

From: [Servheen, Chris](#)
To: [Chris Smith](#)
Cc: [Matt Hogan](#); Michael_Thabault@fws.gov
Subject: Re: Most recent draft of Yellowstone CS
Date: Wednesday, February 04, 2015 8:23:27 AM
Attachments: [RP supplement_Yellowstone Grizzly bear Demographic Criteria_v7_draft.docx](#)

Chris,

This is the basis for the changes/update in the demographic criteria from the 2007 rule to the present rule. The attached is the final draft incorporating the public comments and the input from the state/federal team of biologists that developed this. This is what would go into the updated CS and the proposed rule. This was developed by a team based on the best available science including the state and federal members of the study team. All agencies were represented. This went out for public and agency comments in 2013 and what is attached incorporates these comments. I left the comments in this version so you can see them. Wyoming wrote a comment letter in support of these changes. Montana and Idaho did not comment during the public comment period but their staff participated in the development of these changes.

Chris

From: Chris Smith <csmithwmi@msn.com<<mailto:csmithwmi@msn.com>>>
Date: Monday, February 2, 2015 4:11 PM
To: Chris Servheen <grizz@umontana.edu<<mailto:grizz@umontana.edu>>>
Subject: Most recent draft of Yellowstone CS

Chris,

Would you please send me the most recent draft of the Yellowstone CS so I can review that prior to the state-FWS meeting? I probably don't need the entire document if the habitat elements are not at issue, but at a minimum I need to get all the demographic elements or other points of contention that are likely to come up.

Also, Mike Thabault mentioned this a.m. that you were working on a comparison of the key elements of the '07 rule and CS and what the FWS has proposed for the Yellowstone now. How's that coming? It could be helpful with the discussion on the 18th.

Thanks,

Chris

Grizzly Bear Recovery Plan

Supplement: Revised Demographic Recovery Criteria for the Yellowstone Ecosystem

Original Approved: January 29, 1982

Revised Plan Approved: September 10, 1993

Previous Supplement on Demographic Recovery Criteria Approved: March 6, 2007

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Approved:

Regional Director, U.S. Fish and Wildlife Service

Date

Demographic Recovery Criteria for the Grizzly Bear Population in the Greater Yellowstone Ecosystem

In 2007, we supplemented the 1993 Grizzly Bear Recovery Plan with revised demographic criteria for the Greater Yellowstone Ecosystem (GYE) population (72 FR 11376, March 13, 2007). Since that time, new information relevant to these demographic criteria has become available. Consistent with Task Y11 of the Grizzly Bear Recovery Plan (U.S. Fish and Wildlife Service 1993, p. 44) that directs the Service to “Reevaluate and refine population criteria as new information becomes available,” we are revising the demographic criteria based on updated demographic analyses and the best available science.

The revised demographic recovery criteria in the GYE are:

- Demographic Recovery Criterion 1 — Within the Demographic Monitoring Area (DMA), maintain a minimum population size of at least 500 animals¹~~and at least 48 females with cubs~~, as indicated by methods established in published, peer-reviewed scientific literature and calculated by the Interagency Grizzly Bear Study Team (the Study Team) using the most updated Protocol, as posted on their website. The estimate of total population size cannot drop below 500 ~~or 48 females with cubs~~ in any single year. This estimate will be calculated using data obtained within the DMA shown in Figure 1. If less than ~~48 females with cubs per year~~500 bears are documented~~are reported~~, this criterion will not be met and the Study Team will produce a Biology and Monitoring Review to inform the appropriate management response.
- Demographic Recovery Criterion 2 — Sixteen of 18 bear management units within the Recovery Zone (Figure 2) must be occupied by females with young, with no 2 adjacent bear management units unoccupied, during a 6-year sum of observations. This criterion is important as it ensures that reproductive females occupy the majority of the Recovery Zone and are not concentrated in one portion of the ecosystem.
- Demographic Recovery Criterion 3 — Within the DMA, calculate sustainable mortality limits annually for independent females (at least 2 years old), independent males (at least 2 years old), and dependent young (less than 2 years old) that

¹ This number is required to maintain short-term genetic fitness in the next few decades. It is not a target, but a floor.

correspond to a lambda value (i.e., population growth rate) of at least 1.0. This ensures the population does not [experience a long-term](#) decline. Annual mortality limits will be calculated using sustainable mortality rates and the estimated population size for that year, as reported by the Study Team using peer reviewed scientific methods [such as known fate analyses \(see Harris et al. 2006\)](#). Instead of permanently setting these rates in the criterion as was done in the 2007 Supplement, the Study Team may now adjust these rates in response to changes they detect in population vital rates. For example, the sustainable mortality rate using data from 2002-2011 is 7.6% for independent females while the rates for independent males and dependent young are 15% and 7.6%, respectively. ~~These rates for independent females and dependent young are lower than what was calculated using data from 1983-2002, highlighting the importance of allowing the Study Team to adjust these rates in response to changes they detect in population vital rates.~~ If mortality limits for independent females are exceeded in any 2 consecutive years, this criterion will not be met and the Study Team will produce a Biology and Monitoring Review to inform the appropriate management response. Similarly, if mortality limits for independent males or dependent young are exceeded in any 3 consecutive years, this criterion will not be met and a Biology and Monitoring Review will be completed. Mortalities will be counted and reported annually using data obtained within the DMA shown in Figure 1.

