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August 28, 2015

Daniel M. Ashe, Director
U.S Fish and Wildlife Service
1849 C Street, NW, Room 3331
Washington, DC 20240

Re: Delisting of Greater Yellowstone Grizzly Bear Population

Dear Director Ashe:

The U.S. Fish and Wildlife Service (Service) listed grizzly bears as a threatened species in 1975. Since that time, Wyoming, Idaho and Montana have worked tirelessly for recovery of the bear and its return to state management. We have focused on the criteria set forth in the Service's Grizzly Bear Recovery Plan to ensure a successful recovery and delisting.

Since the early 2000s, the Greater Yellowstone Grizzly Bear population has exceeded all established recovery criteria detailed in the Recovery Plan. In 2007, the Service designated and delisted the Greater Yellowstone Grizzly Bear Distinct Population Segment (DPS). Ensuing court action reinstated federal protections, not because of the DPS's status, but because of the Service's failure to evaluate the effects of the decline of whitebark pine in its delisting analysis. We worked to address this concern even as bear conflicts across our states increased. In 2013, the Interagency Grizzly Bear Study Team provided analysis and conclusions confirming that a reduction in whitebark pine seeds would not adversely affect grizzly bear populations. The Service, the states, the Interagency Grizzly Bear Committee, and the Yellowstone Ecosystem Subcommittee reviewed and accepted these conclusions.

For over 15 months, we worked with you and your staff to update the post-delisting management framework. This framework includes management guidelines for bear abundance consistent with the 95% confidence interval for the 2007 population estimates. It also maintains a population greater than the established recovery criteria of 500 bears and the Service's minimum viable population of 400 bears. The framework represents a biologically sound, legally defensible approach to a healthy, viable Greater Yellowstone Grizzly Bear population.
We take pride in our part in achieving one of the most successful species recovery stories of our time. With increasing conflicts, however, delisting delay is needlessly straining relationships vital to responsible grizzly bear management. States and communities have little incentive to support species recovery if success does not end ESA constraints and return species to state management.

If the Service is unable to publish a draft rule to designate and delist the Greater Yellowstone Grizzly Bear DPS by November 5, 2015, the States will consider all available options. It is important for the Service to acknowledge the achievement of recovery and fulfill the purpose of the ESA by proceeding with a delisting that is long overdue.

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