

**Peer Review Plan:** Species Status Assessment for the Grizzly Bear (*Ursus arctos horribilis*) in the Lower-48 States

**Timeline of the Peer review (estimated):**

**Draft documents to be disseminated:** August 2023

**Peer review to be initiated:** August 2023

**Peer review to be completed by:** September 2023

**Determination regarding species' status expected:** This Species Status Assessment (SSA) help will inform future agency decisions, including two 12-month findings on petitions from the States of Montana and Wyoming to designate and delist the Northern Continental Divide Ecosystem and the Greater Yellowstone Ecosystem grizzly bear populations as Distinct Population Segments (DPS)s, respectively.

**About the Peer Review Process:**

In accordance with our July 1, 1994, peer review policy (59 FR 34270), the U.S. Fish and Wildlife Service's August 22, 2016, Director's Memo on the Peer Review Process, and the Office of Management and Budget's December 16, 2004, Final Information Quality Bulletin for Peer Review, we will solicit independent scientific reviews of the information contained in our SSA for the Grizzly Bear in the Lower-48 States.

The U.S. Fish and Wildlife Service (Service) will request peer review from three or more independent experts. To enhance the objectivity of the review, the Science Applications program, rather than the Ecological Services program, will serve as the point-of-contact for the peer reviewers. In 2020, the Service used a contractor to conduct peer review on a previous version of the SSA. The contractor selected 5 peer reviewers. Science Applications will request reviews from these same peer reviewers because this is an updated analysis, and the bulk of the document is unchanged. During the initial peer review process, the Contractor considered the following criteria when selecting reviewers:

- **Expertise:** The reviewer should have knowledge of or experience with grizzly bears or similar species biology.
- **Independence:** The reviewer should not be employed by the Service. Academic, consulting or government scientists should have sufficient independence from the Service if the government supports their work.
- **Objectivity:** The reviewer should be recognized by his or her peers as being objective, open-minded, and thoughtful. In addition, the reviewer should be comfortable sharing his or her knowledge and perspectives and openly identifying his or her knowledge gaps.
- **Conflict of Interest:** The reviewer should not have any financial or other interest that conflicts or that could impair his or her objectivity or create an unfair competitive advantage. If an otherwise qualified reviewer has an unavoidable conflict of interest, the Service may publicly disclose the conflict.

Peer reviewers were selected based on their ability to provide expertise and contribute to a diversity of scientific perspectives relevant to the SSA for the Grizzly Bear in the Lower-48

States. We will not be providing financial compensation to peer reviewers. After completion of the peer review, we will make the peer reviewers' comments and conflict of interest forms available to the public.

Science Applications will provide each peer reviewer with information explaining their role and instructions for fulfilling that role, the draft SSA, and a list of citations, as necessary. The purpose of seeking independent peer review is to ensure use of the best scientific and commercial information available and to maximize the quality, objectivity, utility, and integrity of the information upon which the report is based, as well as to ensure that reviews by recognized experts are incorporated into the SSA process. Peer reviewers will be advised that they are not to provide advice on policy. Rather, they should focus their review on identifying and characterizing scientific uncertainties. Peer reviewers will be asked to answer questions pertaining to the logic of our assumptions, arguments, and conclusions and to provide any other relevant comments, criticisms, or thoughts.

Most of our updates to the SSA are focused in chapters 5, 6, and 7, and are highlighted in track changes. Although peer reviewers are welcome to review the entire document, we are most interested in review of the revised sections. Specific questions put to the reviewers include the following:

1. Does the SSA provide adequate review and analysis of the factors relating to the overall viability of grizzly bears in the lower-48 (e.g., demographics, habitat, disease and predation, and genetics) and, if not, what information is missing and how is it relevant?
2. Does the SSA provide accurate and adequate review and analysis of the current and projected future condition of the species? If not, what information is missing and how is it relevant?
3. Does the SSA provide adequate review and analysis of stressors and other influences on grizzly bears in the lower-48 states? If not, what information is missing and how is it relevant?
4. Are there any significant oversights, omissions, or inconsistencies in our SSA?
5. Are the statements we make about current and future condition logical and supported by the evidence we provide?
6. Did we include all the necessary and pertinent literature to support our assumptions/arguments/conclusions?
7. Are there demonstrable errors of fact or interpretation? Please provide the specifics regarding those particular concerns.