Background

In 2000, we began a process to reevaluate and update methods to determine the status of the GYE grizzly bear population, estimate population size, and determine the sustainable level of mortality in the GYE. The Wildlife Monograph: “Temporal, Spatial, and Environmental Influences on The Demographics of Grizzly Bears in The Greater Yellowstone Ecosystem” (Schwartz et al. 2006); the report: “Reassessing Methods to Estimate Population Size and Sustainable Mortality Limits for the Yellowstone Grizzly Bear” (Interagency Grizzly Bear Study Team 2005); and the report: “Reassessing Methods to Estimate Population Size and Sustainable Mortality Limits for the Yellowstone Grizzly Bear Workshop Document Supplement 19-21 June, 2006” (Interagency Grizzly Bear Study Team 2006) provided the scientific basis for revising the demographic recovery criteria in the GYE in 2007. Similarly, the revisions we are implementing through this Supplement to the Recovery Plan are based on updated demographic analyses using the same methods as before (Schwartz et al. 2006), as reported in the Interagency Grizzly Bear Study Team’s 2012 report: “Updating and Evaluating Approaches to Estimate Population Size and Sustainable Mortality Limits for Grizzly Bears in the Greater Yellowstone

Ecosystem.” This 2012 Study Team report provides the scientific basis for the changes proposed below.

We changed the first and third criteria because they no longer represent the best scientific data or the best technique to assess recovery of the Yellowstone grizzly bear population. Specifically, these criteria warrant revision because – (1) There are updated demographic analyses for 2002-2011 indicating that the rate of growth seen during the 1983–2001 period has slowed and sex ratios have changed; (2) there is consensus among scientists and statisticians that the area within which we apply mortality limits should be the same area we use to estimate population size; and (3) the need exists to make the demographic criteria dynamic so the Study Team can incorporate results from updated demographic analyses and implement new scientific methods based on peer-reviewed, scientific literature as they become available.

These criteria replace the 2007 Demographic Criteria and are hereby appended to the Yellowstone chapter of the Grizzly Bear Recovery Plan (U.S. Fish and Wildlife Service 1993, p. 44) and the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area.

More information about Revisions to Demographic Criterion 1:

~~Because the GYE grizzly bear population is currently isolated from other grizzly bear populations, to adequately mitigate the potential effects of genetic drift and inbreeding depression, Miller and Waits (2003) recommended that the total population size for the GYE grizzly bear population be at least 400 bears. To assure that this goal is met and in order to adopt a conservative approach, the total population will be maintained above 500 grizzly bears in the GYE.~~ The biological intent of this revision is identical to the 2007 criterion: to maintain a minimum population size of at least 500 animals which exceeds the genetic recommendations of Miller and Waits (2003). The only change is that this criterion no longer specifies which scientific method must be used to assess the criterion. We eliminated the criterion’s dependence on a specific method (e.g., Chao2) so the Study Team can rapidly implement improved scientific methods as they become available in the peer reviewed literature. Methods used to estimate population size will be available online for review in the Application Protocol posted on the Interagency Grizzly Bear Study Team’s website (<http://nrm-sc.usgs.gov/research/igbst/research>). –The number 500 is not a population goal nor is there any intention to manage down to 500 bears. The number 500 is a floor that the population cannot go below to assure population health.

~~While continuing to reflect the demographic goal of maintaining a minimum population size of 500 animals and at least 48 females with cubs, this criterion no longer specifies which scientific method must be used to assess the criterion. We eliminated the criterion's dependence on a specific method (e.g., Chao2) so the Study Team can rapidly implement improved scientific methods as they become available in the peer reviewed literature. Methods used to estimate population size will be available online for review in the Application Protocol posted on the Interagency Grizzly Bear Study Team's website (<http://nrmssc.usgs.gov/research/igbst/research>).~~

More information about Revisions to Demographic Criterion 3:

Demographic Criterion 3 requires sustainable mortality limits to be calculated each year. As in the past, these mortality limits are based on scientific analyses that calculate the level of mortality the grizzly bear population can tolerate without declining (i.e., the sustainable mortality rate). The sustainable mortality rates established in the 2007 Demographic Criteria were based on data obtained between 1983 and 2002 from radio-collared bears and the modeling results of Harris et al. (2006). When these Demographic Criteria triggered a demographic review by the Study Team in 2011, they examined more recent data from 2002-2011 and compared the results of these new analyses with those from the previous time period. Between 2002 and 2011, population growth slowed and sex ratios changed, with more independent males in the population than previously documented (Interagency Grizzly Bear Study Team 2012). When sustainable mortality rates were re-calculated with these recent data, the Study Team found rates had changed for some age and sex classes. Specifically, the sustainable mortality rate for independent females from all sources changed from 9.0% to 7.6% and the sustainable mortality rate for dependent young from human causes only also changed from 9.0% to 7.6% (Study Team 2012). Because these rates represent the best available science, we revised Demographic Criterion 3 to reflect these new demographic analyses. The language in Demographic Criterion 3 allows results from demographic analyses to be implemented as they become available and sustainable mortality rates adjusted accordingly ~~to prevent population decline within the DMA.~~

