

May 8, 2015

TO: Matt Hogan, USFWS Region 6
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From: Idaho Fish and Game
Montana Fish, Wildlife and Parks
Wyoming Game and Fish Department

Subject: State response to USFWS's Updated Approach to the Greater Yellowstone Grizzly Bear Recovery and Delisting

In response to the USFWS's Updated Approach to Yellowstone Recovery and Delisting, dated April 23, 2015, the states of Idaho, Wyoming, and Montana offer the following:

Much of the USFWS's Updated Approach document simply clarified or interpreted the States' proposal, dated March 19, 2015. Where appropriate, and where the states were in agreement, relevant points from the USFWS's Updated Approach were incorporated into a revision of the State's proposal (attached, dated May 8, 2015). Additions to that proposal are highlighted in yellow. Responses or clarifications to other items in the USFWS's Updated Approach are addressed below.

- Population Goal - the population goal agreed to by the states is a range equal to the 95% confidence interval around the 2007 Chao2 estimate, which is 609-757. The point estimate within that range is 683. This is the minimum population goal regardless of the method used to estimate the population, unless best available science indicates it is insufficient to maintain recovery (e.g., new genetic studies support revision of the Miller and Waits (2003) recommendation of a total population size of at least 400 bears for genetic health of the relatively isolated GYA population).
- Adaptive Management – the states remain committed to using the best science and adaptive management approach to collectively manage grizzly bears within the GYA. This includes using the best population estimators as they become available, usable and properly approved.
- Mortality limits – if the population is <683, the independent female mortality limit will be less than or equal to 7.6%.
- Mortality Allocation – grizzly bears in the GYA will be managed by the states at an ecosystem scale, with a commitment by the states collectively to not exceed agreed upon mortality limits. Allocation of available mortality among the three states will occur on an annual basis following a process that will be outlined in an MOU that will be signed by the three states upon delisting. Discretionary mortality will be managed such that mortality thresholds for the ecosystem are not exceeded and will be based on management objectives of the three states. The default allocation will be based on the proportion of the geographical area of the DMA within each state.
- Wind River Reservation – any desired hunting mortality on the Wind River Reservation will be counted as part of the total available discretionary mortality for the ecosystem, and would likely come from the portion of discretionary mortality allocated to Wyoming. Actual allocation will be negotiated between the Wind River Reservation and State of Wyoming.
- Demographic Regulatory Mechanisms – see final bullet in State proposal. The states agree to incorporate post-delisting management points into an MOU signed by the three agency directors that will include an annual mortality review and allocation process. The States will also

work with USFWS and other members of the Conservation Strategy Team to incorporate these points as appropriate into a revision of the Conservation Strategy for the grizzly bears in the GYA. The agency directors will act as needed to incorporate these points into their respective state management plans and policies.

- Connectivity – Connectivity was not a requirement of the 2007 delisting rule, and the States have been assured by Director Ashe that connectivity will not be a requirement of a new delisting rule. Therefore this item is not included in the State's proposal. As we move into management of recovered grizzly bears in the GYA and NCDE, Montana may address this issue through ongoing management planning. However, any declaration of "no hunting zones" as part of the federal delisting rule is unacceptable.
- Triggers – contrary to item #8 in the USFWS's Updated Approach document, the state proposal did include "triggers". To make this more clear, the states incorporated agreeable portions of Table 2 from the USFWS's Updated Approach into the revised state proposal. Rather than call them triggers, the states suggest they be referred to as scenarios. As can be seen in the revised state proposal (Table 2), the states feel strongly that the different scenarios be based on the status of the population, rather than a more broad approach. The states did delete trigger #7 from Table 2 (failure to receive adequate funding) since inadequate funding may or may not have any impact on the ability to demonstrate ongoing commitments to post delisting management of grizzly bears in the GYA.

We feel the attached proposal represents a solid commitment on behalf of the states of ID, MT, and WY to ensure grizzly bears in the GYA will be managed to ensure a robust and recovered population of grizzly bears in the Greater Yellowstone Area.