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Dear

I strongly oppose the delisting of the Yellowstone Grizzly bears.

These iconic Ambassadors of Yellowstone require and deserve the full protection of the Endangered Species Act. While significant strides have been made during the past 40 years, under The Grizzly Bear Recovery Program, their numbers do not support delisting. With the continued threat of human encroachment resulting in habitat destruction, climate change, high mortality rates due to human causes, and loss of key foods delisting would prove a death knell for Grizzlies.

Further, delisting would put the fate of the Grizzlies' in the hands of Idaho, Montana and Wyoming - states who are anti-predator in history and ideology. These states would allow hunting which would result in a bounty on every Grizzly's head. We do not want to see the likes of Trophy Hunters such as "Walter Palmer" taking these magnificent and beloved bears as Trophies. Bear 399 is cherished by millions who come to Yellowstone to see her and her offspring each year. These nature and animal lovers are a valuable revenue source to the Park and the surrounding communities. Hunting outfits already have a bounty on 399's head. Grizzly Bears are not Trophies! They are vital to a healthy ecosystem, are sacred among the American Indian Tribes and are beloved icons of our country.

Please do not delist the Yellowstone Grizzlies.

Thank you.

Mary Jo Cook

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Div. of Policy, Perf. &
MGMT. Programs

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I am deeply disturbed to learn today that the U.S. Fish and Wildlife Service has formally proposed stripping Endangered Species Act protections from the Greater Yellowstone grizzly bear population. Here are six reasons why that's a dangerous proposal which threatens to undermine four decades of successful grizzly bear conservation in the Yellowstone ecosystem.

Reason #1. Population growth has stagnated since the early 2000's and has even been in decline in recent years. Most recently in fact, the Yellowstone grizzly population declined by 43 bears in 2015 alone, representing a massive 6% population decline in a single year. The USFWS has argued that the population growth has stagnated because the population has reached "carrying capacity." In reality, what's happened is the bears major food sources are in a state of disaster and more bears are roaming more widely in search of different foods and getting killed by humans in the process.

Reason #2. Many of the most important food sources for Yellowstone grizzlies have suffered catastrophic declines in recent years. The nuts of the whitebark pine tree, for instance have long been regarded as the single most important food source for grizzlies, providing a much needed caloric boost going into hibernation, especially for females with cubs. During years of good whitebark cone production, bears stay in the high country during the fall and are much less likely to come into conflict with people. In the last two decades, the whitebark pine stands in the ecosystem have been decimated by blister rust and a pine beetle epidemic (driven by climate change) which has killed most of the mature whitebark pine trees in the ecosystem. Another important food source, the cutthroat trout of Yellowstone lake and its tributaries, has also experienced massive declines due to predation from non-native lake trout. There are further questions about another important food source, the army cutworm moths, which migrate to the ecosystem's highest mountains during the summer from agricultural lands on the great plains where they are threatened by heavy pesticide use.

Reason #3. Grizzly bears are already dying in record numbers. In 2015 alone, a record 59 grizzlies were known to have died in the ecosystem, the vast majority of which were human caused (killed by hunters, "management removals", etc). What is even more concerning is that 2015 is by no means an outlier year. Known and probable mortalities have exceeded 50 bears for 3 out of the last 6 years, often violating the government's own mortality limits. This increased mortality is often spun by USFWS as the natural result of more bears in the population. The problem with this is that the grizzly population has not increased substantially since the early 2000's, according to their own data. However, this increased level of mortality is directly correlative to the decline in whitebark pine trees and cutthroat trout. Recent research has suggested that bears are compensating for the loss of those food sources by relying more heavily on meat. Much of this increase in meat comes in the form of livestock depredation and scavenging hunter-killed animals; two behaviors that often result in the death of the bear. Delisting the bear now will only increase the number of dead bears.

Reason #4. Yellowstone's grizzlies have had zero genetic connectivity with outside populations in the last 100 years. This means that every grizzly in the Yellowstone

population today came from a gene pool of only 136 animals (the population low point in 1975). A wildlife population will not survive in the long term without genetic connectivity to promote genetic diversity and avoid the damaging effects that inbreeding can have on a wildlife population. Establishing corridors to allow bears to move between populations in Yellowstone and Glacier will require more protection, not less. Genetic connectivity is an absolute necessity if the Yellowstone grizzly is to survive in the long term and this prospect becomes much more difficult in the absence of ESA protections.

Reason #5. The removal of protections for grizzlies also removes many crucial habitat safeguards. Grizzlies are a true wilderness animal and are dependent on large swaths of undeveloped land. When grizzlies were listed under the ESA, many logging, oil/gas, and tourist developments were stopped to protect the bear. Without protections, these habitat safeguards are removed, and many acres of pristine land in the ecosystem could be opened up to development.

Reason #6. The vast majority of Yellowstone grizzly experts are opposed to delisting. According to recent research, nearly 2 in 3 grizzly bear researchers experienced with the Yellowstone population believed delisting would be the incorrect decision, given the multitude of threats bears still face. Indeed, the pre-eminent Yellowstone grizzly researcher in the world, Dr. David Mattson, has come out forcefully opposed to delisting. Mattson, who has researched Yellowstone grizzlies for the USGS for decades and been the lead author on dozens of scientific papers on Yellowstone bears, recently wrote that we should "put the brakes on the rush to delist Yellowstone's grizzly bear population until we have a more reliable picture of what's going on, produced by a more reliable and independent process of inquiry."

Reason #7. State management of grizzlies could lead to disastrous consequences for the population. Removing federal protections for grizzlies means that the states of Wyoming, Montana, and Idaho will have management authority. The state of Wyoming (of which I am a resident), which holds the vast majority of the ecosystem's grizzlies, has proven itself incapable of managing large carnivores in any scientific manner. The same state that has had its vicious wolf management plan struck down in federal court not once, but twice.... The same state that recently saw its legislature propose legalizing the barbaric practice of mountain lion trapping..... That state now wants to take a shot at the grizzly. The three states allowed grizzly bear hunting right up until the time that grizzlies were listed in 1975, when the population was in a state of disaster. The Wyoming management plan calls for a population of 500 animals; that's 200 fewer than currently exist. A logical person can deduce how the state intends to achieve that objective. Additionally, the Wyoming plan effectively draws a line in the map, saying "no grizzlies past here", excluding the bear from large swaths of suitable habitat in the ecosystem like the Wyoming range and the southern Wind River range. It's worth noting that the bears favorite food source, the whitebark pine, is actually faring much better in those colder ranges in the ecosystem. If Wyoming has management, bears would not be able to access these areas. All three states are also chomping at the bit to offer grizzly bear "trophy hunts." Given that Yellowstone's grizzlies are already dying in record numbers, the prospect of adding to that with a grizzly bear trophy hunt is a disturbing and unconscionable idea.