

The Greater Yellowstone Ecosystem Grizzly Bear Population Should Not Be De-Listed

The U.S. Fish and Wildlife Service (FWS) proposal to remove the Greater Yellowstone Ecosystem (GYE) grizzly bears from the Endangered Species Act (ESA) is premature as the GYE grizzly bear population is neither recovered nor sustainable. The Humane Society of the United States urges the FWS to retain protections for the GYE grizzly bears because the best available science shows they remain threatened per the ESA listing factors. 16 U.S.C. § 1533(a)(1).

Grizzly Bears are Not Recovered.

- Grizzly bears once ranged from northern Mexico to Alaska—perhaps as many as 50,000 in the lower 48 in the early 1800s¹—before humans largely killed them off.²
- Today, wild grizzly bears number at best between 1,400 and 1,700 bears in the lower 48 states³ of which only 674 to 839 were believed to be in the GYE in 2014.⁴ Even that small number may be an over-count, according to some biologists.⁵



Delisting is Scientifically Unjustified.

- When asked, 60% of prominent grizzly bear scientists “believe delisting would be an incorrect decision, or at the very least a violation of the precautionary principle.”⁶
- The continuing decline of important food sources for grizzly bears, including whitebark pine, cutthroat trout, and huckleberries, have caused grizzly bears to switch to a more meat-based diet. This switch has led to increased conflict with humans and greater aggression on bears (particularly cubs) from larger bears or wolves.
- Human-caused mortality is the single largest contributor to grizzly bear deaths.⁷
- Climate change will compound existing harms to grizzly bears by potentially eliminating even more staple foods – like army cutworm moths – which are dependent on fragile and rare alpine habitats from the landscape, altering hibernation duration, and accelerating the spread of disease.

Delisting will Further Isolate the GYE Population.

- Humans largely extirpated grizzly bears from the lower 48 by the 1920s and 1930s by hunting and appropriating their habitat.⁸
- The GYE grizzly bear population lives in and around Yellowstone National Park, Grand Teton National Park, federal forest service lands, and other public and private land in Wyoming, Montana, and Idaho.⁹ This population is the most isolated remnant population and is small consisting of 136 bears.¹⁰
- Bears outside the current population’s core habitat area will be vulnerable to hunting and retaliatory killing without the benefit of the federal government monitoring the numbers of kills.
- These mortalities could include individuals who provide vital connections between GYE and other grizzly bear populations. These mortalities impede much-needed genetic interchange between populations.

Grizzly Bears are Not Resilient to Human Persecution.

- Hunting bears during the fall when they are eating heavily to gain weight for hibernation costs them precious energy.¹¹ This cost early in a female’s life may negatively impact a lifetime of reproduction.¹²
- The time when bears emerge from their dens is never static from year-to-year, thus trophy hunters may take females when they have newborn cubs.¹³
- Hunting directly affects population growth rates and can indirectly affect sex and age structure of a population and change social organization.¹⁴ Hunting causes greater changes in a population than do natural processes.¹⁵
- Opening a hunting season will increase the numbers of bears killed by poachers too.¹⁶ Without radio collars, grizzly bear management agencies would be unaware of one-half (46 to 51 percent) of the killings that occur; therefore, managers need to incorporate unreported killings into their matrix if they hold hunting seasons.¹⁷
- The FWS should establish a no-hunting buffer zone around the perimeter of the parks.



- Allowing the trophy hunting of GYE grizzly bears will increase mortalities that the FWS failed to consider. For instance, when dominant park males wander out or are lured out of safe bounds and are killed for a trophy, new males will move into their former territories and commit infanticide on the previous sire's cubs in the park which lead to increased mortalities and population-wide reductions.¹⁸
- Famous female bears like F399, who are habituated to humans, will be some of the first bears shot by trophy hunters because they also live on the park boundaries. Their deaths will create an unwanted public backlash for the FWS similar to the death of wolf 832F, the alpha female of the Lamar Pack, one of Yellowstone's most famous and visible wolves, killed by a trophy hunter.¹⁹

The GYE Grizzly Bear Population Contributes Significantly to the Local Economy.

- Millions of grizzly-bear-watching tourists spend tens of millions of dollars each year benefitting the local economies of the Northern Rockies. With the loss of its bears, the Yellowstone National and Grand Teton national parks could lose close to \$10 million tourism dollars annually.²⁰

State Management Will Lead to Trophy Hunting.

