

WESTERN ASSOCIATION OF FISH AND WILDLIFE AGENCIES

TERRY STEINWAND

President

c/o North Dakota Game and Fish Department
100 N. Bismarck Expressway
Bismarck, North Dakota 58501-5095
(701) 328-6305

DUANE SHROUFE

First Vice President

Phoenix, AZ

JOHN COOPER

Second Vice President

Pierre, SD

LARRY L. KRUCKENBERG

Secretary

c/o Wyoming Game and Fish Dept.
5400 Bishop Blvd.
Cheyenne, WY 82006
(307) 777-4569

LORIS "RYAN" BRODDRICK

Third Vice President

Sacramento, CA

STEVE BARTON

Treasurer

Boise, Idaho 83707

January 26, 2006

Dr. Chris Servheen
Grizzly Bear Coordinator
U.S. Fish and Wildlife Service
University Hall 309
University of Montana
Missoula, Montana 59812

Dear Dr. Servheen:

The Western Association of Fish and Wildlife Agencies (Association) appreciates this opportunity to present comments on the November 17, 2005, notice in the *Federal Register* designating the Greater Yellowstone Ecosystem population of grizzly bears as a distinct population segment (DPS) and removing said population from the federal list of endangered and threatened wildlife.

The Association, founded in 1922, is a quasi-governmental organization of 23 public agencies charged with the protection and management of fish and wildlife resources in the western part of the United States and Canada. The Association has been a key organization in the promotion of the principles of sound resource management and the strengthening of federal, state and private cooperation in protecting and managing fish and wildlife and their habitats in the public interest. Our mission is, "*Delivering conservation through information exchange and working partnerships*". It is in that spirit that we want to express the unanimous support of our member agencies for the proposed delisting of the Yellowstone DPS of grizzly bears.

As a matter of biological fact, as per the definition in the Endangered Species Act (ESA), the Yellowstone population of grizzly bears is no longer in danger of extinction, nor is it likely to become so in the foreseeable future. Therefore, it is no longer a threatened species. Through the collective efforts of the U. S. Fish and Wildlife Service (USFWS), U. S. Forest Service (USFS), Bureau of Land Management, U. S. Geological Survey, National Park Service (NPS), and the states of Idaho, Montana, and Wyoming, the key measures for Yellowstone grizzly bears have been met. The occupancy goal of adult females with cubs is present in 16 of the 18 management units. The goal has been met or exceeded since 1998. Additionally, the limit on total mortalities has been met every year since 1996. The bear population has been growing at

ALASKA • ALBERTA • ARIZONA • BRITISH COLUMBIA • CALIFORNIA • COLORADO • HAWAII • IDAHO • KANSAS • MONTANA • NEBRASKA • NEVADA
NEW MEXICO • NORTH DAKOTA • OKLAHOMA • OREGON • SASKATCHEWAN • SOUTH DAKOTA • TEXAS • UTAH • WASHINGTON • WYOMING • YUKON

Representing member Fish and Wildlife Agencies since 1922

4% to 7% per year since the early-1990s. All of the criteria in the five-factor analysis required in Section 4(a)(1) of the ESA have been addressed and resolved. Recovery of the Yellowstone DPS of grizzly bears is completed and verified.

The states that comprise and surround the recovery area have developed, and stand ready to implement, an integrated *Conservation Strategy* to assure appropriate management of the delisted bear population, well beyond the recovery zone boundaries. NPS and USFS land management plans are in place to assure the habitat needs of grizzly bears are met, and that habitat conducive to grizzly bear occupancy will be maintained in, and well beyond, the recovery zone. We make note of the fact that the grizzly bear population in and around Yellowstone has continued to grow and expand significantly with the current habitat management regime in place.

The best available science clearly demonstrates that the Yellowstone grizzly population is recovered. The Association believes it is an opportune time to celebrate the success of the ESA, and do so with a species like the Yellowstone grizzly which has taken exceptional efforts to recover. Furthermore, the USFWS has done an exemplary job of summarizing all of the information that supports delisting and we believe the agency should move expeditiously toward developing the Final Rule that initiates a change in status. Such a move would demonstrate to all concerned that collaborative conservation of our wildlife and their habitats can be successful, and the recovery and delisting of the Yellowstone grizzly bear is proof of the success of, and continued need for, the ESA.

Thank you for this opportunity to comment. Our membership requests that this letter be made part of the public record on this proposed rule.

Sincerely,



Terry Steinwand
WAFWA President

TS/LLK:cc

cc: WAFWA Directors
John Baughman, IAFWA
ID, MT and WY Congressional Delegations
ID, MT and WY Wildlife Commissions