



P.O. Box 9175, Missoula, MT 59807 • (P) 406.542.2048 • wild@wildernesswatch.org • www.wildernesswatch.org

Board of Directors

Howie Wolke
President, MT

Gary Macfarlane
Vice-President, ID

Jerome Walker
Secretary/Treasurer, MT

Marty Almquist, MT

Janine Blaeloch, WA

Talasi Brooks, ID

Franz Camenzind, WY

Natalie Dawson, MT

Fran Mauer, AK

Senior Advisor

Stewart M. Brandborg

Executive Director

George Nickas

Advisory Council

Magalen Bryant
Dr. Derek Craighead
Dr. M. Rupert Cutler
Dr. Michael Frome
Dr. Roderick Nash

Minneapolis, MN Office

2833 43rd Avenue South
Minneapolis, MN 55406
(P) 612.201.9266

Moscow, ID Office

P.O. Box 9623
Moscow, ID 83843
(P) 208.310.7003

May 7, 2016

U.S. Fish and Wildlife Service
1849 C Street NW
Washington, DC 20240

Re: **Proposed Rule to Remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife.**

Dear U.S. Fish and Wildlife Service,

The following are comments from Wilderness Watch about the Proposed Rule to Remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife.

Wilderness Watch is a national wilderness conservation organization with members across the country, and offices in Montana, Idaho, and Minnesota. Wilderness Watch seeks to protect all the units in the National Wilderness Preservation System. Wilderness Watch opposes the proposal to de-list the Greater Yellowstone Ecosystem Grizzly Bears from the Endangered Species Act for the following reasons:

- The growth rate of the Greater Yellowstone Area (GYA) grizzly bear population has been flat since the early 2000s and fewer cubs and yearlings are surviving. The growth rate of the grizzly population has been flat since the early 2000s, apparently due at least in part to a decline in the survival of cubs and yearlings; more older bears and fewer cubs and young bears is not a good trend for maintaining a healthy population.

- Grizzly bears in the Yellowstone region are still completely isolated from other grizzly bear populations, both geographically and demographically, as they have been for 100 years. To maintain a healthy population over the long term and achieve true recovery, both male and female grizzly bears in the Yellowstone area need to be able to connect naturally with grizzlies from other populations. States are not likely to allow bears on the periphery of currently occupied habitat because that is where bears get into the most conflicts -- yet these are the very bears most likely to establish connections to other grizzly populations such as in

the Northern Continental Divide Ecosystem (NCDE).

- Existing state management plans are inadequate to protect Yellowstone grizzly bears or to allow them to connect to other grizzly populations. The GYA states (MT, WY, ID) have not committed to maintaining a stable to increasing grizzly bear population, and some state management plans (notably Wyoming's, which is home to the majority of grizzly bears in the region) will not allow them to disperse into new biologically-suitable habitat. Current state management plans do not have adequate protections for bears or their habitat in place to allow them to connect to other grizzly populations. All three states plan to initiate a sport hunt for grizzly bears immediately following delisting.
- Significant uncertainty exists about the long-term implications of the recent loss of traditional major grizzly foods, such as whitebark pine seeds, on the population. Because grizzly bears reproduce so slowly it takes a long time to discern trends, but we already know that more bears are dying as they increasingly use meat (livestock and hunter-killed carcasses) to replace traditional food sources, and come into more conflict with ranchers and hunters as a result.
- Courts have ruled that the U.S. Fish and Wildlife Service (FWS) must consider the overall recovery of the species as it was originally listed under the ESA, and not delist isolated 'segments' of the species one at a time. Grizzly bears throughout the lower 48 states, including the Greater Yellowstone population, were placed under the protection of the ESA in 1975 as a single entity due to their extremely low numbers. Today there are only two populations of any size in the lower 48 (GYA and NCDE) and they are isolated from each other. In the other four recovery areas, two have less than 50 bears and two have ten or fewer bears. Today, grizzlies occupy less than 2% of their historic habitat in the lower 48.

Please do NOT de-list the grizzlies as proposed.

Sincerely,



Kevin Proescholdt
Conservation Director