While the general biological intent of this proposed revision is identical to the 2007 criterion (i.e., to establish mortality limits that prevent population decline), there is one important difference. The new rates are based on knowing what level of mortality will result in population stability instead of population growth, and managing mortalities below that level rather than setting the mortality limit using the lower bound of the 95%

~~confidence interval that results in population stability so that 95% of the time the population would increase. . Managing at the lower bound of the 95% confidence interval (as was done in the 2007 demographic criteria) is no longer appropriate because of the new demographic analyses. Because the point estimate of lambda for the entire GYE is 1.022 (IGBST 2012), there is no lower 95% CI that results in a stable population.~~

~~Human-caused mortality will always be the limiting factor for this grizzly bear population. Because there are several indications the population is at or near approaching carrying capacity and population growth has slowed (see Schwartz et al. 2006; Interagency Grizzly Bear Study Team 2012; Bjornlie et al. 2014), managing human-caused mortality at levels to prevent long-term population decline is reasonable. No population can grow forever since the resources it requires are finite. When a population grows too large for its environment to support continued growth, it is said to be above “carrying capacity.” Carrying capacity in wild species that are habitat generalists like grizzly bears varies from year to year and seasonally. Although carrying capacity varies widely in natural environments, there are several indications that the GYE grizzly bear population is at or near carrying capacity inside suitable habitat (see Schwartz et al. 2006; Interagency Grizzly Bear Study Team 2012). The agencies recognize that this population will soon need to be managed for stability instead of ever increasing growth (Interagency Grizzly Bear Study Team 2012) because the resources to maintain any wildlife population are finite.~~

Like the methods adopted in 2007, Demographic Criterion 3 continues to count deaths of independent (at least 2 years old) male and female grizzly bears from all sources against annual mortality limits while counting only known and probable human-caused mortalities against annual mortality limits for dependent young (less than 2 years old). For independent females and males, counted mortalities include: (1) known and probable human-caused mortalities; (2) reported deaths due to natural and undetermined causes; and (3) calculated unreported human-caused mortalities. The Study Team will continue to use the methods of Cherry et al. (2002) to estimate unknown/unreported mortalities each year based on the number of known, reported deaths (Cherry et al. 2002, p. 179; Interagency Grizzly Bear Study Team 2005, pp. 39-41).

Annual mortality limits will be measured and applied ~~assessed~~ within the DMA shown in Figure 1. The Study Team developed this DMA using USFWS suitable habitat (see 72 FR 14866, March 29, 2007) as a base layer then adding areas which could serve as mortality sinks (e.g., cities) because these areas could have disproportionate effects on the population generally contained within the suitable habitat zone (Interagency Grizzly Bear Study Team 2012). Mortalities outside of the DMA will be recorded and reported

but do not count against the sustainable mortality limits for that year. Grizzly bear occupancy will not be actively discouraged outside the DMA and grizzly bears will not be ~~persecuted captured~~ just because they are there. ~~However, as is the case within the DMA boundary, individual bears may be removed from the population or relocated if there are conflicts. On occasion, grizzly bears may also be preemptively relocated to avoid conflicts if there is a demonstrated threat to human safety. However, bears will not be moved just because they are seen. There has to be a clear reason to preemptively move bears. Preemptive moves would not be classified as a conflict for the bear being moved.~~

We ~~would~~ expect bears to occasionally move through and gradually reoccupy habitat between the GYE and the Northern Continental Divide Ecosystem (NCDE) in the Highland and Tobacco Root mountain ranges ~~at low population densities~~. To allow the opportunity for non-nuisance grizzly bears to reoccupy these mountain ranges at low densities, grizzly bears will not be captured and removed unless there are documented conflicts or ~~demonstrated~~ threats to human safety, as determined by wildlife agency personnel. As is the case inside the DMA, management emphasis will be on conflict prevention and response. Attractant storage rules are in place on National Forest lands. Additional habitat protections are not necessary for recovery.

Application of the proposed revisions to Demographic Criteria 1 and 3.

The Application Protocol describing the current methods to evaluate and measure these Demographic Recovery Criteria are available at the Study Team's website and will be updated as necessary to assure the use of the best available science. See: <http://nrmsc.usgs.gov/research/igbst-home.htm>



Figure 1. The Demographic Monitoring Area within which all demographic criteria would be assessed.

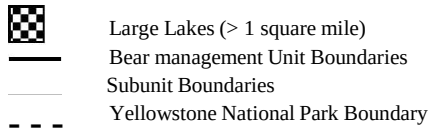


Figure 2. Yellowstone grizzly bear recovery zone boundary showing bear management unit (BMU) and subunit boundaries for application of Demographic Criterion 2.

