

From: [Frazer, Gary](#)
To: [David Willms](#)
Subject: Comments
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David -- Here are the primary comments relating to the "and vs or" issue. -- GDF

From Peer Reviewer 4:

The plan to maintain the GYE grizzly population within the approximate current population estimate appears to be based on sound wildlife science using established and repeatedly tested analyses used to generate these population parameters. Specific numerical criteria are established as multi-agency management "failsafe" switches to minimize the likelihood of population decline through active management and accountability of and response to natural mortality. As a final contingency, USFWS has discretionary power to act unilaterally to propose relisting if deemed necessary. **I do have concerns about lags in decision-making in response to population declines that drop numbers below 600.**

Discretionary mortality rules are clearly explained and should be relatively easy to follow within the PCA, but differ on lands outside the PCA where state wildlife agency approaches to this issue somewhat vary depending on the severity of human-bear conflict. The management plans of Idaho, Montana, and Wyoming indicate a desire for the grizzly to be classified as a game species for the purposes of hunting. Montana's plan also indicates a strong commitment to facilitate reconnection of the GYE and NCDE bear populations in the western portion of the state. Other than to comply with maintaining a minimum population size within the DMA, none of the states establish population targets and associated specific harvest criteria within their management plans. It is concerning that overharvest and a potential **subsequent lag in management response** could drive bear numbers below the desired minimum population size.

During potentially high mortality years (e.g. natural food shortages leading to increased human-bear conflicts and bear kills), management responses may be lagging and allow population to dip < 600 before corrective actions are taken, (e.g. "the IGBST will produce a Biology and Monitoring Review to inform the appropriate management response" pp. 40).

From the Greater Yellowstone Coalition:

The Criterion goes on the state, "[if] mortality limits are exceeded for any sex/age class for three consecutive years and any population estimate falls below 612" there will be some management response from the IGBST. Our first concern here is the "and" should be replaced by an "or". Secondly, the management response by the IGBST should not be so discretionary and ambiguous as the "appropriate" management response suggest. Instead, this should trigger a status review consistent with our previous comments.

Center for Biological Diversity:

[T]he mortality limits in this criterion should not be tied to a population minimum but should reflect a criterion on their own. And if mortality limits are exceeded and the population drops below 612 bears, the Service should definitely not wait for three years before determining this criterion is not met and action must be taken. Thus, we would suggest changing this criterion so that if mortality limits are exceeded or the population estimate falls below 612 for two consecutive years, the criterion is not met.

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