Peer reviewers will provide individual, written responses to Science Applications, who will relay them to the Service. Peer reviewers will be advised that their reviews, including their names and affiliations, will: (1) be included in the decisional record of our determinations regarding this species' status (i.e., final rules or withdrawals); and (2) be available to the public once all reviews are completed. We will summarize and respond to the issues raised by the peer reviewers in the record supporting our recommendations.

### **About Public Participation**

The peer review process will be initiated shortly. We strongly encourage that public comments on the approach of this peer review be submitted by August 1, 2023, in order to allow enough time for processing and consideration. However, we will accept comments on the peer review plan throughout the SSA process.

**Contact**

For more information, contact Sean Finn, at 208-387-1315 or [sean\\_finn@fws.gov](mailto:sean_finn@fws.gov).

Page	Chapter	Comment	Created By	Created	Reviewer Email	Review Type
233		Why is the BE rated "moderate" in large intact blocks of land since 98% is designated wilderness?	chrisservheen@gmail.com	8/22/2023 15:23	chrisservheen@gmail.com	Peer Review
244		My opinion is resilience under scenario 1 would be "Low" in the GYE and the "Low" in the NCDE	chrisservheen@gmail.com	8/22/2023 15:25	chrisservheen@gmail.com	Peer Review
15		I believe the most likely option is #2 and that this would result in decline of the GYE population as bears outside the DMA are removed at accelerated rates with delisting resulting in population decline inside the DMA as many bears inhabit both areas. This would make the GYE decline to moderate instead of high. A similar situation would likely happen in the NCDE with declines inside the DMA due to aggressive removal programs for grizzlies outside the DMA, similar to what the state is doing with wolves. That is exactly what is in the draft MT state grizzly plan and look at the MT proposal to increase the area opening to wolf trapping and snaring all around these ecosystems during the time that some bears are still out of their dens.	chrisservheen@gmail.com	8/14/2023 19:23	chrisservheen@gmail.com	Peer Review
60		There is a statement: "...it is likely that there are few resident grizzly bears in the lower 48 states outside these areas." It is unclear what you are talking about here. Connectivity areas or outside occupied range? In either case, I strongly disagree. There are likely hundreds of grizzly bears outside "occupied range" on this map either for all of their lives or as part of their home range. This statement is wrong and misleading. Every grizzly is listed as of now and they are all protected against illegal take. This statement in this document gives those who wish to hound hunt black bears or trap and snare wolves with bait license to do these things outside "occupied range" and this is wrong on so many counts. This wording should be struck from this document.	chrisservheen@gmail.com	8/21/2023 17:57	chrisservheen@gmail.com	Peer Review
230		The NCDE habitat management by the USFS is questionable and uncertain as mentioned several times previously. The uncertainty of the USFS in regards to them maintaining their commitment to the NCDE CS habitat standards makes the "large blocks of land" issue "Moderate" at present and "Low" if they approve developments that depart from their commitments in the NCDE CS. These tables and results should reflect the uncertainty of what the USFS will do in this regard.	chrisservheen@gmail.com	8/22/2023 15:16	chrisservheen@gmail.com	Peer Review
76		Many other groups have made significant contributions. NWF was a partner in the Bitterroot reintroduction effort and they have purchased many grazing allotments from willing sellers in many important areas of grizzly habitat.	chrisservheen@gmail.com	8/21/2023 18:16	chrisservheen@gmail.com	Peer Review
15-17		This scenario system works in concept but it seems to me that the actual application will be much different that the results presented in Table 3. It seems likely that there will different conservation applied in each ecosystem. For example, I can see conservation effort declining in the GYE and NCDE and surrounding areas if desliting of the NCDE and GYE occurred. This would then impact the conservation of the BE, CYE, and SE because natural connectivity between these ecosystems would be reduced or eliminated with state policies to eliminate bears outside recovery areas and more unregulated wolf trapping and snaring and increased black bear hound hunting. There may be continued conservation effort inside these two ecosystems but the conservation success of all the other ecosystems would decline.	chrisservheen@gmail.com	8/14/2023 19:15	chrisservheen@gmail.com	Peer Review
247		My opinion is resilience under scenario 2 low in the GYE and moderate in the NCDE. I think you underestimate the danger of this scenario.	chrisservheen@gmail.com	8/22/2023 15:28	chrisservheen@gmail.com	Peer Review
159-160		You stat that there are "some measures in place to limit potential incidental take" however you fail to state that these measures only apply to some areas where grizzlies are known to be present and that MT increased the areas where such risks can occur in 2023. There are no effective measures to prevent such mortalities in Idaho. This is clear evidence that these MT and ID "measures" are incomplete and ineffective. You should state this clearly in this section.	chrisservheen@gmail.com	8/22/2023 12:13	chrisservheen@gmail.com	Peer Review

