

**From:** [Shoemaker, Justin](#)  
**To:** [Jennifer Servis](#)  
**Subject:** Fwd: Yellowstone bison  
**Date:** Monday, June 15, 2015 8:14:47 AM  
**Attachments:** [Comparison of 3 Bison Petitions.docx](#)

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----- Forwarded message -----

**From:** **Gober, Joy** <[joy\\_gober@fws.gov](mailto:joy_gober@fws.gov)>  
**Date:** Wed, Jan 14, 2015 at 11:58 AM  
**Subject:** Re: Yellowstone bison  
**To:** "Fahey, Bridget" <[bridget\\_fahey@fws.gov](mailto:bridget_fahey@fws.gov)>  
**Cc:** Justin Shoemaker <[justin\\_shoemaker@fws.gov](mailto:justin_shoemaker@fws.gov)>

Bridget, Thanks. I've attached another table (I only seem to be able to organize my thoughts in tables) that compares the 3 petitions and associated findings for the first two. I think the primary difference in our thought process for the 2009 and 2014 petitions is due to the scope of the petitions.

- The 2009 petition was directed at wild plains bison rangewide and/or each of 4 major ecotypes/DPSs, with Yellowstone NP part of a proposed Rocky Mountain DPS. The 2014 petition is directed solely at a proposed DPS of plains bison in Yellowstone NP.
- The 2009 petition included citations through 2009, with two additional citations later submitted from 2010. The 2014 petition has at least 32 new citations that are references from 2010 or later.
- The 2014 petition has 3 new citations in their DPS discussion.

Joy

On Wed, Jan 14, 2015 at 7:47 AM, Fahey, Bridget <[bridget\\_fahey@fws.gov](mailto:bridget_fahey@fws.gov)> wrote:

Wow, Joy, thanks for doing this. Excellent, thorough, and very helpful. One key question I think we need to answer, since we already said in the wild plains bison 12-month finding that we didn't think Yellowstone was a valid DPS -- did this petition present anything new that we did not know or consider at that time? I think we need to find some sort of off-ramp for petitions that continually request that we re-evaluate issues that we already addressed.

**Bridget Fahey**  
**Chief of Endangered Species**  
**Mountain Prairie Region**  
**(303) 236-4258**

On Tue, Jan 13, 2015 at 4:27 PM, Gober, Joy <[joy\\_gober@fws.gov](mailto:joy_gober@fws.gov)> wrote:  
Justin,

Please see the attached for my two cents worth. I hope it helps. I always enjoy working on *Bison bison bison*,  
Thanks!

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### Comparison of Bison Petitions and Findings

Issue	1999 Petition/2007 Finding	2009 Petition/2011 Finding	2014 Petition
Scope	Bison in Yellowstone NP	Wild plains bison rangewide	Bison in Yellowstone NP
Proposed Designation	List as subspecies or a DPS	List rangewide or list each of four major ecotypes (northern Great Plains, southern Great Plains, Rocky Mountains, Great Basin-Colorado Plateau) as four DPS	Endangered DPS
Petition Citations	none	Extensive citations through 2010	Extensive citations through 2014; at least 32 new citations (2010–2014)
Discreteness	<ul style="list-style-type: none"> <li>Only US herd that has remained wild since prehistoric times,</li> <li>Unfenced,</li> <li>Migration from Grand Teton herd is rare</li> <li>Therefore, may be discrete</li> </ul>	<ul style="list-style-type: none"> <li>Multiple bison introductions &amp; translocations between ecotypes,</li> <li>Geographically separate ecotypes, but managed as essentially one metapopulation,</li> <li>Therefore, not discrete</li> </ul>	<ul style="list-style-type: none"> <li>Geographically isolated since 1902 introductions; some migration out of YNP to Grand Teton herd, but not from Grand Teton into YNP,</li> <li>Wild since prehistoric times,</li> <li>No genetic introgression with cattle,</li> <li>Therefore, discrete (3 new citations)</li> </ul>
Significance	<ul style="list-style-type: none"> <li>Only US herd that has remained wild since prehistoric times,</li> <li>Loss of the population might result in a significant gap in the current range of non-introgressed bison,</li> <li>Genetically significant,</li> <li>Therefore may be significant</li> </ul>	Not discrete, so did not evaluate significance. However, note that bison is a generalist regarding habitat requirements and each ecotype consists of multiple herds managed under different Federal, State, municipal or private regimes and the complete loss of bison in any ecotype is very unlikely. No ecotype represents the only surviving natural occurrence of taxon and due to multiple, diverse origins and subsequent translocations, no DPS is genetically, behaviorally, or ecologically unique.	<ul style="list-style-type: none"> <li>No other plains bison population is as important to survival of species,</li> <li>Only surviving natural occurrence of wild bison never completely extirpated from its range,</li> <li>Only major conservation herd in US that shows no evidence of cattle-gene introgression,</li> <li>Only remnant population to remain in wild state since prehistoric times.</li> <li>Ecologically unique geothermal features that bison have adapted to,</li> </ul>

J. Gober, 01-14-2015

			<ul style="list-style-type: none"> <li>• Extirpation of YNP bison would represent complete loss of genetically intact, wild bison,</li> <li>• YNP bison are 40% from wild bison and thus the only herd in the US that represents a surviving natural occurrence,</li> <li>• Differential migratory behavior seen in no other bison,</li> <li>• Therefore, significant (2 new citations)</li> </ul>
5 Factor Analysis	90-day finding concluded that none of the factors are threats	90-day finding concluded that none of the factors are threats	Petitioners assert that range curtailment, livestock grazing, development, invasive plant species, hunting outside of YNP boundaries, disease, inadequate regulatory mechanisms, genomic extinction, and climate change are threats.