Responses to public comments: Greater Yellowstone Ecosystem grizzly bear demographic criteria changes

We released draft revisions to the demographic recovery criteria for the Greater Yellowstone Ecosystem grizzly bear population for public comment and peer review on March 22, 2013 (78 FR 17708). The 90-day comment period ended June 20, 2013 (see 78 FR 29774, May 21, 2013). During this time, we received approximately 40,000 comments and one solicited peer review. We have made appropriate changes in the Final Supplement to the demographic criteria in response to these comments or, for comments not directly addressed through the final Supplement, comments are summarized below followed by our response to each.

1. Comment: The apparent increase in the number of females with cubs of the year (FCOY) can be explained by factors other than an actual increase in population size. Specifically, Doak and Cutler (2013) said this apparent increase could be explained by increased observer effort, changes in sightability due to changes in food sources, and not including reproductive or survival senescence.

Response: We disagree with Doak and Cutler's (2013, doi: 10.1111/conl.12048) conclusions. They do not raise any new or unaddressed issues. In fact, similar concerns or analyses that question the validity of the Study Team's population demographics analyses due to these very same reasons have been thoroughly disclosed, analyzed, and rebutted in the scientific literature previously (see Eberhardt and Cherry 2000; Cherry et al. 2002; Keating et al. 2002; Interagency Grizzly Bear Study Team 2005, 2006; Haroldson et al. 2006; Harris et al. 2006; Schwartz et al. 2006; Harris et al. 2007; Cherry et al. 2007; Schwartz et al. 2008; Interagency Grizzly Bear Study Team 2012). Doak and Cutler (2013) is the latest attempt to undermine the scientific credibility of an interagency cooperative research effort that has made the GYE grizzly bear population the most studied grizzly bear population in the world. The Study Team systematically rebutted the critique of Doak and Cutler (2013) in a follow-up paper submitted to the same journal (~~Conservation Letters~~) in August 2013 ((van Manen et al. ~~2014, in review~~). In that paper, van Manen et al. (~~in review~~2014) demonstrate in detail that Doak and Cutler's conclusion that increases in the number of females with cubs are actually due to increased observer effort and/or increases in sightability due to changes in food resources have no basis in fact or science. The primary conclusions from the rebuttal paper (van Manen et al. ~~in review~~2014) are below:

We found major flaws with the premise, implementation, and interpretation of simulations they used to support their arguments. They argued population

increases documented by IGBST based on females with cubs-of-the-year were a function of increased search effort. However, their simulations were not reflective of the true observation process nor did results provide statistical support for their conclusion. Doak & Cutler further argued survival and reproductive senescence should be incorporated into population projections but their choice of extreme mortality risk beyond age 20 and incompatible baseline fecundity substantially influenced their simulations, leading to erroneous conclusions. We conclude their critique was unfounded when placed within the context of a thorough understanding of the data, the study system, and previous research findings and publications.

2. Comment: There should be a criterion about connectivity. There should be identified protected connectivity areas like the draft Northern Continental Divide Ecosystem Grizzly Bear Conservation Strategy proposes.

Response: As stated in the Final Rule (72 FR 14866) and upheld by the Courts, connectivity is not mandatory to ensure genetic isolation will not threaten the GYE grizzly bear population. Therefore, a recovery criterion requiring connectivity is not necessary. That being said, allowing the opportunity for animals to move into or out of the GYE is desirable because it increases the overall probability of persistence for the GYE grizzly bear population (Boyce et al. 2001) by increasing its resiliency, redundancy, and representation. It will allow the GYE population to respond to changes in environmental conditions and/or other factors we have no authority or control over such as private land development, scientific uncertainty, or catastrophic events.

Grizzly bears have already been documented near the Deer Lodge and Butte areas over the past 10 years through occasional bear captures, mortalities, and sightings. We would expect this trend to continue into the foreseeable future, with grizzly bears gradually reoccupying habitat between the GYE and the NCDE in the Highland and Tobacco Root mountain ranges. To allow the opportunity for non-nuisance grizzly bears to reoccupy these mountain ranges at low densities, grizzly bears will not be captured and removed unless there are documented conflicts or ~~demonstrated~~ threats to human safety, as determined by wildlife agency personnel. Human safety will always be prioritized over facilitation of grizzly occupancy between the ecosystems. As is the case inside the DMA, management emphasis will be on conflict prevention and response. Attractant storage rules are in place on National Forest lands. Additional habitat protections are not necessary for recovery in these areas between the GYE and NCDE.