181-182, 189	You speak of the management actions in place to enhance connectivity potential between the NCDE and the GYE and refer to "protocol" to enhance connectivity. Yet you do not speak to the current management direction in MT to increase the areas within these potential connectivity areas that are open to wolf trapping and snaring while bears are still out of their dens and to hound hunting of black bears in these same connectivity areas that will put any grizzlies in these connectivity areas at risk. Such actions by MT will negate any connectivity management efforts. These issues should be added to this section since these actions by MT significantly reduce the possibility of connectivity between the NCDE and the GYE and also reduce any connectivity potential between the BE and the GYE, NCDE, CY, and SEL. MT actually increased the areas subject to these risks in 2023 while then grizzly is still listed. One needs to recognize that if grizzlies were delisted, the behavior of MT in managing risk to grizzlies in connectivity areas will likely become even worse.	chrisservheen@gmail.com	8/22/2023 14:36	chrisservheen@gmail.com	Peer Review
169	Recalibration is introduced but not explained or applied. Why is that?	chrisservheen@gmail.com	8/22/2023 13:32	chrisservheen@gmail.com	Peer Review
83-84	You talk about chao2 versus the IMP population estimates and compare the percentage of indy males and females, but you do not really talk about how these percentages relate to recalibration. This section seems very incomplete and it does not address how mortality limits will be set and why with the IMP versus chao2. I suggest an expansion of this section to speak directly to the issue of mortality limits under chao2 versus IMP with a full explanation of how and why you propose these mortality limits. Table 9 refers to chao2 limits but what about the limits under IPM. I must have missed something as this section seems to be missing the entire re-calibration issue.	chrisservheen@gmail.com	8/21/2023 18:22	chrisservheen@gmail.com	Peer Review
89	You talk about the TRU mortalities in the NCDE but Table 11 does not list them at all but Table 9 does include them for the GYE. Why is that? You need to explain how you can talk about calculated unreported mortalities but not list them in the table. This seems incomplete.	chrisservheen@gmail.com	8/21/2023 18:34	chrisservheen@gmail.com	Peer Review
159	I do not think you can say that there are measures in place to limit potential mortality due to wolf trapping and snaring and hound hunting of black bears because such activities occur while many bears are out of the den and in many areas where grizzly bears are present. This is particularly the case in many areas where grizzly bears are present in Idaho and the connectivity areas between all ecosystems where such lethal activities are permitted and grizzly bear presence if documented. This should be changed to say "These wolf trapping and snaring activities are a serious risk to grizzly bears in many areas of their distribution and will likely result in continued mortality to grizzly bears. In addition, there is little if any effective reporting of these mortalities. These mortalities constitute a serious threat to grizzly bears and to the ability of bears to move between ecosystems to enhance the genetic and demographic health and restoration of populations."	chrisservheen@gmail.com	8/22/2023 12:09	chrisservheen@gmail.com	Peer Review
162	You do not state that MT under SB 295, after delisting, will allow permits to be issued to persons who believe that a grizzly bear(s) is "threatening" humans. Threatening is not defined so this will allow a permit to be issued to kill a bear even though self-defense is not necessary. You need to add this.	chrisservheen@gmail.com	8/22/2023 13:31	chrisservheen@gmail.com	Peer Review
220	You need to speak to the issue of unregulated mortality outside the core area of the NCDE. The draft MT grizzly management plan promotes intolerance and speaks to promoting the killing non-conflict bears on both public and private lands outside the NCDE just because they exist. This is a policy of enforced killing of grizzly bears anywhere outside the NCDE that can only have a negative impact on bears inside the NCDE because many bears live in both areas. You need to address this by speaking directly to this policy is the state grizzly management plan that will directly impact bears inside the NCDE immediately upon delisting. You cannot ignore what is in the state grizzly management plan in this SSA document.	chrisservheen@gmail.com	8/22/2023 15:08	chrisservheen@gmail.com	Peer Review
43	Table 5 would benefit with the addition of the sample size for the numbers of males and females in each ecosystem used to calculate average home range sizes.	chrisservheen@gmail.com	8/21/2023 16:20	chrisservheen@gmail.com	Peer Review
44	Same comment on Table 6 as Table 5. Suggest N = xx for each ecosystem.	chrisservheen@gmail.com	8/21/2023 17:14	chrisservheen@gmail.com	Peer Review

