

From: Kasdin, Alexandra
To: [Fortin-Noreus, Jennifer](#)
Subject: Fwd: Comments on Criterion 3
Date: Friday, September 16, 2016 2:58:35 PM

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From: **Kasdin, Alexandra** <alexandra_kasdin@fws.gov>
Date: Fri, Sep 16, 2016 at 2:07 PM
Subject: Comments on Criterion 3
To: Jennifer Fortin-Noreus <jennifer_fortin-noreus@fws.gov>
Cc: Seth Willey <seth_willey@fws.gov>

Hi Jennifer,

I've pasted below excerpts from the Issue Summary on Criterion 3 and the IGBST monitoring review and highlighted the section that we'd love to have sourced.

Let me know if you have questions!

CRITERION 3:

Issues in the comments:

- Confusion about the recovery criteria/suggestions for changing the recovery criteria (from Issue 7):

Some commenters expressed concern with the measurement of demographic recovery **criterion #3** and the adequacy of the triggers associated with this criterion. Many felt that stopping discretionary mortality at a population of 600 bears is too lenient; commenters suggested that the threshold for halting discretionary mortality should be higher than the 95% confidence interval and/or should be the population objective itself (i.e. 674). Commenters expressed that, to be more precautionary, the average around which the population will be maintained should be increased.

Suggestions for modification of this criterion included: making exceedance of mortality limits independent of a population minimum; and eliminating the three year wait between the the population dropping below 612 and determining that the criterion is not met. Some suggested that this criterion should be made easier to interpret, such as using an annual index of observed females with cubs to total observed mortality. Lastly, one commenter suggested that the mortality limit for dependent young is unnecessary because it is not currently being measured.

- Confusion about Service status review triggers (from Issue 69): A few comments from

peer reviewers and the public suggested that our status review triggers are too low or unclear; these commenters also proposed additional triggers. Commenters pointed out that it is unclear what “significantly” means in our trigger “if...[t]here are any changes in Federal, State, or Tribal laws, rules, regulations, or management plans that depart significantly from the specifics of population or habitat management detailed in this proposed rule and significantly increase the threat to the population.” Commenters provided two suggestions for revising the current status review triggers....Second, in the proposed rule, we state that we would initiate a status review “if independent female mortality limits as per tables 1, 2, and 3...are exceeded for three consecutive years and the population is fewer than 600;” commenters expressed concern that this trigger could allow states to exceed mortality limits in 7 out of every 10 years (as long as the years in which mortality limits are exceeded never occur three times in a row), which would allow the population to decline until it drops below 600 bears. As such, these commenters suggested changing this trigger so that the Service would initiate a status review if the mortality limits for independent females are exceeded for two consecutive years and the population is below 600 bears. Commenters and peer reviewers also expressed concern that there will be a lag in a decision-making response to population declines that drop below 600, which may be especially true in high mortality years.

Some expressed concern about the meaningfulness of our triggers and whether the Service would be willing to relist the grizzly bear, should it become necessary. Commenters also noted that the Service triggers need to be standardized in the rule, the Conservation Strategy, and other management plans.

- Confusion about Biology and Monitoring Review triggers (from Issue 70): A few comments from peer reviewers and the public suggested that the triggers for an IGBST Biology and Monitoring Review are too low or are unclear; these commenters and peer reviewers proposed additional triggers. It was suggested that lack of funding should be a trigger for a Biology and Monitoring review. The Biology and Monitoring Review triggers need to be standardized in the rule, the Conservation Strategy, and other management plans.

Thanks so much,

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