

ROB BISHOP, UT  
CHAIRMAN  
DON YOUNG, AK  
LOUIE GOHMERT, TX  
DOUG LAMBORN, CO  
ROBERT J. WITTMAN, VA  
JOHN FLEMING, LA  
TOM McCLINTOCK, CA  
GLENN THOMPSON, PA  
CYNTHIA LUMMIS, WY  
DAN BENISHEK, MI  
JEFF DUNCAN, SC  
PAUL A. GOSAR, AZ  
RAÚL R. LABRADOR, ID  
DOUG LAMALFA, CA  
JEFF DENHAM, CA  
PAUL COOK, CA  
BRUCE WESTERMAN, AR  
GARRET GRAVES, LA  
DAN NEWHOUSE, WA  
RYAN ZINKE, MT  
JODY HICE, GA  
AUMUA AMATA COLEMAN RADEWAGEN, AS  
TOM MACARTHUR, NJ  
ALEX MOONEY, WV  
CRESENT HARDY, NV  
DARIN LAHOOD, IL

RAÚL M. GRIJALVA, AZ  
RANKING MEMBER  
GRACE F. NAPOLITANO, CA  
MADELEINE Z. BORDALLO, GU  
JIM COSTA, CA  
GREGORIO KILILI CAMACHO SABLAN, CNMI  
NIKI TSONGAS, MA  
PEDRO R. PIERLUISI, PR  
JARED HUFFMAN, CA  
RAUL RUIZ, CA  
ALAN LOWENTHAL, CA  
MATTHEW CARTWRIGHT, PA  
DON BEYER, VA  
NORMA J. TORRES, CA  
DEBBIE DINGELL, MI  
RUBEN GALLEGO, AZ  
LOIS CAPPS, CA  
JARED POLIS, CO  
Wm. LACY CLAY, MO

DAVID WATKINS  
DEMOCRATIC STAFF DIRECTOR

**U.S. House of Representatives**  
**Committee on Natural Resources**  
**Washington, DC 20515**

JASON KNOX  
STAFF DIRECTOR

September 27, 2016

The Honorable Daniel M. Ashe  
Director, U.S. Fish and Wildlife  
Department of the Interior  
1849 C St., NW  
Washington, D.C. 20240

Dear Director Ashe,

I appreciate the response of July 6 from your regional office director to my letter regarding concerns over the U.S. Fish and Wildlife Service (Service) proposal to remove Endangered Species Act (ESA) protections for grizzly bears in the Greater Yellowstone Ecosystem (GYE). I also appreciate your decision to reopen the public comment period on the proposed delisting rule for consideration of the peer review and documents pertaining to the states of Idaho, Montana, and Wyoming's plans to allow sport hunting for grizzly bears immediately upon delisting. However, significant uncertainty remains about whether or not GYE grizzly bears will be managed responsibly in a post-delisting environment because the Service has not made public proposed revisions to the draft GYE Grizzly Bear Conservation Strategy (Conservation Strategy).

As you know, the Conservation Strategy is the critical document that will guide management of GYE grizzlies should the delisting proposal become final. Therefore, it is imperative that it includes clear and enforceable commitments by federal and state agencies to ensure that the progress made to this point on grizzly bear recovery is not lost. It is my understanding from talking to numerous stakeholders that the Conservation Strategy has undergone significant revision since the final draft was released earlier this year, warranting additional review of the document by the public before it becomes final. I also understand that the views of the National Park Service, which manages approximately 40 percent of the Primary Conservation Area for grizzly bears and has played a pivotal role in the recovery of grizzly bears in the GYE, have not been adequately considered.

I recently received a letter from NPS in response to a series of questions I asked Yellowstone National Park Superintendent Dan Wenk about GYE grizzly bears. I have enclosed a copy of that letter for your consideration. Among other things, NPS raised significant concerns with the Service's specification of a minimum population size of 500 grizzly bears, the lack of strong standards to ensure connectivity of GYE grizzly bears with other populations, and the

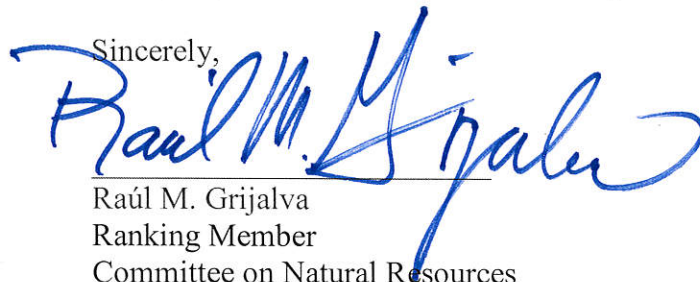
uncertainty of how a sharp increase in human-caused mortality through hunting would impact the population. These concerns are echoed in the peer review of the proposed rule, with reviewers writing that the issue of management to facilitate connectivity with other grizzly populations “is not adequately addressed,” that “overharvest and a potential subsequent lag in management response could drive bear numbers below the desired minimum populations size,” and that “there is no scientific basis for the lower limit of 500 bears,” a level that represents a 17 percent reduction from the Service’s most conservative estimate for the current population.<sup>1</sup> Finally, NPS expresses legitimate concerns about the impacts of allowing hunting within the John D. Rockefeller, Jr. Memorial Parkway and other areas adjacent to Yellowstone and Grand Teton National Parks on the visitor experience, the regional economy, and the core population of bears living within the parks.

For these reasons, I request the following:

1. Before finalizing a delisting rule for GYE grizzly bears, release and allow public comment on a revised final draft Conservation Strategy, including final state management plans.
2. Require that the Conservation Strategy and state management plans contain clear and enforceable measures to ensure the GYE grizzly population remains stable or increases and allow for connectivity to other populations, and that the conservation strategy adequately addresses the potential impacts of climate change and secures grizzly bear habitat on federal lands.
3. Ensure that the National Park Service retains its authority to manage the John D. Rockefeller, Jr. Memorial Parkway as a National Park Service Unit, including by prohibiting the hunting of grizzly bears, and prohibit the hunting of grizzly bears on lands adjacent to the Parks and within the Primary Conservation Area.

Without these conditions being met, it seems unlikely that grizzly bear recovery will be a lasting success, and therefore I will not be able to support delisting. Thank you for your attention to this matter. If you have any questions, please have your staff contact Matt Strickler on the Natural Resources Committee Democratic Staff at (202) 225-6065. I look forward to your response.

Sincerely,



Raúl M. Grijalva  
Ranking Member  
Committee on Natural Resources

Cc: The Honorable Sally Jewell, Secretary of the Interior  
The Honorable Jonathan Jarvis, Director, National Park Service

---

<sup>1</sup> *Scientific Peer Review for Greater Yellowstone Grizzly Bears*. Amec, Foster, Wheeler – Houston, TX. June 9, 2016. Available online: [https://www.fws.gov/mountain-prairie/es/07142016\\_GrizzlyBearPeerReview.pdf](https://www.fws.gov/mountain-prairie/es/07142016_GrizzlyBearPeerReview.pdf)