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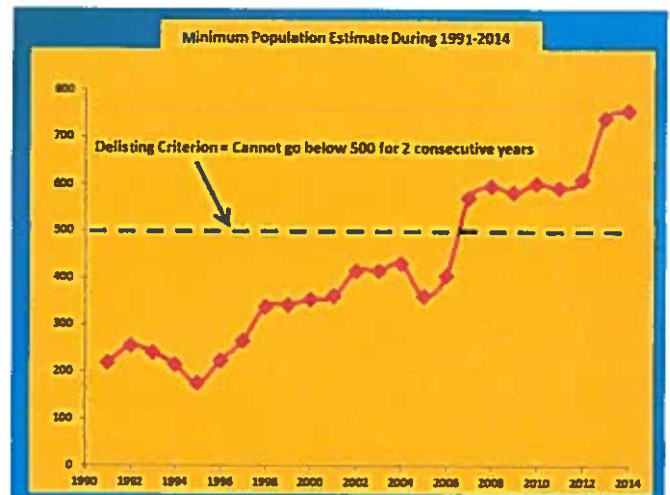
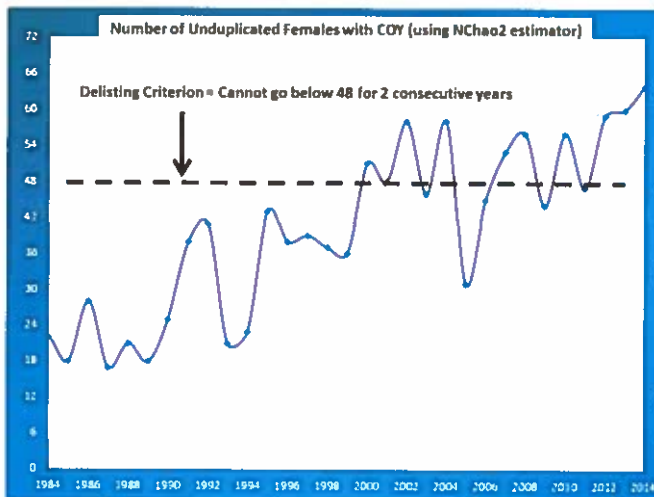
Bear Trust International's Comments about the Proposed Delisting of the Grizzly Bear Population in the Greater Yellowstone Ecosystem (Docket No. FWS-R6-ES-2016-0042)

Bear Trust International would like to congratulate the U.S. Fish and Wildlife Service for meeting the delisting criteria in the Recovery Plan for the Greater Yellowstone Ecosystem grizzly bear population. Bear Trust International fully supports the proposed delisting of this grizzly bear population based on the scientific data regarding the three Demographic Recovery Criteria discussed below.

Demographic Recovery Criterion #1

"Because 48 adult females with cubs of the year is equivalent to a population of approximately 500 total individuals (IGBC, p. 43), we are establishing a target number of 48 adult females of the year. This target number shall not go below 48 for any two consecutive years. For genetic reasons (Miller and Waits 2003, p. 4338) it is desirable that the total population of grizzly bears in the GYA be maintained above 400 bears. To assure that this goal is met and in order to adopt a conservative approach, the total population will be maintained at or above 500 grizzly bears. The estimate of 48 adult females with cubs of the year will be calculated by the IGBST based on model averaging described in the Supplement to the Reassessing Methods Document (IGBST 2006, pp.2-10)."

Bear Trust International has evaluated this criterion using data from the Interagency Grizzly Bear Study Team. As of April 12, 2016, we had access to data through year 2014. Data for year 2015 are still being processed and organized. Based on the data we evaluated, it is clear that both components of Demographic Recovery Criterion #1 were met in year 2008:



Demographic Recovery Criterion #2

"Sixteen of 18 bear management units within the Recovery Zone must be occupied by females with young, with no two adjacent bear management units unoccupied, during a 6-year sum of observations. This criterion is important as it ensures that reproductive females occupy the majority of the Recovery Zone and are not concentrated in one portion of the ecosystem."