146		I do not think you can say "the habitat restrictions that are in place are sufficient to maintain the resiliency of the NCDE currently and into the future", while the threat of the USFS departing from the NCDE habitat commitments is still happening. The FNF seems to be continuing their plans to approve the Holland Lake expansion despite intense efforts to show them this is a violation of the USFS commitment to maintain habitat inside the recovery zone. If this is happening while the grizzly is still listed, one can only imagine what they would do if it was delisted. I suggest you change this wording to state that the habitat protections set in place for the NCDE (and other ecosystems) are now in doubt due to the actions of the USFS.	chrisservheen@gmail.com	8/22/2023 12:00	chrisservheen@gmail.com	Peer Review
219		I disagree with the interpretation that the habitat protections in the CS are sufficient to ensure that threats to the NCDE grizzly habitat will not threaten grizzly bears. The Holland Lake expansion that would put 35000+ additional user days per year into prime grizzly habitat on public lands is a textbook example of why. The USFS has not abandoned this development idea and in fact shows every indication that they will approve this development and other such developments in the NCDE recovery area in direct violation of their commitment not to do so in the NCDE CS. You need to address this directly in this document by stating that if the USFS continues to plan on approving such developments in direct violation of their commitment in the NCDE CS that this will directly threaten grizzly recovery in the NCDE. If you do not state this, it is likely that such USFS actions to depart from their commitments in every grizzly management document will accelerate.	chrisservheen@gmail.com	8/22/2023 14:46	chrisservheen@gmail.com	Peer Review
Overall		As I indicated in my previous review of this document in 2020, I found the effort to be very thorough and captures the reality of grizzly bear conservation in the lower 48. I've suggested a very few very recent publications that might be relevant to this update. I was asked to only review new additions from that 2020 document, and that is what I did.	mproctor	9/18/2023 13:26	mproctor@netidea.com	Peer Review
140	5	"Limitations on open motorized routes ... We are reevaluating the current method used to measure (i.e., linear miles or road densities) and meet this intent due to recent proposed activity on Federal lands". MP comment - Schwartz et al 2010 and Proctor et al 2023 Wildlife Monograph suggests that the proportion of secure habitat (> 500m from an open road) is also an important metric. And that some configurations of even low road density – may result in many small patches of secure habitat and thus be detrimental. New possible citation: Proctor, M. F., C. T. Lamb, J. Boulanger, A. G. MacHutchon, W. F. Kasworm, D. Paetkau, E. C. Palm, M. S. Boyce, and C. Servheen. 2023. Berries and Bullets: influence of food and mortality risk on grizzly bears in British Columbia. Wildlife Monographs, wmon.1078.	mproctor	9/18/2023 12:51	mproctor@netidea.com	Peer Review
140	5	"Limitations.....We are reevaluating the current method used to measure (i.e. linear miles or road density)...." MP comment - Same comment as above about Schwartz et al 2010 and Proctor et al. 2023 and secure habitat and road configuration being an important metric in access management.	mproctor	9/18/2023 12:51	mproctor@netidea.com	Peer Review
212	5	"Proctor et al. (2012, entire) used several metrics ...FURTHER IN PARA... MP - These are examples of migration.... you might want to add a recent report (in prep of a publication) Proctor et al. 2022 that documents the recovery of the Canadian South Selkirks and has copius evidence of increased connectivity (immigrants and the results of their breeding – 9 immigrants with 27 offspring) into the Canadian South Selkirk – part of your Recovery Zone)	mproctor	9/18/2023 13:14	mproctor@netidea.com	Peer Review
		New possible citation:: Proctor, M. F., A. G. MacHutchon, J. Boulanger, D. Paetkau. 2022. Evaluating grizzly bear conservation management: quantifying recovery in the Canadian South Selkirk population. Trans-border Grizzly Bear Project, Kaslo BC.				