3. Comment: The Centennials, Gravelly's, Snowcrest, Wyoming, and Wind River Mountain ranges should be included in the DMA.
Response: The Centennial, Gravelly, and Wind River Ranges are already included in the DMA. The Wyoming and Snowcrest ranges are not included in the revised DMA because of the quantitative method the Study Team used to define its boundary. They determined the average annual activity radius of female grizzly bears was 6 km, then buffered the Service's suitable habitat boundary by this amount. The Snowcrest range is not part of the DMA but discretionary mortalities will be minimized here. Grizzly bears will not be captured and removed from this area unless there are conflicts or demonstrated threats to human safety. The DMA is finite because of the areas the Study Team surveys for bears. Bears beyond the DMA are not required for recovery in the GYE.
4. Comment: Implementing the plan will only further preclude connectivity with other grizzly bear populations.
Response: We disagree because grizzly bears will not be captured and removed from areas between the GYE and NCDE unless there are conflicts or demonstrated threats to human safety.
5. Comment: Some commenters were concerned that the sustainable mortality rate is set at a value that corresponds with a stable population growth rate instead of an increasing one. They say it is unclear if managing for stability is consistent with the ESA. At face value, this means you're managing a threatened species to remain a threatened species.
Response: Wording has been modified so management will assure that the population does not decline and mortalities will be managed below the sustainable mortality rate. Within the DMA, we are managing GYE grizzly bears to ensure no decline and to improve their status from threatened.
6. Comment: The new methodology is intended to increase, not decrease, the number of bear mortalities, in contravention of the ESA.
Response: The new methodology is not designed to increase the number of mortalities. Instead it is designed to assure that mortalities do not exceed sustainable mortality levels. Within the DMA, mortalities will be managed in a dynamic way so that if the population continues to increase, the sustainable mortality rate will increase. If the population stabilizes the sustainable mortality rate will stabilize and if the population should decrease the sustainable mortality

rate will decrease. The new methodology is designed to assure that the mortality limits are known so that management can assure that this mortality does not exceed sustainable mortality.

7. Comment: The ESA requires that public notice and opportunity for public review and comment be provided during recovery plan development and revision.
Response: We agree. As always, changes to criteria contained in a recovery plan will include an opportunity for public review and comment. However, future changes to the methods we use to assess and evaluate recovery plan criteria will not necessarily be subject to public review because ~~although~~ they ~~always~~ go through both a scientific peer review process and an agency peer review process. _
8. Comment: The revised criteria will allow more bears to die even though their numbers have stabilized. Won't this lead to a decline in numbers if current mortality levels result in a stable population?
Response: The new criteria will assure that the mortality levels do not exceed sustainable mortality levels so the population within the DMA will not decline. Eventually the population must stabilize as it reaches the carrying capacity of the ecosystem and the proposed management system will assure that mortalities are adjusted so that the population does not decline due to excessive mortality.
9. Comment: The plan to relocate bears from other ecosystems to the GYE to address genetic isolation violates the spirit of the Endangered Species Act and the Service's stated "primary goal" of "restoring a threatened animal to the point where it is again a secure, self-sustaining member of its ecosystem." (as quoted from 78 FR 17708).
Response: Relocation of bears to the GYA as a method of recovering the species has been upheld by a reviewing court (Greater Yellowstone Coalition v. Servheen et al.). While natural connectivity and dispersal between ecosystems on occasion is desirable, manually moving bears between ecosystems is scientifically defensible to mitigate any future genetic threats.
10. Comment: It appears this proposed rapid-response approach would effectively exclude the scientific community from participating in the process of reviewing status and trend methodology outside of the formal peer review process.
Response: This Supplement allows the Study Team to implement new scientific methods to assess demographic recovery criteria as they become available, instead of viewing assessment methods as a revision to the actual criteria. All demographic assessment methods are subject to extensive peer review processes by members of

the scientific community. Subjecting methods to scientific peer review and publication processes therefore ensures the scientific community will continue to be the driving force behind grizzly bear management in the GYE. We do not believe it is necessary or appropriate to have the general public vet scientific methods used to assess demographic criteria. That being said, we welcome comments from anyone at any time that provide scientific information, alternative methods, literature or research we may not be aware of, or scientific critiques for our consideration.

11. Comment: Item # 26 in Appendix C of the Yellowstone Conservation Strategy says: "No changes in the population management systems will be made unless these changes are based on the best available science and the changes have been subject to peer review and an open public process."

Response: No changes are being proposed or made to the process described in the Conservation Strategy.

12. Comment: It is not clear as to when or how often new mortality limits would be calculated.

Response: Mortality limits will be calculated every year using the estimate of population size for that year. Mortality rates that these annual limits are based on would be reassessed if demographic monitoring indicates that the sustainable mortality levels have changed.

13. Comment: FWS must explain the Capture-Mark-Recapture (CMR) method better, how to handle moth sites if it were adopted, and how the "very large Confidence Intervals" fit into conservative decision-making.

Response: We agree these 3 issues warrant further evaluation, as stated by the Study Team (2012, p. 30). ~~Further, w~~The Study Team e-will not implement any method until it has been vetted and published in a peer-reviewed ~~professional-scientific~~ journal. ~~reference Higgs paper.~~ -

14. Comment: There were multiple comments regarding the level of uncertainty surrounding estimates of population growth, population size, and mortality limits. Some requested that we identify and address the uncertainty associated with population and allowable mortality estimates, provide clear criteria for how those estimates and their associated uncertainty are analyzed and addressed, and consider using the standard 95% confidence interval to ensure conservative management. While the Service knows the Knight rule set is biased low, in many steps of the

process of calculating population size and mortality rates, the levels of uncertainty are unknown. The peer reviewer thought “Accurate demographic analysis of the GYA grizzly population is precluded by low sample size and wide variance. ...there is substantial uncertainty around estimates of population performance. Thus the demographic criteria will support grizzly bear conservation only as long as embedded system errors are conservative.”

