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In accordance with TWS policy, The Wildlife Society Council seeks member review and comment on the following revised position statement prior to renewing it. Comments must be received by **15 July 2009** to be considered in a final position statement. Please send comments to: **Laura Bies, Director of Government Affairs, The Wildlife Society, 5410 Grosvenor Lane, Suite 200, Bethesda, MD 20814-2144, or via email to laura@wildlife.org.**

Revised Position Statement

Management and Conservation of Brown Bears

Conservation of brown bears in North America, including the grizzly bear (*Ursus arctos horribilis*) and Alaska brown bear (*Ursus arctos middendorfi*), has become an increasingly controversial issue as conflicts between this species and humans continue to increase. Heightened concern over the hunting of and depredations by brown bears is evident across their range. Controversy exists over management of bears that prey upon ungulates in Alaska and Canada. Confrontations between brown bears and visitors within national parks and wild areas have not abated. Additionally, the Grizzly Bear Recovery Plan for this species in Idaho, Montana, Washington, and Wyoming has heightened agency involvement in and increased public awareness of brown bear conservation. Mortality of brown bears resulting from conflicts with humans and intensive development and activity within brown bear habitat threaten populations of these species.

Control actions and illegal killing of bears are the major mortality sources in the Yellowstone region, the Cabinet Mountains, the Selkirk Mountains, and southwestern Alberta in the southern portions of occupied brown bear habitat. Mortality of brown bears in national parks usually is related to control of individuals that repeatedly damage property, visit campgrounds, or have been involved in human death or injury. The illegal kill of brown bears is substantial and difficult to estimate or reduce but commonly may be over 25% of the known mortality. Mortality in Alaska, British Columbia, parts of Alberta, and the northern Continental Divide region in Montana is primarily from legal hunting.

Brown bears are jeopardized when human activities intensify in their habitats and people come into close contact with bears. Non-hunting mortality results from conflicts involving perceived or real threats to life and property. People who live, work, and recreate in brown bear habitat often do not keep their living areas clean of garbage or store their food properly.

Depredations by brown bears upon livestock may occur whenever bears and livestock occur together. Depredations may increase during periods of natural food shortages. Policies of relocating domestic sheep bands away from brown bear habitat, grazing areas when bears are not likely to be present, and changes in livestock management to minimize depredation probabilities should reduce conflicts. Introduction of livestock into brown bear range where domestic-animal grazing previously did not occur poses a threat to some brown bear populations in Canada.

Effects of forest management activities on brown bear habitat vary regionally, depending upon differences in plant succession, timber rotation lengths, and forest management plans. Attention to cumulative effects of all management activities on brown bear habitat in time and space should help reduce conflicts.

Effects of forest activities on bear-human interactions are also important. Intensive forest development in brown bear habitat, which is frequently undeveloped land, generally improves human access but increases both disturbance and direct man-caused mortality of bears. Hydrocarbon and mineral exploration and development pose similar problems of increasing human activity within brown bear habitat.

Responsible management of predator-prey systems such as the moose-predator complex (one predator is the brown bear) requires delineation of specific management objectives and the ability to monitor changes in densities of predators and prey. However, such information is extremely difficult to obtain.

The policy of The Wildlife Society in regard to management and conservation of brown bears is to:

1. Recognize that because many human activities are incompatible with this species, retention of self-sustaining populations of brown bears represents a major challenge in wildlife conservation.
2. Encourage coordinated efforts to manage brown bear populations and their habitats, as exemplified in the Grizzly Bear Recovery Plan for Idaho, Montana, Washington, and Wyoming. Efforts must include cooperation between Canada and the United States in border areas where bears occur.
3. Encourage efforts that reduce conflict between humans and brown bears, including (1) public information programs, (2) closures to human use of areas that are important habitats during periods bears use these areas, (3) improved sanitation around human habitations in brown bear habitat, (4) establishment of enclosures and other structures that prevent or restrict bears from entering campsites in national parks and wilderness areas, (5) elimination of domestic sheep grazing on public lands occupied by brown bears in the Greater Yellowstone Ecosystem, and (6) rigorous enforcement of rules and regulations designed to protect the species.
4. Encourage efforts to reduce nonhunting mortality, including bear deaths related to defense of life and property, poaching, livestock depredations, vehicle collisions, and management and research activities. The sale of all bear parts should be strictly forbidden.
5. Encourage efforts to more effectively manage brown bear harvests to ensure that populations are maintained at self-sustaining levels. Such efforts may include hunter education programs and restrictions on black bear (*Ursus americanus*) hunting in habitat occupied by brown bears.
6. Encourage efforts to develop accurate methods to estimate population parameters, including trend, recruitment, and mortality.

