



Attention: YES Grizzly Bear

Submitted online via: comments-intermtn-bridger-teton@usda.gov

December 31, 2021

Dear Members of the YES Subcommittee;

On behalf of the National Parks Conservation Association (NPCA), I appreciate the opportunity to offer comments on the *Greater Yellowstone Ecosystem (GYE) Grizzly Bear Conservation Strategy (CS)*.

Since 1919, NPCA has been the leading voice of the American people in protecting and enhancing our National Park System, working with our more than 1.6 million members and supporters to preserve our nation's natural, historical, and cultural heritage for present and future generations. NPCA has a longstanding interest in protecting national parks and their resources, including wildlife, land, and water within national parks and on park adjacent landscapes.

We agree that the best available science should be utilized to ensure adequate protections for grizzly bears as required by the Endangered Species Act, including new geoprocessing tools and methodologies that more accurately compute habitat parameters via the footprint approach. However, with the release of the proposed changes to the habitat standards in the CS, we have concerns about the potential for long-term impacts to grizzly bears related to revising the secure habitat standards and adjusting current developed site standards. Specifically, those concerns include:

Secure Habitat Standards:

The revised secure habitat standards include additional emergency accommodations for primary or secondary roads, power lines, utilities systems, and/or associated infrastructure, and access to these sites is provided for in addition to "other administrative activities". It is unclear what "other administrative activities" are as defined by the activities allowed in secure habitat without violating the standard. It is necessary to identify specific activities that are allowed and under what circumstances.

Developed Site Standards:

Regarding the developed site standards within the Primary Conservation Area (PCA), the CS must define parameters for how the rules are applied. Rules for construction of new sites outside of the polygon/footprints of existing developed areas or road corridors are not clearly defined, the goal – "construction of new sites that do not meet the exceptions...[in the CS] will be mitigated for, within the same bear management subunit or as close as possible, by closure of another site of comparable human use to offset any increase in the number of developed sites or capacity for human use and restoring secure

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habitat of equivalent quality and quantity” – does not adequately define specifically the parameters for mitigation and removes the requirement to mitigate within the affected subunit. This goal should retain the language from the 2016 CS – “mitigated for within that subunit to offset any increase in the number of developed sites and/or capacity for human use, habitat loss, and increased access to surrounding habitats.”

As currently written, the application rules do not specify temporal parameters for new developments within or outside of the footprint of developed sites/primary road corridors, which is an important factor for providing secure habitat and reducing human-grizzly bear conflicts. Additionally, the CS clarifies the requirement for NEPA analysis for construction of new facilities within developed sites and road corridors, but not for construction of new sites that fall within the “exceptions” to the application rules – clarification is needed on this decision-making process.

Lastly, the application rules for developed and dispersed sites provides limited restrictions to new developments within the existing footprints of active sites. The rules as they are proposed could allow for a developed campground on national forest lands to be replaced by recreational cabins so long as overnight visitor use does not increase above a net 10% per footprint and mitigation steps were taken. There must be stricter parameters put into place around what specific mitigation is required, what sort of developments are allowed, and the frequency with which changes are allowed to take place within each BMU.

Road corridors

Increasing the number and/or capacity of day use sites, including picnic areas, pull offs, and rest stops, even by no more than 10%, will increase opportunities for conflict as bears and other wildlife move across road corridors. Again, the development of road corridors should be bounded not only spatially, but also temporally to adequately provide habitat protections for the species in the long-term.

Visitor use continues to reach record numbers every year and providing more space for visitors to congregate will increase the density of visitors in these areas. Has the subcommittee considered that visitors will still pull off the side of the road when day use sites are full and for more convenient/opportunistic wildlife viewing, and how the impacts of increased visitor density in an area may impact grizzly bears? Grizzly bears need to be able to move across road corridors without the potential for increased human conflicts.

New Development to Accommodate Increasing Visitation

We recognize the importance of managing adaptively and incorporating the best available science and technology into grizzly bear management. While we understand the desire to build new infrastructure to accommodate a rapidly increasing visitor population inside the park and in adjacent public lands, there needs to be a clear understanding about the impacts of increased visitation and visitor density on grizzly bears and maintaining secure habitat. Building additional infrastructure to meet the demands of increased visitor use does not allow for the long-term viability of a recovered grizzly bear population when higher visitor density equates to increased opportunities for human-grizzly bear conflict. The subcommittee needs to recognize that new development is only one tool in the toolbox of visitor management, and needs to identify other approaches as well, including but not limited to, timed parking at specific sites, mitigation of increasing recreation by closing other locations, limiting the number of visitors through reservations and/or other options. Simply building to address increasing visitation is no longer an option if the goal is to maintain a viable grizzly population into the future while also minimizing human-grizzly conflicts.

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We look forward to continuing to work with the YES Subcommittee to help maintain this iconic species on the landscape in our National Parks long into the future. We appreciate the opportunity to comment on this proposal and hope that the subcommittee will consider the points that we raised. Please feel free to contact Kelsie Huyser at khuyser@npca.org or 406-970-0738 with any questions or for additional information.

Sincerely,

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