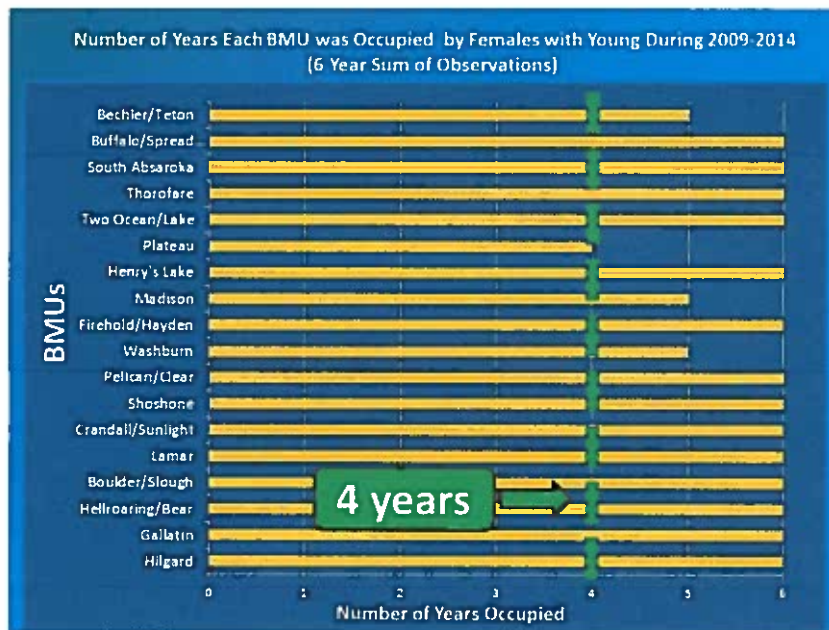
Bear Trust International has evaluated this criterion using data from the Interagency Grizzly Bear Study Team. As of April 12, 2016, we had access to data through year 2014. Data for year 2015 are still being processed and organized.

There are two rules that the Interagency Grizzly Bear Study Team use to evaluate Demographic Criterion #2:

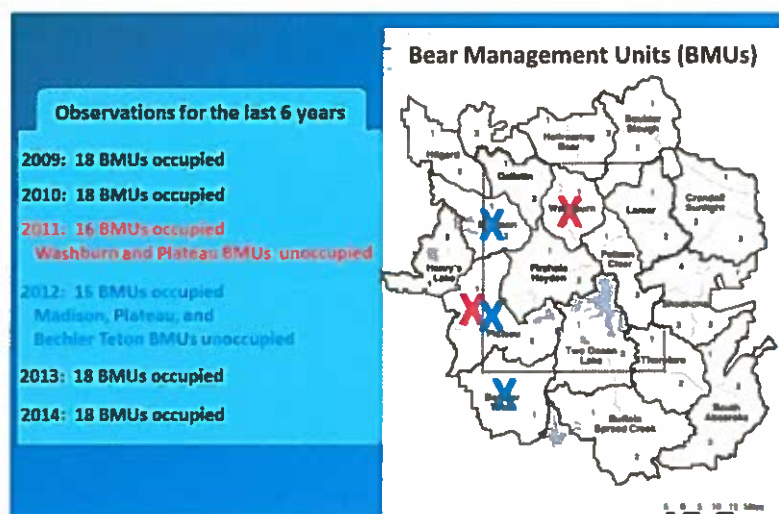
Rule 1: For 16 of the 18 Bear Management Units (BMU), there must be occupancy by females with young in at least 4 of the 6 years.

Rule 2: Two adjacent BMUs can be unoccupied during ONLY 1 of the 6 years.