Response: Uncertainty is a fact in all wildlife management decisions. It is unavoidable because it is a by-product of monitoring a population using a sample of individuals instead of every single member. The scientific community generally quantifies uncertainty as a “confidence interval” around a “point estimate.” As the names imply, a confidence interval describes a range of values within which we can be reasonably sure that the true value for the entire population actually lies while the point estimate is the closest approximation of reality based on *that sample*. A 95% confidence interval is often interpreted as indicating a range within which we can be 95% certain that the true value lies. While it is obviously desirable to reduce levels of uncertainty to gain a more accurate picture of reality, uncertainty (as described with confidence intervals) is a scientific fact and scientists are morally obligated to disclose levels of uncertainty surrounding their estimates, if they are known. In other words, uncertainty is part of the scientific method. Science ~~cannot~~does not provide unequivocal answers to decision makers ~~and it never will~~.

Due to the biological traits of grizzly bears (e.g., elusive, intelligent, slow reproducers so they have to be followed several consecutive years, wide-roaming, tendencies to use habitat in rugged mountain terrain far from any access option that would accommodate trapping), estimates of population size and population trend invariably include values that do not allow managers to entirely reject the possibility of population decline. Clearly, this decreases confidence in our decisions. But as the peer reviewer acknowledged, “most wildlife is managed with much less information and most maintain stable to increasing populations.” To improve our confidence, we monitor multiple indices of population health (e.g., litter size, reproductive interval, age specific survival, sex ratios, etc.) in addition to trend and size to be sure all data are pointing in the same direction. This increases confidence in our decisions and also in the point estimates of population trend and size. Another way we increase confidence in our decisions is by using different methods to estimate the same parameters and making sure they corroborate. For example, our estimate of trend using radio-collared bears and known fate analyses is approximately the same as our estimate of trend using the Chao2 estimator. The point estimates are the closest approximation of reality and it is therefore reasonable

to use them to inform our decisions. As Schwartz et al. (2006, p. 62) noted, “To claim that no decision about what has occurred should be adopted until uncertainty is removed, or to claim that the only acceptable decision adopts some lower confidence limit as truth, is to reject the role of science.”

Managing by the lower 95% confidence interval that results in a stable population (as was done in the 2007 demographic criteria) is no longer ~~appropriate-an option~~ because of the new demographic analyses. Because the point estimate of lambda for the entire GYE is 1.0~~22~~, there is no lower 95% confidence interval that results in a stable population (Study Team 2012).

15. Comment: The Service fails to sufficiently explain why it is ~~managing a threatened species establishing a population goal of 500 and adjusting mortality limits to manage~~ for stability.

Response: As reflected in this Supplement to the Grizzly Bear Recovery Plan, the Service has clarified that 500 is not a “goal” but a lower limit. Stability is no longer the management direction and the wording in Criterion 3 has been changed to emphasize that the goal is to manage mortality below sustainable limits so the population does not decline within the DMA. It is not the desire or in the interests of any agency in the GYE to attempt to manage at maximum allowable mortality limits every year because this would result in additional work for those agencies when the Study Team (which they are members of) is required to conduct a Biology and Monitoring Review in response to excessive human-caused mortality.

16. Comment: One peer reviewer was concerned about the complexity behind the math for estimating the proportion of FCOY in the population (0.289) and questioned if the assumption of a stable age distribution is met for this population of grizzly bears.

Response: As Schwartz and White (2008) indicated, the assumption of a stable age distribution is reasonable for most bear populations, and especially for Yellowstone, where mean female survival rates have been relatively constant since the mid 1980s. The Study Team estimates the proportion of FCOY in the population based on the stable state transition probability for females with COY in the population because the technique is unaffected by differences in capture probabilities among reproductive states and is unbiased if the number of 3-year-old females in the sample is representative of the number in the population. Point estimates for the proportion of females in the “with COY” state are simple to calculate (e.g., can

easily be calculated in a spreadsheet) and are derived from the monitoring data. Calculating confidence intervals or investigating the influence of covariates is more complicated but this does not justify choosing a simpler but biased technique. This technique is indeed based on the assumption that the population has a relatively stable age distribution and that transition probabilities are constant across time, but so are any of the alternative (but biased) techniques when data are pooled.

17. Comment: Supplement the female with cubs population estimate with a DNA-based population estimate. However, this DNA-based estimate “would not have to be as rigorous as the DNA-based population estimate for the NCDE”.

Response: We agree that a DNA-based estimate is of value but the actual cost of applying such an estimate to the 50,000 square kilometers of occupied grizzly habitat in the Yellowstone ecosystem, even if it was a less rigorous sampling than the NCDE estimate, would be millions of additional dollars beyond currently available funding and would be a one-time estimate. If a less rigorous system was implemented, it would undermine the accuracy of the results because sample size would be reduced and variance would increase.

18. Comment: “...evidence suggests that density dependence and whitebark pine declines are causing growth to slow, but that these results are completely confounded.”