7. Encourage incorporation of brown bear needs into comprehensive planning for forestry, mining, agricultural, and other human activities in current or potential habitats needed for recovery. Cumulative effects of human activities must be monitored and evaluated to minimize human encroachment and retain the integrity and quality of brown bear habitats. Acquisition, leases, and easements of important habitats for brown bear management are encouraged.
8. Discourage roads and motorized vehicle access in important brown bear habitat. When construction is necessary, access and use must be controlled.
9. Encourage research into brown bear habitat relationships, requirements, and effects of habitat modification. Research should be well designed, reviewed, executed, analyzed, and published.
10. Encourage efforts to understand the ecology of predation by brown bears upon ungulates and to manage predator-prey interactions involving the brown bear with concern for the bear as well as for prey.
11. Encourage augmentations of existing populations that are at low levels and in need of being increased artificially. Reintroductions of brown bears into previously occupied and currently suitable habitats that are vacant are encouraged, especially within wilderness and national parks, to ensure that this species will exist in as many areas of its former range as possible. Re-establishment efforts must consider the need to manage brown bear populations compatibly with land uses on adjacent habitats.
12. Encourage dissemination of accurate information to the public on brown bear conservation and management, and encourage public involvement in conservation of this species.
13. Encourage management agencies in northern areas, where some brown bear population levels still are high, to take steps now to avoid bear problems that have occurred in southern areas.

Divide Ecosystem (NCDE) in Montana is listed as threatened under the ESA. There is no legal hunting in the United States except Alaska (although there may soon be highly regulated hunting of delisted bears in the Yellowstone area). There is now no hunting in Alberta. Hence the last sentence is wrong. We suggest deleting “commonly” with respect to the estimate that unreported kills may be “more than 25% of reported kills”; this is highly variable. With respect to causes of mortality, in the NCDE during 1999-2008, human food/stock was the ultimate reason for 32 percent of 190 human-caused mortalities followed by illegal (26 percent), hit by trains or auto (24 percent), self defense (10 percent), and other or unknown (8 percent).

Paragraph 4. We see no reason to constrain the final sentence to “...some brown bear populations in Canada” [why just Canada?] or to restrict the issue of restricting livestock grazing to circumstances where it poses a “threat”. We suggest the following revision to this sentence: “It is inadvisable to introduce livestock into brown bear range where domestic-animal grazing previously did not occur.” In support of this change, we observe that the Final Conservation Strategy for grizzly bears in the Greater Yellowstone Ecosystem (March 2007: 43) which required forest plan revisions for 6 National Forests surrounding Yellowstone states their policy in this way: “Inside the PCA [Primary Conservation Area] no new active commercial livestock grazing allotments [term includes cattle and sheep] will be created and there will be no increases in permitted sheep Animal Months (AMs) from the identified 1998 baseline (Appendix F). Existing sheep allotments will be monitored, evaluated, and phased out as the opportunity arises with willing permittees.” In fact, since 2001 there have been more than 500,000 acres of grazing allotments (sheep and cattle) on National Forests surrounding Yellowstone Park that have been purchased from willing sellers by conservation groups (headed by the NWF) to reduce conflicts with wildlife (bears, wolves, and bison). This is a problem better (fiscally and socially) avoided than fixed.

