



United States Department of the Interior



NATIONAL PARK SERVICE
INTERMOUNTAIN REGION
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IN REPLY REFER TO:

May 10, 2016

VIA ELECTRONIC MAIL – NO HARD COPY TO FOLLOW

Memorandum

To: Director, U.S. Fish & Wildlife Service

From: Intermountain Regional Director, National Park Service

Subject: NPS Comments on Proposed Rule: *Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife* and Final Draft 2016 Conservation Strategy, Docket ID: FWS-R6-ES-2016-0042

The National Park Service (NPS) appreciates the opportunity to provide comments on the Proposed Rule: *Removing the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife* and the associated draft Conservation Strategy. The attached review comments were prepared by staff from Yellowstone National Park (YELL), Grand Teton National Park (GRTE), John D. Rockefeller Jr. Memorial Parkway (JODR), and NPS Regional and Washington Offices. NPS reviewers noted that the U.S. Fish and Wildlife Service (USFWS) has done an excellent job of structuring the argument for delisting of the Greater Yellowstone Ecosystem (GYE) population of grizzly bears and that the state of the science is well presented.

Upon delisting of the GYE grizzly bear, the states of Wyoming, Montana, and Idaho along with the NPS, U.S. Forest Service (USFS), Bureau of Land Management (BLM) and tribes will collectively co-manage this species and habitat within the identified Demographic Monitoring Area (DMA). This will require careful coordination and collaboration to effectively manage bears which do not recognize jurisdictional boundaries. The NPS is committed to working closely and collaboratively with the USFWS and our other partners to develop and implement a cooperative management framework for this wide-ranging species while recognizing and respecting each partner's jurisdiction, mission, values and interests.

The NPS continues to focus on supporting the delisting process while trying to ensure values of the NPS are considered in management strategies and actions. Grizzly bears are a premier wildlife attraction for visitors to YELL, GRTE and JODR; and those visitors bring tens of millions of dollars into the regional economy. The bears contribute to the public's enjoyment and sense of pride in our conservation heritage. We seek to ensure that any future grizzly bear harvests within the GYE be conducted in a manner that: 1) respects the NPS mission; 2) protects regional economic benefits and the enjoyment of bear watching; 3) reduces the risks associated with wounded bears entering NPS units; and 4) limits the likelihood that well-known or transboundary bears will be harvested.

The attached NPS comments on the Proposed Rule and draft Conservation Strategy reflect many of the same key issues or themes that the NPS raised during the April 2016 Interagency Grizzly Bear Committee – Yellowstone Ecosystem Subcommittee (IGBC-YES) meeting in West Yellowstone and during the September 2015 interagency meeting in Idaho Falls. Those key issues include:

1. If, after delisting, the decision is made to hunt grizzly bears, NPS is requesting that states focus the majority of future grizzly bear harvests away from park boundaries. In addition, NPS is requesting that harvests be focused in areas where human-bear conflicts are prevalent.
2. NPS is requesting that NPS representatives be included in the discussions and contribute to the development of recommendations during the annual meetings referred to in the draft Memorandum of Agreement (MOA) among the three states, recognizing that the decisions made during these meetings ultimately inform the discretionary mortality allocation by the states.
3. NPS is requesting that the Proposed Rule, Conservation Strategy, state management plans and other related documents identify the John D. Rockefeller, Jr. Memorial Parkway (JODR) as one of the three national park units in the GYE where hunting will not be permitted.
4. NPS is requesting that if a new estimation model other than Chao2 is used in the future, the states will recalibrate the population thresholds (i.e., minimum and average numbers of bears) and proportions of allocated hunter harvest based on the estimates provided by the new model in comparison to Chao2.

We look forward to working with the USFWS and other members of IGBC-YES to ensure that these issues are addressed in the Proposed Rule, Conservation Strategy and/or state grizzly bear management plans, as appropriate. The NPS is committed to working collaboratively with our state, federal and tribal partners to develop and implement a cooperative framework for successful management of the GYE grizzly bear population upon delisting of this iconic species. Thank you again for the opportunity to provide comments.



to Sue E. Masica

cc:
Superintendent, Yellowstone National Park
Superintendent, Grand Teton National Park
Associate Director, Natural Resource Stewardship and Science
Associate Regional Director, Resource Stewardship and Science, Intermountain Region

Attachment