



*Sent via email to: comments-intermtn-bridger-teton@usda.gov*

To: Yellowstone Ecosystem Subcommittee/Developed Sites Technical Team  
Re: Proposed Changes to Conservation Strategy Chapter 3 Habitat Standards and Monitoring, and Appendix E 1998 Baseline for Habitat Standards  
Date: December 21, 2021

Dear Members of the Yellowstone Ecosystem Subcommittee and Developed Sites Technical Team:

Thank you for the opportunity to comment on the *Proposed Changes to Conservation Strategy Chapter 3 Habitat Standards and Monitoring, and Appendix E 1998 Baseline for Habitat Standards*. We provide these comments on behalf of more than 8,100 Sierra Club members in the three-state Greater Yellowstone Area, and 832,000 nationwide. Sierra Club has worked for many years to further grizzly bear recovery, including protection of important grizzly bear habitat. Our members care deeply about grizzly bears and their full recovery, and also actively use our public lands in the region for recreation and other pursuits.

We appreciate the level of detail provided in the draft documents as rationale for the proposed changes to the habitat standards in regard to developed sites and the delineation of the proposed changes to the Conservation Strategy (CS). We also appreciate the work of the Developed Sites Technical Team and other agency staff for their efforts to update and accurately reflect the current situation on the ground in regard to the human footprint including human-associated developments and motorized routes. We recognize that this work is very time consuming and often not “sexy” but it is critical to having an accurate understanding of human impacts on grizzly bears and their habitat. Sierra Club supports use of the most accurate and consistent method for representing and tracking human development and any associated reduction in grizzly bear secure habitat.

#### Visitation/Secure Habitat

We understand that federal agencies are facing large challenges in regard to management of visitation by the general public to the national parks and national forests – the fundamental reason for proposing these changes to the habitat standards in regard to developed sites. As noted in the proposed revised Appendix E:

“[S]ince 2007, when habitat standards were first implemented, the number of visitors on public lands throughout the GYE has increased significantly. In Yellowstone National Park alone, annual visitation increased by more than 40% during the period 2008–2018,

surpassing 4 million visitors per year since 2016 (National Park Service website)” (Appendix E, pg. 3)

and:

“[... t]he habitat standards associated with the 1998 baseline and the administrative mandates to manage for increased visitation have not kept pace with the recent changes in a manner that allows land managers to responsibly accommodate the current, and likely future, increase in visitor use.” (Draft CS Chapter 3 p. 2)

We recognize that national forests are experiencing a large increase in visitation as well in part due to spillover from the national parks, resulting in a host of associated management issues, and that the COVID-19 epidemic has exacerbated management challenges.

With exploding visitation to the national parks and forests, as an overarching comment we believe that it is critical for land management agencies to undertake a comprehensive up-to-date analysis of overall trends in visitor use and the growth in use in the region – where it is occurring, by how much, etc. Such an analysis should also include identifying what administrative infrastructure would be needed; as noted in the draft documents, “...[t]he steady increase in visitor numbers may necessitate more administrative infrastructure to strategically manage the impacts of more people on the landscape.” (Draft CS Chapter 3 p.2) This up-front analysis is particularly important when visitor use can and does have a profound impact on species including grizzly bears needing large tracts of secure, undisturbed habitat.

We also believe that there is a point at which increased visitation begins to irrevocably impact wildlife, and that in such cases limitations on visitor use can and should be implemented to protect wildlife. A study such as the one proposed above can help to determine what such limitations might be, and where they might be implemented. There is public support for restrictions or human use limits when grizzly bears are impacted, as demonstrated by a recent study in Banff National Park.<sup>1</sup> A large part of Sierra Club’s mission is to get people outdoors to experience their public lands and to increase equitable access to the outdoors. However, we recognize that sometimes limits on human visitation/recreational use are warranted in some places to protect wildlife. As noted in the draft documents:

“[A]dherence to the habitat standards and its associated sideboards to human activities has contributed to the successful recovery of the GYE grizzly bear population.” (Draft CS Chapter 3 p. 2)

and:

“[R]estrictions in human activities due to management practices implemented by the IGBC in the mid-1980s correlate strongly with the steady increase in the GYE grizzly bear population observed between 1983 and 2001. Habitat standards formalized in this document impose measurable sideboards on levels of road development, construction of

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<sup>1</sup> <https://www.rmotoday.com/banff/banff-visitors-support-human-use-restrictions-to-protect-grizzly-bears-4765813>

developed sites, and livestock allotments allowed on Federal lands inside the PCA, thereby reducing opportunities for grizzly bear-human conflicts, habitat disturbance, and displacement of grizzly bears from valuable habitat.” (Draft CS Chapter 3 p.8)

In the absence of a comprehensive analysis of current trends in visitor use and projected future use and growth, and subsequent consideration of visitation restrictions or limits, we are concerned that opening the Conservation Strategy to revision in regard to developed sites is a slippery slope. Clearly, visitation to the national parks and forests of the Greater Yellowstone region will continue to rise in future years. Will we be facing this situation again just a few years down the road, and proposing additional changes to accommodate more visitor demand and further loosening of habitat standards in regard to developed sites?

