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Endangered and Threatened Wildlife and Plants; Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears From the Federal List of Endangered and Threatened Wildlife

Comment On: FWS-R6-ES-2016-0042-0001

Endangered and Threatened Wildlife and Plants: Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife

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Submitter Information

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General Comment

See attached file(s)

Attachments

JSchmitt_Proposed Rule comments_2016

I am writing to express major concerns over the Proposed Rule for delisting of the Yellowstone grizzly bear population and its potential future implications for mismanagement by State wildlife management agencies when federal protections are removed. My categories of concern include:

- **Connectivity:** Natural movement of bears between the Greater Yellowstone (GYE) and Northern Continental Divide (NCDE) ecosystems is paramount for long-term persistence of the grizzly bear population. As grizzly bears in the GYE have expanded their range in recent decades, the gap between the NCDE and GYE populations has narrowed, giving promise to the eventuality that, with time, the exchange of genetic material between the populations can occur naturally. However, with the proposed plans to allow non-discretionary killing of grizzly bears that wander outside the Demographic Monitoring Area (DMA), the likelihood for successful dispersal is squandered. Those Yellowstone bears that risk exploring outside the DMA are the very ones who hold the most promise to connect with the NCDE; yet they are also most likely to die before the chance for connectivity can ever take root. State management predicated on partitioning mortalities by state shows the complete lack of comprehension by state wildlife managers of population genetics, population dynamics, or anything even remotely close to the concept of an ecosystem and is anathema to development of any functional notion of connectivity. These kinds of anachronistic views of “managing” bears by numbers are a sorry relic of the failed North American Wildlife Management Model, a management strategy that predates the discovery of DNA, the science of ecology, and advances in mathematical modeling. It is touted as a success only because its adherents suffer collectively in the delusional echo-chamber of shifting baselines syndrome. This method of purported management is akin to treating bears like coins in the bank and is conceptually and scientifically bankrupt
- **Mortality Management Discrepancies between Proposed Rule and Conservation Strategy:** There are significant and disturbing discrepancies in the language pertaining to mortality management in the Proposed Rule (PR) versus Chapter 2 (*Population Standards and Monitoring*) of the Conservation Strategy (CS). In particular, a significant discussion of mortality management in the PR (p. 13203-4) is simply non-existent in the CS. This discussion includes significant details that provide definitions of total, background, and discretionary mortalities, gives clarifying examples specifying exactly how these mortalities are to be calculated, and provides details regarding the process for determining how many bears would be available for hunting. Also, Appendix P which is the memorandum of agreement (MOA) between the states of Idaho, Montana, and Wyoming regarding the management and allocation of discretionary mortality is simply missing from the CS. The expectation that any substantive assessment can be provided when this important document is missing strains credulity and essentially eliminates the ability of informed citizens to examine and comment on the content of this MOA. The Conservation Strategy will be the salient go-to document for grizzly bear management well into the future. These important details are necessary to ensure that through time (as administrative personnel changes) the application of mortality thresholds is consistently adhered to. The language between the PR and the CS, especially as it pertains to mortality management, should match. These major discrepancies and the lack of State Plans defy the necessary regulatory mechanisms that must be in place for delisting to occur.

- Hunting:** Hunting and livestock allotments account for the overwhelming majority of all human-caused grizzly bear mortalities in the GYE. IGBST data indicate that out of 316 human-caused grizzly bear mortalities between 2000 and 2014, 150 (47%) were hunting-related, and 50 (16%) were livestock-related, collectively accounting for 63% of all human-caused grizzly bear mortality. IGBST data also show that of 206 known bear mortalities between 2009 and 2013, 146 were human-caused and of those, 58 (40%) were hunting-related. Hunting contributes to more documented mortalities than any other cause. By engaging in stealth behavior while hunting game in bear habitat, hunters kill, directly and indirectly, a substantial number of bears. Until wildlife managers eliminate hunter-caused bear deaths, hunting will remain an unaddressed excessively large, long-term, persistent, non-selective mortality sink for the GYE grizzly bear population. Adding trophy hunting as another contributor to bear mortality is unjustifiable on both scientific and ethical grounds. Trophy hunting is a major economic driver of the global market for animal body parts, contributing to extirpation of large-mammal populations in many areas of Africa and Asia, including Asian bear populations. Employing trophy hunting of grizzly bears in the GYE not only reduces an intelligent, behaviorally complex animal to a commodity, but also lends support to the economic objectification of rare animals that contributes to their extinction globally. Rather than be killed for trophies, “problem” bears in the GYE should be humanely euthanized and used to further our understanding of bear biology and not hung as trophies on the wall of elitist hunters. It is time to come to terms with the fact that hunting is a demographically withering pastime and hunters constitute a very small minority of the American public.
- Delisting process:** What could have potentially been a celebration of conservation success for the grizzly bear has been rendered an empty victory due to the hasty, disorganized, secretive, and incomplete nature of the delisting process. Those citizens who want to believe that the Federal and State management partners are acting for the long-term benefit of the grizzly bear are instead disillusioned by the lack of communication and organization between the various entities. It can only be surmised that artificial deadlines due to political considerations have trumped what should be a careful and deliberate process.
- Mortality Thresholds at Carrying Capacity:** Another item of deep concern is the inconsistent portrayal of the exact mortality thresholds if and when the population dips below 674 individual bears. According to Table 1 of the Proposed Rule (p. 13188), the mortality threshold for independent females and dependent young would be less than or equal to 7.6%. However, appended to this same Table is a footnote referencing Dan Ashe’s (Director, U.S. Fish and Wildlife Service) letter to the State Directors that clearly states that the mortality threshold would be less than 7.6% (NOT less than or equal to 7.6%). This statement by Dan Ashe is contradicted by Table 1. To remedy this contradiction, perhaps the column for less than or equal to 674 bears should be restructured as two columns: 1) one with a mortality threshold of 7.6% when the population reaches exactly 674, and 2) a second column specifying a threshold of less than 7.6% when the population estimate is below 674 bears. This is a subtle but potentially significant disparity. As they say, the devil is in the details. As someone who has taught courses

on extinction processes, I understand that a population at carrying capacity becomes intrinsically less stable. The stated goal of managing the bear population at 674 is based on the population estimate corresponding to carrying capacity; and hence, the thresholds at and below this point need to be clearly spelled out in both the Proposed Rule and Chapter 2 of the Conservation Strategy. As currently presented in Table 1 of the Proposed Rule and Table 2 of the Conservation Strategy (p. 36), the less than or equal to 7.6% value for mortality threshold of independent females and dependent young provides the opportunity for State managers to drive the population well below the stated goal of 674 bears by maintaining a fixed 7.6% mortality threshold independent of declining population size.

Thank you for the opportunity to comment on the Proposed Rule.

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