Response: We agree that the results are complex. The foods synthesis document (IGBST 2013) includes several analyses that attempt to clarify and tease apart these two similar effects. Regardless of whether these changes are being driven by declines in whitebark pine or are simply an indication of a population reaching carrying capacity, our management response would be the same: to carefully manage human-caused mortality. Managing mortality to assure that the population does not decline will address population management while other, ongoing studies examine the potential causes of any changes observed.

19. Comment: The DMA is substantially smaller than that proposed in 2007 and “excludes substantial areas of suitable habitat in Wyoming and Montana.”

Response: The suitable habitat area is described and defined in the explanation sheet on suitable habitat provided as part of the proposed changes (available at http://www.fws.gov/mountain-prairie/species/mammals/grizzly/BackgroundOnUSFWS_SuitableHabitatMarch2013.pdf). The previous area within which mortality limits were assessed was substantially larger than the area within which data were collected to estimate

population size. The Study Team was not monitoring the entire area for population growth, only mortality. This means we were counting mortalities in areas where we weren't monitoring for population size or trend. This inevitably leads to underestimating the size of the population which is then used to estimate sustainable mortality limits. The revised DMA addresses this known bias so that mortalities and population health and size will be monitored in the same area.

20. Comment: The Service should clearly state the differences in size and counts with the new versus the old DMAs.

Response: While the DMA described in this Supplement is nearly half the size of the previous area within which we counted mortalities (49,931 sq km instead of 95,225 sq km), only a very small proportion of mortalities (~ 10 percent) occur outside this area. For example, between 2007 and 2012 there were 258 grizzly bear mortalities in the GYE. Of these, 28 mortalities (11 independent females and 17 independent males) would not have been counted toward mortality limits using the DMA. It is important to note that five of these 258 mortalities were not counted toward mortality limits under the 2007 demographic criteria because they occurred outside of the previous monitoring area. In other words, we have always had to define an area within which mortality limits will apply. Before the 2007 Supplement, we only counted mortalities that occurred inside the Recovery Zone and a 10 mile buffer against mortality limits. This area was substantially smaller than the size of the DMA identified in this Supplement. The bottom line is that if mortalities are within sustainable limits within a defined area, the population will not decline in that defined area. Below, we provide an example of the 2012 mortality limits for various age classes in the previous monitoring area and the DMA identified in this Supplement. Figure 3 shows the spatial pattern of known and probable mortalities from 2007-2012.

	Previous monitoring area	DMA
Independent female mortalities observed in 2012 (mortality limit)	15 (23)	12 (19)
Independent male mortalities observed in 2012 (mortality limit)	34 (24)	31 (37)
Dependent young mortalities observed in 2012 (mortality limit)	6 (17)	6 (17)