237	5	<p>“Different plant species respond differently to climate.... Berry species have also been identified as an important food resource for grizzly bears, especially in the SE and CYE (see Food Resources in the CYE and SE of this report for more information).</p> <p>MP - Might add something like: Snow pack, and several other climate related variables were predicted to be affected by climate change, and several of these factors have a significant affect on development of huckleberry patches important for bears (Proctor et al. 2023).”</p> <p>MP - The Proctor et al 2023 huckleberry model has precipitation as snow in winter as one of its top variables, Climate change will likely have an impact on this variable (and several others) suggesting that huckleberry plants and patches with huckleberries in them, may be impacted. Proctor et al. did not consider climate change. so this citation just makes the direct line to snow &amp; huckleberry patches.</p>	mproctor	9/18/2023 13:14	mproctor@netidea.com	Peer Review
156-157	5	<p>Possibly add in comment from Proctor et al. 2023 Berries &amp; Bullets paper here about how open roads can reduce the effectiveness of foods for GBs</p> <p>In paragraph “Motorized recreation impacts grizzly bears through increased mortality.....(Proctor et al. 2019, p18”</p> <p>MP - comment - You might add something like this here or in this paragraph somewhere.</p> <p>“Recent research shows that otherwise important hyperphagic food resources in non-secure habitat near open roads do not contribute significantly to female bear density (also fitness, reproductive success), see Figure 19b in Proctor et al. 2023).”</p> <p>MP- This recent work clarifies the how the value of important foods in non-secure habitat do not get translated into bear densities – the mechanism in action.</p>	mproctor	9/18/2023 13:01	mproctor@netidea.com	Peer Review
137	5	<p>NEW PARAGRAPH about new "Footprint" approach to secure habitat calculation</p> <p>How does the new footprint approach account for very busy sites and the area immediately around them Is it built into the 500m buffer that a road gets?</p> <p>One idea is that one might use a larger buffer around very busy sites – where many people might fan out to hike in larger numbers than the back country or some decay function of influence over this larger buffer, such as around a hotel site that had hiking trails around it.</p>	mproctor	9/18/2023 12:51	mproctor@netidea.com	Peer Review
158	5	<p>“The habitat-based recovery criteria include an objective to limit increases in the number and capacity of new developed recreation sites on Federal lands for overnight use by the public during the non-denning season to one per decade per BMU. However, we are currently re-evaluating the need for limitations on the size of any new or current developed site expansion under this objective due to recent proposals that are significantly larger in magnitude than those on which this objective was based. “</p> <p>MP - This is an interesting issue, increasing developments, even 1 per decade may seem small and slow, but as this statement indicates, large developments may undue what has been secure habitat and have a significant impact over a fairly large area. large developments may not only influence a large area increasing mortality risk and displacing bears in otherwise high quality habitat with more people, but can influence connectivity between ecosystems. Seems like an issue that requires some thought and a vision of long term impacts that might cumulate. It has been habitat based management that has facilitated recovery, something to keep a close watch on.</p>	mproctor	9/18/2023 13:01	mproctor@netidea.com	Peer Review
17		P 1. the words “beardensities” are run together	van Daele, Larry	pdf received 9/26/23	kodiaklarry@gmail.com	Peer Review
17		P. 2 the words “Statebased” are run together	van Daele, Larry	pdf received 9/26/23	kodiaklarry@gmail.com	Peer Review
41		P. 2 last sentence – “I&E programs aimed...” – I don’t recall seeing “I&E” defined in text (although it is defined in the acronyms section)	van Daele, Larry	pdf received 9/26/23	kodiaklarry@gmail.com	Peer Review
176		Last paragraph – consider including the scientific name for the Kodiak brown bear species	van Daele, Larry	pdf received 9/26/23	kodiaklarry@gmail.com	Peer Review

