



# THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

10 May 2016

Public Comments Processing  
Attn: Docket No. FWS-R6-ES-2016-0042  
United States Fish and Wildlife Service  
MS: BPHC  
5275 Leesburg Pike  
Falls Church, VA 22041-3803.  
Submitted online at: [www.regulations.gov](http://www.regulations.gov)

**RE: Endangered and Threatened Wildlife and Plants; Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife; Proposed Rule**

Dear Sir/Madam,

The Wildlife Society (TWS), founded in 1937, represents nearly 10,000 professional wildlife biologists and managers dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation.

As diligent proponents for the use of sound science in decision-making, TWS would like to express our support for the above-referenced U.S. Fish and Wildlife Service (FWS) Proposed Rule to identify the Greater Yellowstone Ecosystem (GYE) population of grizzly bears (*Ursus arctos horribilis*) as a distinct population segment (DPS) and remove it from the federal list of endangered and threatened wildlife species under the Endangered Species Act of 1973, as amended (ESA, 16 U.S.C. 1531-1544).

As described in our Final Position Statement on Delisting Grizzly Bears in the Greater Yellowstone Area, TWS recognizes grizzly bear management and research efforts in GYE as a model for how state and federal cooperation, along with the development and application of sound science, can reverse the decline of even a controversial species with large landscape-level habitat requirements.

The population of grizzly bears in GYE was rapidly declining by 1975 when the species was appropriately listed as “threatened” under ESA. In the ensuing 41 years, state and federal resource managers and biologists have worked cooperatively to develop a framework for recovery and have implemented that framework in GYE more effectively than in any of the other five grizzly bear recovery areas identified in the national Grizzly Bear Recovery Plan. As mandated by ESA, the Recovery Plan identifies population and habitat management goals within the GYE population that define recovery and would permit delisting when achieved.

Cooperative efforts by state and federal resource management agencies also resulted in development of a Conservation Strategy that identifies important habitat protections, regulatory mechanisms, monitoring, and research designed to ensure continued security of a delisted grizzly bear population in GYE. As a result of effective on-the-ground implementation of the Recovery Plan and Conservation Strategy, the grizzly bear population in GYE has consistently exceeded all recovery targets as established in the Recovery Plan.

Moreover, TWS agrees with the FWS finding that the GYE population of grizzly bears satisfies the requirements of a “distinct population segment” (DPS) under ESA: The GYE grizzly bear population is both physically *discrete* from other grizzly bear populations and *significant* to the remainder of the taxon. As a DPS, the GYE grizzly bear becomes a listable entity under ESA. Since the DPS of grizzly bears in GYE no longer meets the definition of an endangered or threatened species under ESA, it should be delisted.

The GYE grizzly bear population is likely one of the most studied and monitored wildlife populations on earth and the best understood of any bear population. Even with this exceptional level of information, it is impossible to predict with certainty what impacts future events might have on this population of grizzly bears, other wildlife, or their habitats. This should not preclude delisting of the DPS of grizzly bears in GYE, however, as that would represent an insurmountable barrier for delisting any species and would violate the intent of ESA to delist a species once biologically sound recovery targets are achieved.

We fully expect State agencies to continue to follow the management and monitoring protocols outlined in the Conservation Strategy and their respective state management plans to ensure the continued viability of the GYE grizzly bear population. TWS endorses post-delisting monitoring and review mechanisms that ensure this recovered population does not deteriorate, and encourages states to take all necessary measures to halt any unanticipated declines. Furthermore, FWS should not hesitate to reinstate protections under ESA if the GYE grizzly bear population falls below long-term population viability parameters established by the Interagency Grizzly Bear Study Team. Once this delisting action is complete, we urge FWS to focus renewed attention on the other five grizzly bear recovery areas in the United States, and where appropriate, apply the successful model that has resulted in recovery of the GYE grizzly bear population to other recovery areas.

Thank you for considering the recommendations of wildlife professionals and for incorporating sound science into ESA decision-making. Please contact Keith Norris, AWB®, Director of Government Affairs & Partnerships at [keith.norris@wildlife.org](mailto:keith.norris@wildlife.org) or (301) 897-9770 x309 if you require further information or have any additional questions.

Sincerely,



Gary Potts, CWB®  
President