We recognize that the hard work of the Technical Team and other agency staff to more accurately capture the current true human footprint on the landscape, for this proposed round of revision, has documented a relatively small 0.2 percent decrease in what is deemed as grizzly bear secure habitat and that the stated intent of the partner agencies is overall to adhere closely to the 1998 baseline. However, we are very concerned that chipping away at secure habitat and increasing allowable visitor overnight use in order to continually accommodate increased visitation could ultimately result in measurable, significant loss of habitat for grizzly bears and more conflicts between people and bears.

#### Increased Overnight Capacity

Proposed revisions to the CS include a 10% increase in overnight visitor use capacity:

“[O]vernight visitor use does not increase above approved levels that existed in 1998, except that a) a net increase of 10% per footprint in the capacity of visitor overnight use may occur at lodges, guest ranches, and organizational camps that operate under special-use permits on national forest lands, and in national park lodges that are below the capacity of previously approved capacity (“pillow count”) as outlined in park Master Plans (for example, Master Plan, Yellowstone National Park/Wyoming-Montana-Idaho (National Park Service 1974); (CS Chapter 3 p. 15)

We are unclear from the above statement how one can increase overnight capacity by 10% but still not be above the levels that existed in 1998. We are also unclear from the documents provided how the allowable increase of 10% in overnight visitor use capacity was determined, vs. 5%, 15% etc. and we request clarification on this point. We are also unclear from the documents provided on how much the national park lodges have to be under their “previously-approved capacity” in order to increase their overnight capacity by as much as 10%.

We are concerned about increased overnight capacity in part because it potentially means more conflicts between people and bears, with a larger number of people in and around developed sites overnight. As noted in the documents:

“[D]eveloped sites are often associated with human activities that may disrupt grizzly bear use of habitat or have attractants that potentially lead to increased human-bear conflicts.” (CS Chapter 3 p.13)

Additionally, we are concerned about an unlimited increase (within the footprint) in the number of sites in developed campgrounds on lands administered by the Forest Service. We recognize that campgrounds are an already disturbed area and therefore not secure habitat, but additional campsites means more “people management” demands on the Forest Service. With the agency already facing severe monitoring and enforcement challenges of adherence to food storage orders in campgrounds, how is the Forest Service planning to manage additional sites and people with the same limited resources? At a minimum, we believe that a monitoring and enforcement plan with additional staffing resources devoted to ensuring people follow food storage orders and “best management practices” must accompany any proposed increase in overnight capacity at frontcountry campgrounds.

As a related issue, in the current CS there is language about eliminating dispersed camping sites in order to be able to add sites at frontcountry campgrounds. In the proposed revisions to Chapter 3, that language is deleted as a result of moving to the “footprint” approach. However, the issues surrounding dispersed campsites remain in regard to people management, food storage order enforcement and potential conflicts between campers and bears. If the habitat standards on developed sites are revised in order to allow unlimited new sites at established campgrounds, will the Forest Service consider elimination of dispersed sites or how does the agency plan to monitor and enforce food storage orders and “best management practices” with an increased number of sites in developed campgrounds as well as the same number of dispersed sites?

#### Administrative/Maintenance Infrastructure

We are concerned that the proposed changes would allow new construction of administrative or maintenance infrastructure outside of prescribed footprints without mitigation:

“[N]ew emergency administrative/maintenance infrastructure is allowed outside of prescribed footprints without mitigation if such construction is necessary to reduce resource damage or potential for human-grizzly bear conflicts or increase visitor safety. Examples of new allowed infrastructure could include replacement or new construction of critically needed water, sewage or electric utilities or the replacement of administrative or visitor infrastructure damaged by natural hazard.” (Draft CS Chapter 3 p. 16)

The above language is very open-ended and we believe could open the door to significant development outside of prescribed footprints without mitigation, particularly in the case of new construction of water/sewage/electric infrastructure. As one example, “increas[ing] visitor safety” could encompass many projects. Would infrastructure such as new sewer, water, or electric facilities fall within the definition of increasing visitor safety? How would such projects be analyzed? Would a NEPA process be undertaken?<sup>2</sup> As noted above, the draft documents state

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<sup>2</sup> We recognize that the proposed revisions state that NEPA will be undertaken for new construction in developed sites/road corridors, but the document is silent on whether a NEPA process will be undertaken outside of a developed site prescribed footprint for ‘emergency administrative/maintenance infrastructure’ construction.

that “the steady increase in visitor numbers may necessitate more administrative infrastructure to strategically manage the impacts of more people on the landscape.” (Draft CS Chapter 3 p.2) How are “critically needed” and “emergency” defined, and would a “steady increase in visitor numbers” constitute a situation in which new infrastructure could be developed without mitigation outside of a developed site footprint, if it was deemed as critically needed? Any infrastructure developed outside of prescribed footprints should require mitigation in the same bear management subunit.

Thank you for your consideration of our comments. We urge the Developed Sites Technical Team and the Yellowstone Ecosystem Subcommittee to seriously consider the points we have raised above, to provide clarification where requested, and to incorporate recommended changes to the proposal.

Sincerely,

A handwritten signature in blue ink that reads "Bonnie Rice". The signature is written in a cursive, flowing style.

Bonnie Rice  
Senior Representative, Greater Yellowstone-Northern Rockies Regions