

From: [Seryheen, Chris](#)
To: [Gibson Scott, Mary](#); [Brent L Larson](#); [cmark](#); [Cornie Hudson](#); [Dan Tyers](#); [Dan Wenk](#); [david_kampwerth](#); [Deb Frauson](#); [dmeints](#); [dmvers01](#); [fishandgame](#); [ivanmanen](#); [glosinski](#); [Jacque A Buchanan](#); [Jan Laye](#); [Joseph G Alexander](#); [Katharine Wilmot](#); [kerry_gunther](#); [lwatson](#); [m75stewar](#); [mark.bruscino](#); [mark_haroldson](#); [mark_sattelberg](#); [Mary C Erickson](#); [mdavey](#); [pat_hnilicka](#); [pflowers](#); [shurt](#); [sjackson03](#); [sschmidt](#); [Steve Cain](#); [tom ryder](#); [virginia kelly](#)
Cc: [Davis, Ellen -FS](#); [Scott Talbott \(scott.talbott@wyo.gov\)](#) ([scott.talbott@wyo.gov](#)); [jim.unsworth@idfg.idaho.gov](#); [McDonald, Ken](#); ["Michael_Thabault@fws.gov"](#); [Matt Hogan \(matt_hogan@fws.gov\)](#)
Subject: RE: NOA published in the Federal Register on proposed changes to Yellowstone area demographic criteria
Date: Tuesday, September 10, 2013 4:04:40 PM

Here is an update on where we are with this process of revising the Yellowstone demographic criteria:

- The public comment period closed on June 20.
- We have summarized the major comment issues and developed some proposed changes to the draft criteria and detailed responses to all the major comments except one (see below).
- Many of the public and NGO commenters based their opposition to the proposed demographic criteria changes on a paper published in June 2013 by D. Doak and K. Cutler who said in part: *"...we conclude that the GYE population has probably increased far less than generally believed..."; "...past analyses have been too inaccurate to allow any firm conclusions about the dynamics or status of the population..."; "...a reevaluation of the acceptable mortality limits for bears is also needed..."; and "...our results suggest that we actually know very little about the past trends of this population, and hence about their likely future fate, especially with rapid declines in multiple food resources and increases in opportunities for human conflicts."*

A formal rebuttal of this Doak/Cutler paper has been written by the IGBST and other scientists and has been submitted to the same journal (Conservation Letters) that published the original paper in June. This rebuttal finds no scientific basis for any of the Doak/Cutler conclusions due to: 1) their flawed simulations and analyses; 2) their unrealistic assumptions about incorporating effects of survival and reproductive senescence; and 3) their lack of understanding of the

Yellowstone data, the study system, and previous research findings and publications on Yellowstone bears. We are waiting for the standard peer-review process and subsequent decision from this journal to publish this rebuttal paper and will then use the rebuttal paper to respond to the public comments that reference Doak/Cutler.

We expect to discuss the few changes to the draft and the responses to the public comments with the YES team members once the decision is made on publishing the rebuttal paper. This will likely be later this fall or shortly after the first of the year.

Chris

From: Servheen, Chris

Sent: Wednesday, May 08, 2013 11:15 AM

To: 'Gibson Scott, Mary'; 'Brent L Larson'; 'cmark'; 'Cornie Hudson'; 'Dan Tyers'; 'Dan Wenk'; 'david_kampwerth'; 'Deb Frauson'; 'dmeints'; 'dmyers01'; 'fishandgame'; 'fvanmanen'; 'glosinski'; 'Jacque A Buchanan'; 'Jan Laye'; 'Joseph G Alexander'; 'Katharine Wilmot'; 'kerry_gunther'; 'lwatson'; 'm75stewar'; 'mark.bruscino'; 'mark_haroldson'; 'mark_sattelberg'; 'Mary C Erickson'; 'mdavey'; 'pat_hnilicka'; 'pflowers'; 'shurt'; 'sjackson03'; 'sschmidt'; 'Steve Cain'; 'tom ryder'; 'virginia kelly'

Cc: Davis, Ellen -FS; Scott Talbott (scott.talbott@wyo.gov) (scott.talbott@wyo.gov); 'jim.unsworth@idfg.idaho.gov'; McDonald, Ken; 'Michael_Thabault@fws.gov'; Matt Hogan (matt_hogan@fws.gov)

Subject: RE: NOA published in the Federal Register on proposed changes to Yellowstone area demographic criteria

We received a request to extend the public comment period by 60 days from Defenders of Wildlife, GYC, NRDC, and Sierra Club via a letter from Earthjustice. We decided to extend the comment period 30 days to June 20, 2013. Earthjustice was informed of this extension and was appreciative. A Federal Register notice describing this extension will be published the week of May 13.