Paragraph 5. We think that either paragraphs 5 and 6 should acknowledge more specifically, the problems motorized access routes in grizzly bear habitat pose to populations through fragmentation as well as increased mortality (the latter is acknowledge to some degree as it stands in paragraph 6). Motorized access routes are the primary factor in creating new access into formerly unroaded areas causing fragmentation of habitat and increasing mortality risk. There is a lot of science behind this. We suggest replacing statement 8 with something like: “At least in areas where there are conservation concerns about grizzly bears, there should be an emphasis on finding ways to reduce the number of existing roads and to avoid increasing the number of existing motorized access routes because of concerns over increased human-caused mortality and fragmentation of habitat. In bear habitat, new roads should be decommissioned after use.”

Paragraph 7 (predation management). Suggest replacement “delineation of specific management objectives” with “clear identification of specific management objectives in terms of predator and prey abundance and timelines”. Note that in some places (notably Alaska) this is a serious issue as the current objectives mandated by state law over much of Alaska is to maximize production of ungulate meat through “intensive management”.

This term has come to mean nothing but reductions of predators (including wolves and both species of bears). The current program is open ended in time and space and the response to failure to achieve more ungulate harvests is to assume that this is because insufficient numbers of predators have been killed.

Paragraph 7. It is very important in our view that this be changed to reflect that the view of TWS is not just that there be "...the ability to monitor changes in densities of predator and prey" (current wording...emphasis added) but also that this monitoring be actually done and reported on in a systematic way. There have been considerable advances in the ability to monitor bears and we disagree with the assertion that "it is extremely difficult to obtain" [information on bear abundance] although we acknowledge that it isn't cheap. We recommend elimination of this last sentence and replacement of this paragraph with the following (which is consistent with the NRC recommendations on predator management in Alaska, 1997):

The intentional reduction of bears and other predators to increase hunter harvest of ungulates is a problematic strategy from many social and biological standpoints. Where such management is attempted, it should be done in accordance with the recommendations of the National Research Council (1997 "Wolves, Bears, and Their Prey in Alaska, biological and social Challenges in Wildlife Management"). Additionally, we recommend that all efforts to reduce grizzly bears motivated by the desire to increase ungulate abundance be done in a controlled and well-monitored way, in an area that is geographically small and temporally limited, and where research exists that demonstrates that predation by bears is likely to contribute to chronically low ungulate densities. These constraints are necessary to avoid repeating management errors of the past which have reduced grizzly bears to a small fraction of their former ranges south of Canada.

This concept also should be reflected in statement #10.

Comments on numbered policy points:

Point 1. Again, could be more positive and less defensive as an opening point (see above comments regarding paragraph 1). Also, "self-sustaining populations" can be comprised of just a few individuals; perhaps would be better to indicate that populations should be sustained at or near natural levels.

Point 2. Suggest ending first sentence at end of ...Recovery Plan and not listing states. This, then, would include Canada as well. If this is done, then, the last sentence isn't needed as coordinated efforts between nations would already be included as well as between states. You could add the specific comment that this is the kind of coordinated effort that the Interagency Grizzly Bear Committee (in existence since 1983) has long been doing.

Point 3. To subpoint (3) add "and around back county use areas such a camp and campgrounds". Suggest eliminating subpoint (4) ("establishment of enclosures...")

because nobody is doing this (fencing people in to protect them from bears) and it is the wrong thing to recommend anyway. Subpoint (3) is the correct emphasis—keeping human food away from bears. Eliminate “in the Greater Yellowstone Ecosystem” from subpoint (5); as discussed above this (eliminating sheep grazing) should be universal and not restricted to the GYE.

Point 4. Change “reduce” to minimize. Need to add that minimization of mortalities from mistaken ID kills by black bear hunters is very important. [In Montana, for example, black bear hunters must take a quiz to be sure they know the differences between black and grizzly bears; this isn’t much of an issue in Alaska or BC]. Should also mention that many kills of grizzly bears occur from hunters after other species (e.g. elk in Montana, deer in Alaska) who kill grizzly bears “in defense of life” situations many of which result from poor hunting practices. We don’t know that reduction of “research mortalities” needs to be mentioned here, such efforts are extremely aggressive now and not a conservation issue.