Based on the data we evaluated, Rule 1 of Demographic Recovery Criterion #2 has been met:



Based on the data we evaluated, Rule 2 of Demographic Recovery Criterion #2 has been met:

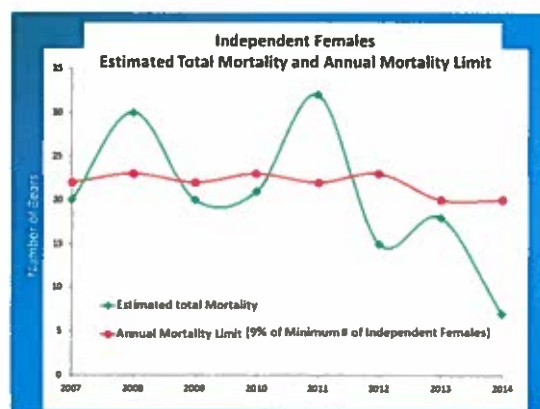


Demographic Recovery Criterion 3

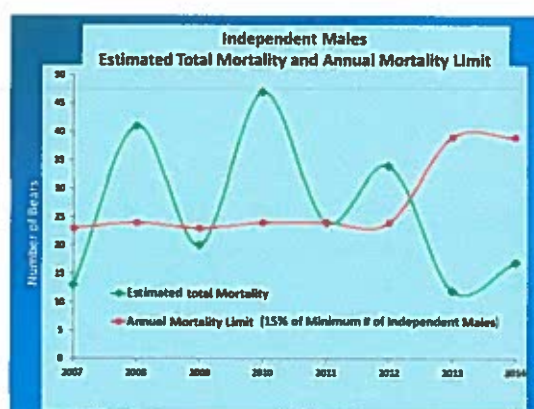
"For independent females (at least 2 years old), the current annual mortality limit, not to be exceeded in 2 consecutive years and including all sources of mortality, is 9 percent of the total number of independent females. For independent males (at least 2 years old), the current annual mortality limit not to be exceeded in 3 consecutive years and including all sources of mortality, is 15 percent of the total number of independent males. For dependent young (less than 2 years old), the current annual mortality limit, not to be exceeded in 3 consecutive years and including only known and probable human caused mortalities, is 9 percent of the total number of dependent young."

Bear Trust International has evaluated this criterion using data from the Interagency Grizzly Bear Study Team and based on the data we evaluated, it is clear that all three components of Demographic Recovery Criterion #3 were met prior to year 2007:

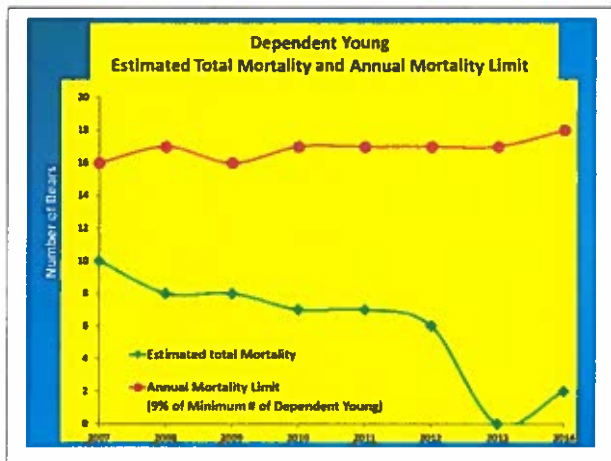
Independent Females:



Independent Males:

