

From: Servheen, Chris
To: [Daniel Thompson](#)
Cc: [Dan Bjornlie](#)
Subject: Re: WY plan
Date: Tuesday, May 10, 2016 9:47:26 AM
Attachments: [81FR13174 GYE proposed rule 11March2016.pdf](#)

Dan,

I agree it is a mess. Note that in Table 1 in the proposed rule on p. 16 in the attached PDF that this mistake appears in this table also. But, it is contradicted by the footnote below the table noting that if the population is less than 674, the total mortality for independent females and dependent young will be less than 7.6%.

The way this happened is:

1. The agreement among all parties out of the Idaho Falls meeting was if the population is less than 674, the total mortality for independent females and dependent young will be less than 7.6%.
2. This agreement was so stated in Dan Ashe's letter to the state directors dated 9/25/15.
3. In closed meetings at a later date, state administrators changed this to less than or equal to 7.6% and the FWS Regional Director and Deputy Regional Director acquiesced to this change.
4. When it was pointed out to these FWS administrators that they had agreed to something that was in violation of what had been agreed to in Idaho Falls and what was stated in the Director's letter, their response was that they "did not want to go back to the states and point out this problem". Instead, their solution was to insert a footnote below the table in the proposed rule that directly contradicted what was in the table. This created

the confusion we have today.

That is "the rest of the story".

The bottom line is that all tables stating mortality percentages at different population sizes should say that mortality for independent females and dependent young will be less than 7.6% if the population is less than or equal to 674. That is what is best for grizzly bears and was agreed to in Idaho Falls by all parties.

Chris

From: Daniel Thompson <daniel.thompson@wyo.gov>

Date: Tuesday, May 10, 2016 at 9:20 AM

To: Chris Servheen <grizz@umontana.edu>

Cc: Dan Bjornlie <dan.bjornlie@wyo.gov>

Subject: Re: WY plan

Thanks Chris, this is a conundrum with that table in proposed rule and multiple different tables as we've discussed. We can address this with commission tomorrow.

DT

On Tuesday, May 10, 2016, Servheen, Chris <grizz@umontana.edu> wrote:

Hey Dan,

I read the WY plan dated May 5 available at

TinyURL.com/WYdraftGrizplan<<http://tinyurl.com/WYdraftGrizplan>> and there is a significant mistake/mistatement you should be

aware of:

Table 1 on p. 5 of the WY plan, the Table captions says "(from USFWS proposed 2016 Demographic Recovery Criteria)".

However, that is NOT the same table as on p. 4 of the USFWS proposed 2016 Demographic Recovery Criteria (attached). The table in the USFWS proposed criteria states that mortality for independent females and dependent young will be less than 7.6% if the population is less than or equal to 674. Table 1 in the WY plan says that mortality for independent females and dependent young will be less or equal to than 7.6% if the population is less than or equal to 674. That is significant functional difference because applying 7.6% mortality to independent females and dependent young in a population below 674 will not allow the population to increase back to the population goal of 674.

Chris

--

Dan J. Thompson, PhD
Large Carnivore Section Supervisor
Wyoming Game and Fish Dept
260 Buena Vista Dr
Lander, WY 82520
(307) 332-2688
Daniel.Thompson@wyo.gov

--

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.