188	p. 1 – “pronghorn sheep” should probably be changed to “bighorn sheep”. Throughout this section also double check to assure you have included scientific names where appropriate	van Daele, Larry	pdf received 9/26/23	kodiaklarry@gmail.com	Peer Review
82 and 167	p. 1 the bold warning: “Error! Reference source not found” should be either deleted or corrected	van Daele, Larry	pdf received 9/26/23	kodiaklarry@gmail.com	Peer Review
42	p. 1 “Adult grizzly bears are normally solitary except when breeding or have dependent young” – Do you have instances where bears congregate around high density food sources?	van Daele, Larry	pdf received 9/26/23	kodiaklarry@gmail.com	Peer Review
0	First and foremost, it is evident that your team has been busy during the past 3 years seriously considering the comments you received on Version 1.0 and incorporating new data analyses and literature citations into this revision. I looked at my original editorial suggestions and this revision addresses 72 of my 76 comments (94.7%). Only 2 of those unaddressed concerns are things I still consider worth looking at to give the readers a tool to better to evaluate the prevalence bear conflicts: 1) documentation of the number of human maulings/mortalities by grizzlies and the general circumstances leading up to them; and,2) documentation of the number of livestock depredation claims per year, who paid for them, and where they occurred. By including such data in this document, it will provide an unbiased source of information from which meaningful discussions can emanate	van Daele, Larry	pdf received 9/26/23	kodiaklarry@gmail.com	Peer Review
66	need to include the horizontal hash marks in your key for Zone 3	van Daele, Larry	pdf received 9/26/23	kodiaklarry@gmail.com	Peer Review





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**Re: Request For Review of the Draft Grizzly Bear SSA v2.1**

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**From** Chris Servheen <chrisservheen@gmail.com>

**Date** Tue 8/22/2023 2:11 PM

**To** Hansen, Craig <Craig\_Hansen@fws.gov>

**Cc** Finn, Sean <Sean\_Finn@fws.gov>

I have completed my review of the SSA document on grizzly bears. I assume you have it as my comments should be saved real time. **Please confirm that you have these comments.**

I believe the document is an excellent summary of the information for grizzly bears and is well written and well organized. It does display the current status of the species, however it has a serious weakness in that it does not really address the regulatory mechanisms that are or are not in place. In particular, it fails to recognize that current USFS policy and state regulatory policies are in flux and are changing on almost a daily basis for the worse for grizzly bears. Thus, many of the mortality regulatory mechanisms at the state level and the federal habitat regulatory mechanisms implemented by the USFS are either being eroded (states) or being ignored (USFS). The result is that many of these mechanisms that are used in this document to decide if populations are resilient and/or secure are not actually in place and instead are being changed by these agencies. This means **some** conclusions about species current and future status are flawed and incorrect. I have noted in my comments several times that this needs to be stated in this document.

I am happy to discuss it if you like.

My best,

Chris

On Mon, Aug 14, 2023 at 4:21 PM Hansen, Craig <[Craig\\_Hansen@fws.gov](mailto:Craig_Hansen@fws.gov)> wrote:

Dear Chris Servheen,

The U.S. Fish and Wildlife Service requests your help by serving as a peer reviewer of our draft Species Status Assessment report for the Grizzly Bear SSA v2.1. We use the Species Status Assessment (SSA) process to improve transparency and ensure we are using the best available information to inform Endangered Species Act (ESA) decisions and peer review of the scientific assessment is part of that process.

As a peer reviewer, we are requesting your review of the scientific information relating to your area of expertise. Specifically, we would like your comments on the quality of the scientific information and analyses and whether the best available information was used. This may include identifying any oversights, omissions, and inconsistencies; providing advice on reasonableness of judgments made from the scientific evidence; helping us ensure that scientific uncertainties are identified and characterized; providing advice on the overall strengths and limitations of the scientific data used in the document; and informing us of any scientific information that we did not use.

If you are willing to serve as a peer reviewer, we would appreciate comments by 09/10/2023, to ensure adequate time to incorporate them into our final report. As you review the document, please note that this draft SSA report does not result in or predetermine a decision by the Service under the Act. This document is strictly a characterization of the viability of the species.

