

From: [Matt Hogan](#)
To: [Richard Hannan](#)
Subject: FW: Yellowstone delisting
Date: Thursday, July 10, 2014 1:40:52 PM
Attachments: [wyoming comment on demographic criteria.pdf](#)

From: Servheen, Chris [mailto:grizz@umontana.edu]
Sent: Thursday, July 10, 2014 11:41 AM
To: Unsworth,James; Scott Talbott (scott.talbott@wyo.gov) (scott.talbott@wyo.gov)
Cc: Matt Hogan (matt_hogan@fws.gov); Richard_hannan@fws.gov
Subject: Yellowstone delisting

Jim and Scott,

We are on the verge of proposing delisting for the Yellowstone population. I am writing you this note because in a meeting with Ken McDonald yesterday about the NCDE he made it clear that he is meeting with you at WAFWA to outline his (Montana's) objections to the Yellowstone mortality management process that was developed with all the state and federal biologists in Yellowstone. I understand that your staff briefed you about this process recently. If these jointly developed mortality management systems are compromised, it is unlikely the Service will be able to legally defend the adequacy of regulatory mechanisms related to mortality management in the Yellowstone ecosystem and thus delisting may not be successful.

These mortality management systems are composed of the following two parts:

The revision of the Yellowstone demographic criteria developed jointly with the states was released for public comment in 2013. Wyoming offered supportive and constructive comments on these revisions (copy attached). Idaho and Montana did not submit comments. Key changes in this revision included:

- Revision of the area (called the Demographic Monitoring Area - DMA) where mortalities will be counted to the same area where the population is monitored and estimated. The old mortality monitoring area was 95,225 sq. km. while the new Demographic Monitoring Area where mortalities will count against the mortality limits is 49,931 sq. km. – a reduction of 45,294 sq. km. or 17,488 sq. miles.
- Revision of the mortality limits based on the new IGBST data for 2001-2012.
- Revision of the mortality rate to one that results in population stability rather than population increase, as was in the 2007 Conservation Strategy and delisting rule.

The establishment (in concert with all the state and IGBST

representatives) of a system to set mortality limits to maintain population stability across the ecosystem that included these key points:

- The IGBST annually estimates total population size and sets the mortality limits from all causes for adult females, adult males and dependent young based on this annual population estimate.
- The discretionary mortality limits outside the National Parks for each cohort are allocated between the management agencies based on the geographic area of each within the demographic monitoring area (DMA) established in the process noted above.
- The states and the Wind River Reservation Tribes agreed to coordinate with each other and manage all sources of mortality inside the DMA within these mortality limits for population stability, as allocated in this process.
- There are response triggers involving management review by the Yellowstone agencies, and eventually by the Service if these mortality limits are exceeded on a regular basis. These response triggers demonstrate the regulatory mechanisms that will be in place and show how agencies will carefully manage within the mortality limits to maintain stability of the population.

It is important to note that the Service has no interest in: 1) the details of how the states implement hunting seasons within the mortality limits; 2) a perpetually increasing population; or 3) micromanaging the states post-delisting. Our interest is a legally and biologically defensible delisting proposal that we can successfully get through the court system.

Please let me know if you would like to discuss these approaches or if I can answer any questions. As we get close to a proposed rule, let's keep in close contact to be sure we are all on the same page.

Thanks,

Chris

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"Try to learn something about everything and everything about something" – Thomas Huxley