- The rush to remove federal protections will quickly lead to state managers opening hunting seasons on GYE grizzly bears. Idaho, Montana, and Wyoming wildlife managers—who so poorly managed wolves in the eyes of multiple federal judges²¹—will be calling the shots for grizzly bears if delisting occurs.
- These state managers will also decide what types of hunting methods will be allowed. We must fight off any attempt to allow cruel and unsporting methods, such as hunting over bait and chasing bears with packs of GPS-collared hounds.
- State decision-makers have been too beholden to special interest groups—ranchers, outfitters and guides, trophy hunters and gun clubs—to be trusted to make the best, science-based decisions.



The HSUS urges the FWS to withdraw its proposal to delist the GYE grizzly bear population as it is premature to de-list this population as it has not met the recovery goals under the ESA.

Sources:

¹ <http://www.fws.gov/mountain-prairie/es/grizzlyBear.php>

² Schwartz, C. C., S. D. Miller, M. A. Haroldson. 2003. Grizzly Bear (*Ursus arctos*) in Wild Mammals of North America: Biology, Management, and Conservation. Johns Hopkins University Press, Baltimore, Maryland.

³ <http://www.fws.gov/mountain-prairie/es/grizzlyBear.php>

⁴ <http://www.nps.gov/yell/learn/nature/gbearinfo.htm>

⁵ Doak, D.F. and K. Cutler. 2014. Re-Evaluating Evidence for Past Population Trends and Predicted Dynamics of Yellowstone Grizzly Bears. *Conservation Letters* 7(3):313-322.

⁶ Szarek, Harmony. "Subjectivity in Expert Decision Making: Risk Assessment, Acceptability, and Cognitive Heuristics Affecting Endangered Species Act Listing Judgments for the Greater Yellowstone Ecosystem Grizzly Bear." Electronic Thesis or Dissertation. Ohio State University, 2015. OhioLINK Electronic Theses and Dissertations Center. 11 Dec 2015.

⁷ Schwartz et al. 2003

⁸ Schwartz et al. 2003

⁹ <http://www.nps.gov/yell/learn/nature/bearesa.htm>

¹⁰ <http://www.nps.gov/yell/learn/nature/bearesa.htm>

¹¹ Ordiz, A., O. Støen, S. Sæbø, J. Kindberg, M. Delibes, J. Swenson. 2012. Do bears know they are being hunted? *Biological Conservation* 152 (21-28)

¹² Zedrosser, A., F. Pelletier, R. Bischof, M. Festa-Bianchet, J. Swenson, . 2013. Determinants of lifetime reproduction in female brown bears: early body mass, longevity, and hunting regulations. *Ecology* 94(1)

¹³ See, e.g., Thomas D. Beck et al., "Sociological and Ethical Considerations of Black Bear Hunting," *Proceedings of the Western Black Bear Workshop* 5, (1995).

¹⁴ Gosselin, J. A. Zedrosser, J. Swenson, F. Pelletier, 2015. The relative importance of direct and indirect effects of hunting mortality on the population dynamics of brown bears. *Proceedings of the Royal Society of London B: Biological Sciences*. 282 (1798).

¹⁵ Woodroffe and Ginsberg 1998, Ligerg et al. 2012 quoted in Zedrosser et al. 2013

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¹⁷ McLellan, B. N., F. W. Hovey, R. D. Mace, J. G. Woods, D. W. Carney, M. L. Gibeau, W. L. Wakkenin, and W. F. Kasworm. 1999. Rates and causes of grizzly bear mortality in the interior mountains of British Columbia, Alberta, Montana, Washington, and Idaho. *Journal of Wildlife Management* 63:911-920.

¹⁸ Wielgus, R. B. and F. L. Bunnell. 1994a. Dynamics of a small hunted brown bear population in southwestern Alberta, Canada. *Biological Conservation* 67:161-166;

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¹⁹ http://www.nytimes.com/2012/12/09/science/earth/famous-wolf-is-killed-outside-yellowstone.html?_r=0

²⁰ Wilkinson, Todd. 2015. What's Next for Yellowstone's Grizzlies? *National Geographic*. October 1.

²¹ Fleisher, John. 2014. Federal judge: Great Lakes wolves return to endangered list. *Detroit Free Press*. December 23.



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