

DRAFT
August 9, 2000
C. Servheen

Governors Dirk Kempthorne, Marc Racicot, and Jim Geringer,

Dear Dirk, Marc, and Jim,

Thank you for your letter of May 31 to Jamie Clark concerning the results of the roundtable established to review the draft Conservation Strategy for the Grizzly Bear in the Yellowstone Ecosystem. I congratulate the members of the roundtable for their efforts and thank them and you for your comments and ideas on the draft Conservation Strategy. We will give careful and through consideration to the recommendations of the roundtable as we review the public comments received on the Strategy.

You summarize your understanding of the necessary administrative steps that must be completed prior to formal consideration of the status of this population for formal delisting. Your list of steps includes:

1. Revision and completion of the conservation strategy incorporating the comments received during the public comment period. (The consideration of comments received during the comment period may require further analysis to adequately address some of these comments. We will work to complete this task in 2001 but our ability to complete all that may be necessary may be limited by funding availability as it was in FY2000).
2. Completion of the state management plans for areas outside the Primary Conservation Area (PCA) to assure that management and mortality of bears outside the PCA do not adversely affect bears within the PCA. (While the Fish and Wildlife Service (Service) has never made the completion of state management plans a necessity prior to delisting, we believe such a proactive effort by the states is an excellent way to further guarantee the existence of adequate regulatory mechanisms and the future of Yellowstone grizzly bears, and demonstrates the commitment of the states to the future of the species.)
3. Amendment of the Montana statutes by the Montana legislature to assure that adequate regulatory mechanisms will be available to the state management agencies regarding grizzly mortality control.

You ask if the above steps are all that is necessary from an administrative perspective to consider the status of this population for formal delisting. Several other actions must be completed for consideration of delisting to begin. These are:

1. Completion of the habitat criteria for recovery in the Yellowstone ecosystem and appending these criteria to the Grizzly Bear Recovery Plan. These criteria were published for public comment in late 1999 and we will be considering the public comments on these draft habitat criteria simultaneous with review and consideration of the comments on the Conservation Strategy. We expect this to be completed in 2001 in concert with the completion of the Conservation Strategy, given adequate funding.
2. Amending the Forest Management Plans for each of the forests in the Yellowstone ecosystem

to incorporate the habitat criteria for grizzly bears that will be appended to the Recovery Plan as mentioned above. This process will assure that habitat management within the PCA specified in the habitat criteria and duplicated in the Conservation Strategy will continue to be the management standards in the national forests after delisting. The Forest Service estimates it will take them approximately 18 months to complete this process once it is started and it cannot begin until the habitat criteria are appended to the Recovery Plan. Completion of these forest plan amendments is dependent upon adequate funding and staffing to complete this effort.

3. Signature by all agencies on the final Conservation Strategy demonstrating that the agencies will implement the details of the Strategy once it comes into force after delisting. Signatures on the Strategy will also demonstrate the adequacy of the regulatory mechanisms provided by the Strategy.

4. Achievement of the population criteria in the Recovery Plan and achievement of the habitat criteria that will be appended to the Recovery Plan.

5. Completion of several ongoing efforts involving technical issues such as development of an unknown/unreported human-caused mortality calculation, and a review of the human-caused mortality limit calculation using the most up to date information. These reports are in draft now and will be refined and completed by 2001. The results of these reports will be incorporated into the population and mortality monitoring methods in the Recovery Plan and the Conservation Strategy.

Thank you for your letter and for the efforts of the roundtable in participating to help improve and refine the Conservation Strategy. We look forward to working with you to complete this process and to assure a strong future for the grizzly in the Yellowstone ecosystem.

Sincerely,

Ralph