driven collapse of whitebark pine -- one of the most critical foods for Yellowstone grizzly bears -- over the past decade has severely contributed to population declines. Climate change, drought and nonnative fish predation has led to the loss of Yellowstone cutthroat trout. The revised recovery plan does not take into account these changes. Bears need additional habitat -- including those wildlands listed above -- to compensate for the loss of key foods in the Yellowstone's ecosystem.

The status of the Yellowstone population cannot be reliably assessed; grizzly bears are notoriously difficult to count. The U.S. Fish and Wildlife Service has resorted to indirect measures recently proven to be unreliable. While modest increases have probably occurred, thanks to federal Endangered Species Act protections, they have been fewer than advertised.

In fact, global warming and key food loss could be contributing to a decline in grizzly bear numbers. The Service should reevaluate the methods used to assess the status of grizzly bears in Yellowstone, rather than forging ahead with premature plans to remove federal endangered species protections. This population is clearly still at risk.

Finally, the plan fails to ensure necessary funding. There is no assurance that the \$3.7 million per year needed for management and monitoring will be provided. The lion's share of this work involves reducing human-caused conflicts and deaths.

I appreciate the opportunity to comment on this plan.

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