The document is located here:

[20230804 DRAFT V2.1 SSA for grizzly bear in the lower-48 States.docx](#)

You can enter your responses here:

[Grizzly Bear SSA v2.1](#)

The point of contact for this report is Sean Finn in our Region 6 Science Applications. If you have questions specific to the SSA report or would like any of the literature cited, please feel free to contact Sean Finn for any species-specific information at 208 426-2697, or [Sean.Finn@fws.gov](mailto:Sean.Finn@fws.gov).

Attached are instructions on how to gain access as well as tips for entering responses.

Thank you very much for your time, and please reach out if you have questions related to the peer review process.

Sincerely,

Craig Hansen

26 September 2023

Sean Finn  
Science Coordinator  
Science Applications Program  
US Fish and Wildlife Service, Mountain Prairie Region  
230 North Collins Road, Building 4  
Boise, ID 83702

Dear Sean,

Thank you for the opportunity to comment on the edits made to the Species Status Assessment for Grizzly Bears in the Lower-48 States (Version 2.1). While I would have preferred to comment using the established portal, despite several efforts I was unable to access it, so I hope you can accept these comments via email.

First and foremost, it is evident that your team has been busy during the past 3 years seriously considering the comments you received on Version 1.0 and incorporating new data analyses and literature citations into this revision. I looked at my original editorial suggestions and this revision addresses 72 of my 76 comments (94.7%). Only 2 of those unaddressed concerns are things I still consider worth looking at to give the readers a tool to better to evaluate the prevalence bear conflicts:

- 1) documentation of the number of human maulings/mortalities by grizzlies and the general circumstances leading up to them; and,
- 2) documentation of the number of livestock depredation claims per year, who paid for them, and where they occurred.

By including such data in this document, it will provide an unbiased source of information from which meaningful discussions can emanate.

Below are page specific comments on Version 2.1.

Page 17, Paragraph 1 – the words “beardensities” are run together  
Paragraph 2 – the words “Statebased” are run together

Page 41, Paragraph 2, last sentence – “I&E programs aimed...” – I don’t recall seeing “I&E” defined in text (although it is defined in the acronyms section)

Page 42, Paragraph 1 – “Adult grizzly bears are normally solitary except when breeding or have dependent young” – Do you have instances where bears congregate around high density food sources?

Page 66 – need to include the horizontal hash marks in your key for Zone 3

Page 82 and 167, Paragraph 1 – the bold warning: “**Error! Reference source not found**” should be either deleted or corrected

Page 176, Last paragraph – consider including the scientific name for the Kodiak brown bear subspecies

Page 188, Paragraph 1 – “pronghorn sheep” should probably be changed to “bighorn sheep”. Throughout this section also double check to assure you have included scientific names where appropriate.

That’s it. As noted above, I am impressed with the work your team has done to develop and refine this document and I sincerely appreciate being invited to play a small role in this on-going effort to revitalize grizzlies in the lower-48 and help people learn how to co-exist with these magnificent creatures.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Larry Van Daele', with a long horizontal flourish extending to the right.

Larry Van Daele  
3401 Antone Way  
Kodiak, AK 99615

[kodiaklarry@gmail.com](mailto:kodiaklarry@gmail.com)

907-654-8822 (cell/text)

[View results](#)

Respondent

430

Anonymous

19:24

Time to complete

## Conflict of Interest Disclosure

1. ID Number \*

2697

2. SSA Name \*

Grizzly Bear SSA v2.1

3. SSA Point of Contact Email (the [@fws.gov](#) address provided in request email) \*

Sean\_Finn@fws.gov

4. Your Name \*

Michael Proctor

5. Telephone (work/professional) \*

250-353-8072

6. Address (work/professional) \*

PO Box 606 Kaslo, BC Canada V0G 1M0

7. Email Address (work/professional) \*

mproctor@netidea.com

## 8. Current Employer \*

Birchdale Ecological

## Instructions

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Such interests could include an individual's stock holdings in excess of \$10,000 in a potentially affected company or being an officer, director, or employee of the company. Serving as a consultant to the company could constitute such an interest if the consulting relationship with the company could be directly affected or is directly related to the subject matter of the regulatory process.

