

**From:** Dan Ashe  
**To:** [Dan Wenk](#); [Matt Hogan](#)  
**Cc:** [Sue Masica](#); [Kerry Gunther](#); [P White](#); [Noreen Walsh](#); [Gary Frazer](#); [Bob Dreher](#)  
**Subject:** Re: Tribal Letters.pdf  
**Date:** Friday, May 22, 2015 7:26:04 AM

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Thanks Dan. I appreciate the note. We are in contact with the tribes and are discussing g2g consultations. Our discussions with the states are ongoing, and at this point, we have not reached even a framework agreement for moving forward on delisting.

I have discussed your concerns with Matt Hogan, (deputy RD, Denver) who is our lead. As I committed during our call, we will raise these concerns as the discussions move (hopefully) forward, and we will construct a process to bring you and your team into that discussion.

On Chao2, as we discussed, we are not using the estimator to try to determine a precise population estimate. We know it is biased conservatively. But we believe it is well-suited to use as an index to benchmark management of the Bears against a long-term goal of stability from a 2007 population baseline.

I've copied Matt. We will be in touch before the end of June.

Thanks.

Dan.

Dan Ashe  
Director, U.S. Fish and Wildlife Service

On May 20, 2015, at 1:03 PM, Dan Wenk <[dan\\_wenk@nps.gov](mailto:dan_wenk@nps.gov)> wrote:

Dan,

I appreciated the conversation earlier this month. Thanks for engaging with us in this important discussion.

Based on a separate inquiry, I discovered that I did not send this after our discussion. I asked for the attached letters from the tribes and they were provided promptly by staff. But I failed to put them into one email and send to you. I am sorry for the delay.

The letters from the tribes are included to support our comments on the phone call of the positions they are representing with us. I assume that you, and/or your staff, have seen some if not all of this correspondence as well. We have provided a draft response to the Director to the letter from GOAL for his consideration on their requests for name changes within the park. In that draft response we clarified that the responsibilities for the delisting of the Grizzly Bear is with the U.S. Fish and Wildlife Service.

To recap our conversation.

Yellowstone National Park fully supports the delisting of grizzly bears from Threatened Species status and want delisting to be a success. We discussed our suggestions that we believe will help ensure that delisting is successful for the U.S Fish and Wildlife Service, the National Park Service, and the states of Wyoming, Idaho, and Montana.

1. The chao2 population estimator is known to be biased, especially at the high population densities currently exhibited by the Yellowstone grizzly population. In addition, in the GYE we have always used the most current, best available, peer reviewed, population estimator available. Currently, the best available science for estimating grizzly bear populations in the GYE is the mark-resight population estimator. We believe that using the Chao2 estimator, which is no longer considered the best available science, will leave the delisting process very vulnerable to lawsuits by those opposed to delisting. As we all know, court challenges could significantly delay or stop the delisting process.

2. While we fully support the notion of hunting grizzly bears outside of the National Park, we also recognize that hunting could alienate our constituents. We believe that the hunting zones should be designed to minimize the controversy and potential negative aspects of hunting. Bear viewing is extremely popular in Yellowstone National Park and generates millions of dollars for wildlife tour guides, local businesses, and gateway communities. In addition, there is a high probability that grizzly bears wounded during the hunt may run back into the park, jeopardizing the safety of park visitors hiking and camping nearby.

Grizzly bears are a very adaptable species. In National Parks, where millions of visitors are encouraged to visit each summer, grizzly bears readily habituate to the presence of people. For obvious reasons, habituated grizzly bears will be very susceptible to hunting. The majority of Americans do not hunt or trap, therefore hunting can be a very controversial management tool. The ethical issues surrounding the hunting of habituated park bears just outside of the park boundary will likely be highly contentious. We believe that it is in the states' best interest, as stewards of America's hunting heritage, to carefully consider the ethical issues of hunting habituated bears.

Therefore, to promote the economic benefits of bear viewing and the experience of visitors to Yellowstone National Park, and to reduce the risks associated with wounded bears entering the park, as well as the ethical issues of hunting habituated bears, we recommend that hunting zone boundaries should be away from the Yellowstone National Park boundary.

3. Several Native American tribes affiliated within the Greater

Yellowstone Ecosystem consider the grizzly bear to be culturally significant and have reversed their stance on grizzly bear delisting, primarily due to concerns over the potential trophy hunting of grizzly bears. These tribes have expressed their concerns to Yellowstone National Park managers, even though we do not have plans to hunt bears within the park. We believe it is important for the U.S. Fish and Wildlife Service to engage the affiliated tribes in consultations about delisting and how potential grizzly bear hunting would be managed by the states on public lands. Renewed communication could go a long way toward addressing the tribes concerns. I have attached recent correspondence.

For clarification of our suggestions, please contact:

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<Tribal Letters.pdf>