



United States Department of the Interior

FISH AND WILDLIFE SERVICE Mountain-Prairie Region



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The Honorable Raúl M. Grijalva
Committee on Natural Resources
House of Representatives
218 Cannon House Office Building
Washington, D.C. 20515

Dear Representative Grijalva:

Thank you for your letter of September 27, 2016, concerning the proposed rule to delist grizzly bears in the Greater Yellowstone Ecosystem (GYE). Specifically, your letter expressed concern about the Conservation Strategy, population targets, connectivity, and hunting. We share your concern for the conservation of the Yellowstone grizzly bear population and delisting will only occur if I am completely satisfied that we have robust commitments that this success can be maintained in the long-term.

Recovery of the Yellowstone grizzly bear population is a remarkable conservation success story and further validation of the success of the Endangered Species Act. The Yellowstone grizzly bear population has rebounded from as few as 136 bears in 1975 to more than 700 today and more than doubled their range since listing. This population now occupies more than 22,500 square miles of the ecosystem. This success would not have been possible without the tireless efforts countless partners including Federal, State, and Tribal agencies, conservation groups, and private citizens, including ranchers, sportsmen, and outfitters.

Recognizing that the population has basically stabilized at or near long-term carrying capacity (with modest growth in recent years), our management partners have agreed to maintain the total population size near the average population estimate for the period of stability achieved during 2002-2014 (i.e., 674 bears as measured by the model-averaged Chao2 with a 95% confidence interval of 600 to 757 bears). This will be accomplished by reducing discretionary mortality to modest, sustainable levels (<7.6%) should the model-averaged Chao2 fall below 674 bears and prohibiting discretionary mortality (except as necessary for human safety) in the unlikely event that the population ever falls below 600 bears. Montana, Idaho, and Wyoming have now all formally adopted these regulatory commitments.

As a result, last month we reopened the comment period on our proposed delisting. In total, we have offered two public comment periods totaling 90-days over the last seven months including March 11, 2016 to May 10, 2016, and September 7, 2016 to October 7, 2016. The most pertinent documents guiding management after delisting have now all been provided to the public for comment including the draft

Conservation Strategy, Federal land management regulatory documents and State discretionary mortality regulatory documents. Additional changes to the Conservation Strategy being considered are either minor or responsive to the public comments. Therefore, we do not believe an additional public comment period on the final draft Conservation Strategy is necessary.

Your letter also raised concerns related to the geography of harvest. Specifically, you asked that the John D. Rockefeller, Jr. Memorial Parkway retain its authority to prohibit hunting as a National Park Service Unit. You also indicated hunting should be prohibited on lands adjacent to the National Parks and within the Primary Conservation Area. Nothing in this rule would alter, or in any way affect, the jurisdiction or authority of the State of Wyoming, Tribal governments, the National Park Service, the U.S. Fish and Wildlife Service, or any other entity with respect to the regulation of hunting. Whatever jurisdiction or authority to authorize, prohibit, or regulate hunting existed in such areas prior to this final rule is unchanged by the promulgation of this rule (except, of course, that this rule removes the protections of the Act).

In short, it is beyond our authority to negotiate further on this point unless it rises to the level of being a threat to viability of the population. In our view, the current suite of discretionary mortality regulations will maintain the Yellowstone grizzly bear's recovered status. That said, the National Park Service and the States have a long history of cooperatively managing harvest for other species in a way that provides for the needs of all parties. We expect this partnership and successful management of harvest will continue.

Finally, your letter expressed concern about connectivity to other grizzly bear populations. We agree that connectivity to other grizzly bear populations to the north is desirable. Such connectivity has been and remains a focus of the Service and our partners. Our proposed delisting would have limited impact on connectivity as nearly all of the intervening habitat where dispersal would occur would remain fully protected by the ESA.

Thank you for your interest in this iconic species and the conservation success story it represents. I hope this letter addresses your concerns. If you need further information, please do not hesitate to contact me at the above letterhead.

Sincerely,

Director