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## Employment

If the information received by the Service through the peer review process were to provide the basis for government regulatory action or inaction with respect to the species assessed within the pertinent draft SSA report --

9. If you are employed or self-employed, could your current employment or self-employment (or your spouse's current employment or self-employment) be directly affected? \*

- Yes
- No
- Not applicable

10. To the best of your knowledge, could any financial interests of your (or your spouse's) employer or, if self-employed, your (or your spouse's) clients and/or business partners be directly affected? \*

- Yes
- No
- Not applicable

11. If you are an officer, director or trustee of any corporation or other legal entity, could the financial interests of that corporation or legal entity be directly affected? \*

- Yes
- No
- Not applicable

12. If you are a consultant (whether full-time or part-time), could there be a direct effect on any of your current consulting relationships? \*

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- No
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- Yes
- No
- Not applicable

14. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

I receive funding for my work in Canada from 2 US ENGOs and the money goes through the University of Montana and Hilary Cooley is a PI for these grants My work is on grizzly bears in BC Canada and is not related to the status of GBs in the US I was an original reviewer of the 2021 GB SSA. My ability to provide an unbiased review is not affected by these relations. I review scientific papers by GB biologists that work for the FWS with no bias. I speak the truth to everyone. I am basically self employed

### Employment (continued)

15. If you are or have ever been a U.S. Government employee (either civilian or military), to the best of your knowledge, are there any federal conflict of interest restrictions that may be applicable to your service in connection with this peer review? \*

- Yes
- No
- Not applicable

16. If you are a U.S. Government employee, are you currently employed by the Service? \*

- Yes
- No
- Not applicable

17. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

### Investment Interests

Taking into account stocks, bonds, and other financial instruments and investments including partnerships (but excluding broadly diversified mutual funds and any investment or financial interest valued at less than \$10,000), if the information received by the Service through the peer review process were to provide the basis for government regulatory action or inaction with respect to the species assessed within the pertinent draft SSA report --

18. Do you or your spouse or minor children own directly or indirectly (e.g., through a trust or an individual account in a pension or profit-sharing plan) any stocks, bonds or other financial instruments or investments that could be affected, either directly or by a direct effect on the business enterprise or activities underlying the investments? \*

- Yes
- No
- Not applicable



19. Do you have any other significant financial investments or interests such as commercial business interests (e.g., sole proprietorships), investment interests (e.g., stock options), or personal investment relationships (e.g., involving parents or grandchildren) that could be affected, either directly or by a direct effect on the business enterprise or activities underlying the investments? \*

- Yes
- No
- Not applicable

20. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

### Property Interests

Taking into account real estate and other tangible property interests, as well as intellectual property (patents, copyrights, etc.) interests, if the information received by the Service through the peer review process were to provide the basis for government regulatory action or inaction with respect to the species assessed within the pertinent draft SSA report --

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- No
- Not applicable

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- Yes
- No
- Not applicable

25. If you answered "Yes" to the question above, briefly describe the circumstances.

### Research Funding and Other Interests (continued)

26. Is the central purpose of the proposed rule for which this disclosure form is being prepared a critical review and evaluation of your own work or that of your employer? \*

- Yes
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- Yes
- No
- Not applicable

30. If you answered "Yes" to any of the questions above, briefly describe the circumstances.

[View results](#)

Respondent

431

Anonymous

07:02

Time to complete

## Conflict of Interest Disclosure

1. ID Number \*

2696

2. SSA Name \*

Grizzly Bear SSA v2.1

3. SSA Point of Contact Email (the [@fws.gov](mailto:fws.gov) address provided in request email) \*

Sean\_Finn@fws.gov

4. Your Name \*

Christopher Servheen

5. Telephone (work/professional) \*

4062406506

6. Address (work/professional) \*

206 Ben Hogan Dr. Missoula MT 59803

7. Email Address (work/professional) \*

chrisservheen@gmail.com

## 8. Current Employer \*

retired

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[View results](#)

Respondent

455

Anonymous

03:53

Time to complete

## Conflict of Interest Disclosure

1. ID Number \*

2. SSA Name \*

3. SSA Point of Contact Email (the [@fws.gov](mailto:fws.gov) address provided in request email) \*

4. Your Name \*

5. Telephone (work/professional) \*

6. Address (work/professional) \*

7. Email Address (work/professional) \*

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