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To: Director Daniel M. Ashe
U.S. Fish and Wildlife Service
1849 C Street NW, Room 3358
Washington, District of Columbia, 20240-0001

November 10, 2015

OPEN LETTER re: Request for a definitive GYE grizzly bear survey using DNA hair analysis

Dear Director Ashe,

This past week I attended the Yellowstone Ecosystem Subcommittee of the Interagency Grizzly Bear Committee.

At the meeting it became clear that nobody, and I do mean nobody, has a clear idea of how many grizzly bears there are in the Greater Yellowstone Ecosystem.

The Interagency Grizzly Bear Study Team, which is charged with establishing the official count of the grizzly population, announced that the count for 2015 is 714, down 6 percent from 757 bears in 2014.

While 714 seems like a definitive number, it is not.

The IGBST establishes its official count using a methodology known as Chao2. Like most methodologies it has a margin of error. Chao2 says “we believe there are approximately 714 bears, but there might be as few as 638, and there might be as many as 793”.

So already we have a possible spread of 155 bears.

IGBST says that Chao2 is biased low and becomes less accurate over time. This week, team leader Frank Van Manen said that he *believes* that “we are underestimating by about 40 percent.”

So are there 638 or 714 or 793 or 1,110 (793 + 40 percent) grizzlies? No one knows with any certainty and now we have a spread of 472 bears.

At this point IGBST’s “best available science” starts looking more like a wild-ass guess.

How can you defend the ESA’s and the USFWS’s mandate to use the “best available science” when even the folks who do the counting freely admit that their estimates become less accurate with each passing year and may be off by as much as 40 percent?

Without a definitive number, the intentions of the ESA are subverted. If no one knows with an acceptable level of confidence what the actual population is then intelligent debate is impossible and decision-making becomes guesswork. The population count needs to be an established fact, not a flexible fiction.

Currently, delisting discussion is reduced to a clash of poorly informed opinion. Agency directors, environmental organizations, the press, and the public are all free to use the numbers that best suit their agendas, simply because the current methods are ambiguous.

This problem will persist after delisting.

After all, how can anybody, with any certainty, presume to monitor what is happening to the grizzly population *after* delisting, if no one can say, with any certainty, what the population was *at* delisting?

There is a far better alternative to the chaotic situation described above: a survey of the GYE grizzly population using DNA hair analysis.

Alberta has successfully used this non-invasive methodology on a landscape scale.

IGBST's parent agency, the USGS, is familiar with this methodology. They have done this type of work in Montana and they helped Alberta set up its DNA grizzly monitoring program, which many believe represents the best available science.

Funny that we advised Alberta on using this technique, but don't use it ourselves in the GYE.

And remarkable that Alberta found they had 2.5 times the number of bears than they had previously estimated, with a confidence factor that actually inspired confidence, not derision.

You could probably justify the investment in a DNA survey by doing a cost/benefit analysis of the potential expense of the inevitable post-delisting litigation. Greater certainty in population count might well result in less litigation expense.

Certainly the data gained by a definitive DNA survey would provide an extremely valuable data set that will be of use post-delisting as a baseline for management and as fodder for advancing scientific knowledge.

Director, the IGBST members are public servants, but they have not served you, or the public, well.

They have thoroughly bamboozled the public, agency personnel, politicians, environmental organizations and special interest groups. Their inability to reliably perform one of their primary functions has exacerbated the delisting debate.

Ironically, it is quite possible that the IGBST has served the GYE grizzly population well, but how can anyone make that judgment when the current methodology produces such ambiguity.

The best way out of this uncomfortable situation is to establish a definitive population count using the best available science: DNA hair analysis.

We believe this would serve the public interest. Litigation, ENGO activism, social, political and media pressure, etc., might all be significantly mitigated if there was a definitive number. It could very possibly put a lot of delisting opponents into the proponent category.

The stakes are immense as this will be the highest profile delisting in the history of the ESA and its success or failure will likely have a profound effect on the future of the ESA.

Respectfully, and with full appreciation of the difficult decision your agency must make.



Kent Nelson
Executive Director
Wyoming Wildlife Advocates

cc: Secretary Sally Jewel
Governor Matt Mead
Governor C. L. Otter
Governor Steve Bullock
Tammy Whittington, IGBC Chair
Mary Erickson, IGBC YES Chair
Chris Servheen, Grizzly Bear Recovery Coordinator

Attachments/Additional information available at:
(these two documents are attached to the hard copy version of this letter as separate documents):

[Southwest Alberta Grizzly Bear Monitoring Project brochure](#)

[Wildlife Habitat Initiative - Grizzly Bear Monitoring](#)