We agree with the proposed statement about not allowing sale of any bear parts (Point 4). This statement should probably reflect that it applies to BROWN bear parts and to North America (see position title change suggestion). Commercialization of bear parts should ALWAYS be viewed skeptically in our view but we recognize that the sale of BLACK bear parts is legal in some states and provinces. This statement may fit better under point 5.

We suggest adding, as well: “Given the low reproductive rates of brown bears [and ethical concerns?], hunting regulations should not allow the shooting of bears accompanied by offspring.” It is important to say “accompanied by offspring” as female brown bears typically keep their cubs with them for 2.5 years (1.5 years in Europe) and the period of maternal care can vary up to 5 years in some circumstances.

Point 5 indicates that bear harvests should be maintained so that populations are “...maintained at self-sustaining levels.” Given the history of brown bear management “self-sustaining” is an insufficient and imprecise target. Alaska, for example, is trying to dramatically reduce brown bear numbers but has no stated objective to not retain “self-sustaining” populations. We recommend that a more appropriate objective than “self-sustaining” would be one that allowed brown bear populations to exist at levels that are consistent with long-term population stability at densities that are close those that would occur in the absence of hunting and other human-caused sources of mortality. We acknowledge that “close” is also imprecise but it achieves its objective of eliminating massive intensive reductions such as are being attempted in Alaska.

Additionally, we think that care should be taken not to suggest that black bear hunting necessarily needs to be eliminated in areas occupied by brown bears. In Alaska and BC, for example, black bears are common in many areas where brown bears are also common. Further, in the Bitterroots of central Idaho and western Montana, concerns by black bear hunters that their activities may be proscribed is an impediment to getting grizzlies restored to this area. We suggest a statement that indicates that some black bear

hunting techniques may need to be modified and/or that outreach and education to black bear hunters be enhanced in areas where brown bear populations are considered “threatened” or “at risk”. [This may be as simple as requiring black bear hunters to take a bear identification course prior to getting a black bear hunting tag].

Point 6. There are currently accurate methods to estimate population size and trend. What would be nice would be less expensive yet accurate and precise methods to do this on a regular basis (more frequently for very small populations than large ones but probably not necessary to do annually in most cases). Research toward this end is needed but especially for small and isolated populations it is important to recognize that maintaining brown bears will require regular monitoring regardless of cost.

Point 7. It is important to recognize that, in some cases, some developments cannot be made compatible with brown bear conservation due to habitat loss, mortality risk, or both. This statement is correct even in areas outside "current or potential habitats needed for recovery". The long-term goal of the TWS should be to maintain healthy habitats for brown bears across their current and possible ranges.

Point 8. Suggest ending sentence with: “and the motorized access route should be obliterated when the use is completed.”

Point 10. Although this is already said well, this point is very important to emphasize (see above comments with respect to Point 5 and the above comments on paragraph 7). Alaska has the largest and most widely distributed brown bear population in the United States (there are some in Canada too) and Alaska has a special responsibility not to repeat the past errors of the lower 48. There is little indication that this is happening in Alaska now (because of constraints imposed by state statutes). At a minimum, we recommend you say that management and monitoring efforts should be done consistent with the NRC panel’s recommendations (see above comments on paragraph 7). You should consider too saying that the experience in the lower 48 states where many millions of dollars have been spent on recovery indicates that it is better to avoid repeating these mistakes than trying to fix them (you say this in point 13 but perhaps it should be here instead. If it were up to us, we’d say something along the lines that maximizing the human harvest of ungulates is a poor justification, in most instances, for chronic and geographically widespread efforts to reduce grizzly bear numbers (This is exactly what is happening in Alaska despite the denials from some staff within ADF&G—the organization for which 4 of the undersigned conducted research on grizzly bears).

Signed by:

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