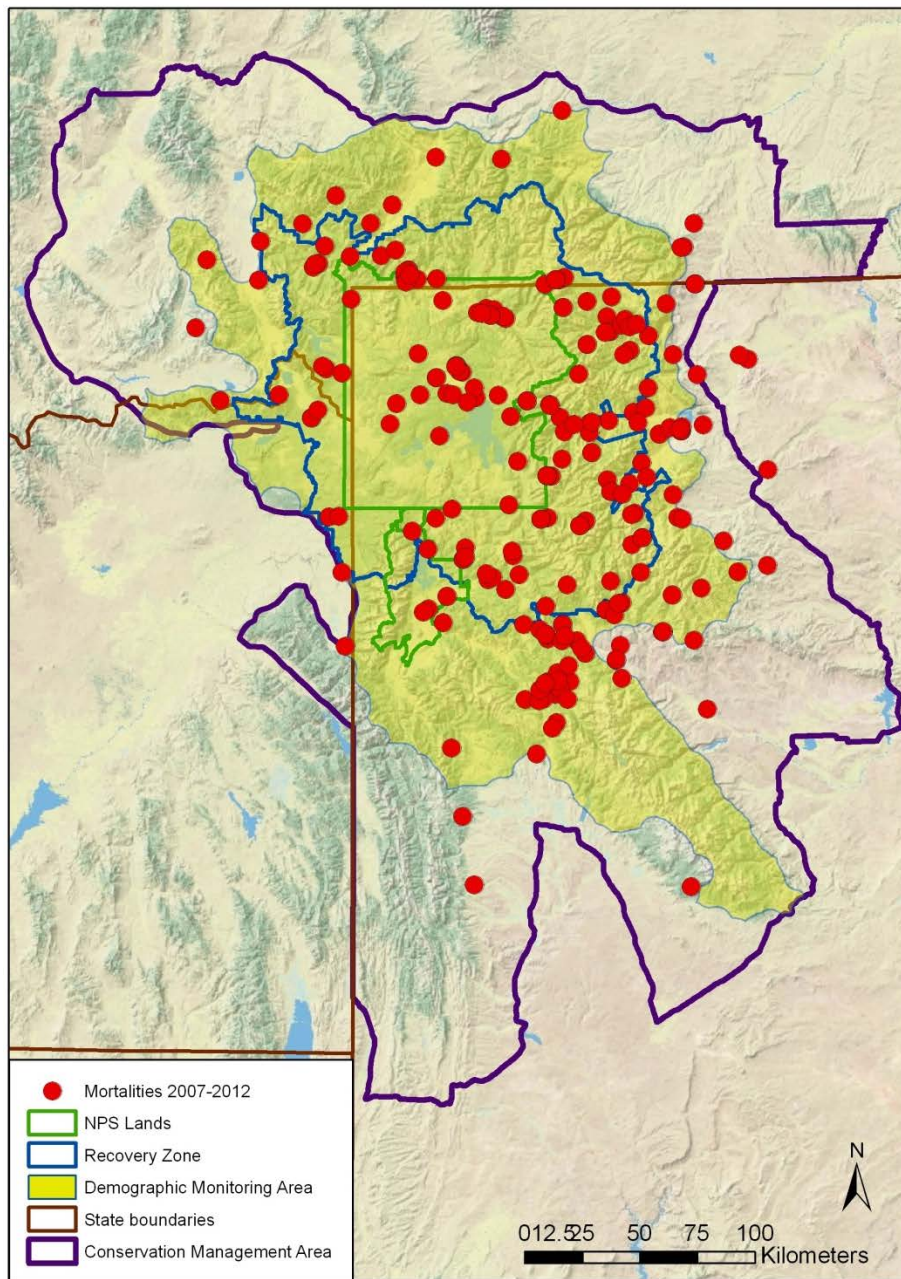


Figure 3. Known and probable grizzly mortalities 2007-2012 inside and outside the DMA identified in this Supplement.

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Appendix A.

Implementation Schedule

The following Implementation Schedule outlines actions and estimated costs for the grizzly bear (*Ursus arctos horribilis*) recovery program over the next 5 years in the GYE. Functioning as a practical guide for meeting the species' recovery goals, this schedule indicates action priorities, action numbers, action descriptions, duration of actions, and estimated costs. In addition, parties with authority, responsibility, or expressed interest in implementing a specific recovery action are identified; however, this neither obligates nor implies a requirement for the identified party to implement the action(s) or secure funding for implementing the action(s). However, parties willing to participate may benefit by being able to show in their own budgets that their funding request is for a recovery action identified in an approved recovery plan and, therefore, is considered a necessary action for the overall coordinated effort to recover the grizzly bear. Also, section 7(a)(1) of the ESA, as amended, directs all Federal agencies to utilize their authorities in furtherance of the purposes of the ESA by carrying out programs for the conservation threatened and endangered species. The following implementation schedule only covers time and cost estimates related to the demographic recovery criteria discussed in this Supplement. However, the total cost for annual implementation of all recovery actions is approximately \$3,773,685. It is not practicable to estimate the total time to recovery as we do not know how long the population will remain listed.

Key to Implementation Schedule Priorities (column 1)

PRIORITY 1 ACTION: An action that must be taken to prevent extinction or to prevent the species from declining irreversibly in the foreseeable future.

PRIORITY 2 ACTION: An action that must be taken to prevent a significant decline in species population/habitat quality or some other significant negative impact short of extinction.

PRIORITY 3 ACTION: All other actions necessary to provide for full recovery of the species.

Key to responsible parties in column 4:

USFS =	U.S. Forest Service
YNP =	Yellowstone National Park
USGS =	U.S. Geological Survey
MT =	Montana Fish Wildlife and Parks Department
ID =	Idaho Fish and Game Department
WY =	Wyoming Game and Fish Department
GTNP =	Grand Teton National Park

Action Priority	Action Description	Action Duration	Responsible Parties	USFWS Lead	Total (annual) Costs	Comments
3	Monitor the number of females with cubs.	Annual	USGS, MT, WY, ID, YNP, GTNP, USFS	N	\$203,920	Estimate derived from Appendix H of the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area and adjusted for inflation.
3	Monitor and investigate grizzly bear mortalities	Annual	USGS, MT, WY, ID, YNP, GTNP, USFS, USFWS	N	\$108,235	Estimate derived from Appendix H of the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area and adjusted for inflation.
3	Monitor distribution of family groups	Annual	USGS, MT, WY, ID, YNP, GTNP, USFS	N	\$78,165	Estimate derived from Appendix H of the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area and adjusted for inflation.
3	Maintain sample of at least 25 radio-collared females	Annual	USGS, MT, WY, ID, YNP, GTNP, USFS	N	\$462,735	Estimate derived from Appendix H of the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area and adjusted for inflation.
3	Management of grizzly bear/human conflicts	Annual	USGS, MT, WY, ID, YNP, GTNP, USFS	N	\$2,230,435	Estimate derived from Appendix H of the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area and adjusted for inflation.
3	Conflict prevention via outreach and education	Annual	USGS, MT, WY, ID, YNP, GTNP, USFS	N	\$210,630	Estimate derived from Appendix H of the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area and adjusted for inflation.
3	Report writing, data analyses, literature publication	Annual	USGS, MT, WY, ID, YNP, GTNP, USFS	N	\$25,000	Estimate derived from Appendix H of the Final Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Area and adjusted for inflation.

Note: It is anticipated that these annual costs will continue in perpetuity, regardless of listed status, or until cheaper methods to obtain the same quality of information are developed