Chris

From: Servheen, Chris

Sent: Thursday, March 21, 2013 2:10 PM

To: 'Gibson Scott, Mary'; 'Brent L Larson'; 'cmark'; 'Cornie Hudson'; 'Dan Tyers'; 'Dan Wenk'; 'david_kampwerth'; 'Deb Frauson'; 'dmeints'; 'dmyers01'; 'fishandgame'; 'fvanmanen'; 'glosinski'; 'Jacque A Buchanan'; 'Jan Laye'; 'Joseph G Alexander'; 'Katharine Wilmot'; 'kerry_gunther'; 'lwatson'; 'm75stewar'; 'mark.bruscino'; 'mark_haroldson'; 'mark_sattelberg'; 'Mary C Erickson'; 'mdavey'; 'pat_hnilicka'; 'pflowers'; 'shurt'; 'sjackson03'; 'sschmidt'; 'Steve Cain'; 'tom ryder'; 'virginia kelly'

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To give you a concise statement of what this is about, here is a summary:

This is a proposed revision to demographic criteria 1 and 3 in the Recovery Plan to reflect new scientific information and techniques on ways to monitor and manage a healthy grizzly bear population in the Yellowstone ecosystem. These changes are based on the results of a recent demographic review by the Interagency Grizzly Bear Study Team. Their analyses examined population data collected from 2002-2011 to explore any changes that may have occurred since their previous analyses using data from 1983-2002. We propose to add the application of these new scientific results to the grizzly bear monitoring and management systems in the Yellowstone ecosystem.

We are proposing to update portions of Demographic Recovery Criteria 1 and 3 for the Yellowstone grizzly bear population based on new scientific analyses and information. Since these criteria were last updated, new approaches and scientific protocols have been developed. These proposed updates are:

- Update Criterion 1 to reflect the demographic goal of maintaining a minimum population size of 500 animals and at least 48 females with cubs. We also propose to eliminate the criterion's dependence on a specific method (e.g., Chao2) so that we can rapidly implement improved scientific methods as they become available in the peer reviewed literature. This approach will allow us to be more nimble in applying new and improved scientific methodology as they become available. Methods used to estimate population size will be documented and detailed in the Application Protocol posted on the Interagency Grizzly Bear Study Team's website.
- Update Demographic Criterion 3 to require sustainable mortality rates (i.e., rates that will avoid population declines). Instead of specifying what the sustainable mortality rates for independent females (at least 2 years old), independent

males, and dependent young (<2 years old) are, these rates would be calculated by the Study Team and modified as new data indicates warranted. In order to demonstrate how this will be objective and measurable, we note that as of 2012, the sustainable mortality limit for independent females is 7.6% while the limits for independent males and dependent young are 15% and 7.6%, respectively.

- **Designate a Monitoring Area within which all demographic criteria are assessed. This requires us to revise the area within which mortalities are counted against the mortality limits for independent females and males and dependent young so the area where population size is estimated is the same area where mortalities are counted. This means we would no longer count mortalities of bears in areas outside this Monitoring Area against sustainable mortality limits, and, conversely, we would not count bears observed outside this Monitoring Area toward our estimates of population size.**

After receiving and considering public comments and peer review, the final criteria would replace the current Demographic Criteria and would be appended to the Yellowstone chapter of the Grizzly Bear Recovery Plan (U.S. Fish and Wildlife Service 1993) and the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area.

Chris

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"If there are no dogs in heaven, then when I die I want to go where they went." - Will Rogers

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Sent: Thursday, March 21, 2013 11:15 AM

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Subject: NOA published in the Federal Register on proposed changes to Yellowstone area demographic criteria

The Notice of Availability is now posted on this website for the proposed changes to the demographic criteria for the grizzly bear population in the Greater Yellowstone Area:

<http://www.fws.gov/mountain-prairie/species/mammals/grizzly/yellowstoneindex.html>

The public comment period is open until May, 21, 2013.

These proposed changes were developed through a cooperative interagency effort with Yellowstone ecosystem partner agencies.

Chris

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