

From: [Frazer, Gary](#)
To: [Dan ASHE](#); [Noreen Walsh](#); [Matt Hogan](#); [Teresa Christopher](#); [Michael BEAN](#); [Karen Hyun](#); [Ann Navaro](#); [Sarah Greenberger](#)
Subject: Fwd: GYE grizz
Date: Thursday, September 01, 2016 12:45:22 PM
Attachments: [Appendix C - ALT D 8.31.16.docx](#)
[Criterion 3.revised 8.31.16.docx](#)
[Triggers for Review rule language 8.31.16.docx](#)

fyi. Will keep you posted. -- GDF

Gary Frazer
Assistant Director -- Ecological Services
U.S. Fish and Wildlife Service
(202) 208-4646

----- Forwarded message -----

From: **Frazer, Gary** <gary_frazer@fws.gov>
Date: Thu, Sep 1, 2016 at 12:43 PM
Subject: GYE grizz
To: David Willms <david.willms@wyo.gov>

David -- Attached are edits to the Conservation Strategy, the recovery criteria, and the triggers section of our rule language, all relating to the need for numeric demographic objectives and standards being recalibrated if a population estimator other than Chao2 is adopted down the road.

As you and I discussed this morning, the Service has concluded that, in light of the comments that we received on our delisting proposal, we must have an explicit reference to recalibration in the Conservation Strategy to reflect consistency among the foundational documents that our decision will rely upon. It is, however, limited it to one sentence in Appendix C, at the end of the paragraph at the top of pg 2. You will also see that the Conservation Strategy is undergoing edits from the YES committee on a number of other issues, and some of those are also reflected in the attachment. The version of Appendix C that we have edited uses as its base document the latest edits to Appendix C sent out by Brian Nesvik and Jeff Gould.

The edits to Recovery Criterion 3 serve to clarify that the numeric objectives and standards are tied to model-averaged Chao2 estimates, and that a change in the estimator will require recalibration. But there is one other change ("and" to "or") in the 3rd sentence that is a response to public comments expressing concern about the lag time between excessive mortality rates and documented population response. The result of this change is to simply establish another trigger for an IGBST Biology and Monitoring Review to inform the appropriate response. I'm just flagging it for your understanding. It's separate from the recalibration issue.

Finally, the "trigger" section of the rule language includes both language regarding recalibration in the event of a new estimator being adopted, and a simplification of trigger 3 for a USFWS status review. That simplification just removes the overlap with the circumstances of trigger 1 for an IGBST Biology and Monitoring review. There may be other edits to the specific language of our status review triggers as we go forward, as we also had

confusion about how trigger 4 works.

I'll follow up with you tomorrow after you've had a chance to review. -- GDF

Gary Frazer
Assistant Director -- Ecological Services
U.S. Fish and Wildlife Service
(202) 208-4646