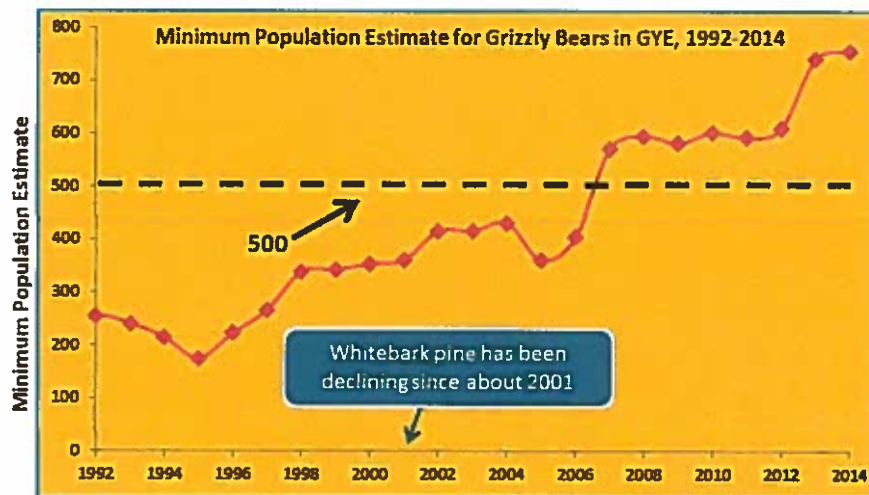


Dependent Young:



It is clear to us that all three Demographic Recovery Criteria for the GYE grizzly bear population have been met.

In 2011, the US Court of Appeals for the 9th Circuit upheld the lower court decision in 2009 to relist the GYE grizzly bear population as a Threatened species under the ESA because they were concerned about the potential impacts of the decline of whitebark pine on the GYE grizzly bear population. White bark pine has been declining since around 2001. If white bark pine had a negative effect on grizzly bear demographics, we should have seen a decline in the GYE grizzly bear population after 2001. Overall, the number of GYE grizzly bears increased from 361 bears in 2001 (minimum population estimate) to 757 bears in 2014 (minimum population estimate).



Nonetheless, given the concerns over potential effects of white bark pine decline on GYE grizzly bears, the Interagency Grizzly Bear Study Team (IGBST) conducted rigorous research to provide comprehensive knowledge about the state of white bark pine decline and GYE grizzly bear response. They scientifically evaluated the following 8 research questions:

1. *How diverse is the GYE grizzly bear diet?*
2. *Has grizzly bear selection of whitebark pine habitat decreased as cumulative tree mortality increased?*
3. *Has grizzly bear body condition decreased as whitebark pine declined?*
4. *Has animal matter provided grizzly bears with an alternative food resource to declining whitebark pine?*
5. *Have grizzly bear movements increased during the period of whitebark pine decline?*
6. *Has the number of human-caused grizzly bear mortalities increased as whitebark pine resources declined?*
7. *Has home range size increased as grizzly bears sought alternative foods, or, alternatively, has home range size decreased as grizzly bear DENSITY increased?*
8. *Are changes in vital rates (e.g., cub survival, reproduction, etc.) during the last decade associated more with decline in whitebark pine resources than increases in grizzly bear density?*

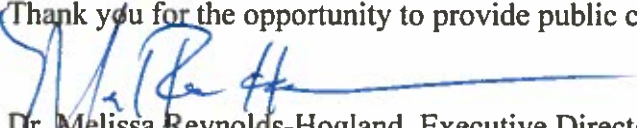
To evaluate these questions, the IGBST researched 44 published papers, 12 books, 4 dissertations, 10 theses, 66 state and federal agency reports that documented grizzly bear food habits in GYE during 1891-2012, and conducted additional field studies. They analyzed over 52,000 locations of GPS-collared grizzly bears in GYE during 2000-2011.

Their major findings:

- GYE grizzly bears exhibit substantial diversity in diet, both seasonally and spatially.
- GYE bears have demonstrated the ability to shift major food items in their diet as availability of foods change.
- Body condition of GYE bears has not decreased as whitebark pine has declined
- Changes in vital rates were more likely due to increased density of the bear population

These conclusions indicate that the GYE grizzly bear population is minimally effected by the decline of white bark pine. For this reason, and because the GYE grizzly bear population has met all 3 Demographic Recovery Criteria, we support the USFWS proposed delisting. We have read the draft conservation strategy and believe it to be sound.

Thank you for the opportunity to provide public comment on this historic delisting proposal,



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Bear Trust International is a non-profit conservation organization founded in 1999 and based in Missoula, MT with a mission to help conserve all 8 bear species worldwide, other wildlife, and habitat. To this aim, we focus on the following programs: 1) Science-based education, 2) Research, 3) Habitat conservation, 4) Wildlife management, and, 5) Conservation policy.