From: Gunther, Kerry
To: Fortin-Noreus, Jennifer
Subject: Habitat Standards
Date: Thursday, August 11, 2016 11:11:05 AM
Attachments: Developed Site Standard new language.docx

Jennifer,

The stated objective of the habitat standards are to 1) reduce displacement of bears, and 2) reduce human-caused mortality. We believe that YNP has already adequately addressed both of these issues, but that we are not being given credit for our success in those areas. In 1982 we implemented a Bear Management Area program whereby we restrict or close public use of seasonally important grizzly bear habitat in the park. No other agency in the GYE has done anything like that. In addition, we manage visitor use in a manner where we have almost no human-caused mortality, except for the occasional road-kill.

You are asking us to put significant constraints on how we manage the park, yet those constraints would likely do very little to meet the stated objectives to reduce mortality and displacement. Even if we agree to these constraints, at most we would be saving a mere fraction of a bear per year. At the same time the states will be killing, through hunting, many more bears each year than we could possibly save by implementing these habitat standards in the park. So why should we agree to hand-cuff our management options, for no net-gain in bears? We all agree that the population has increased enough that it can withstand some discretionary mortality. Therefore, saving fractions of bears only to kill many bears through discretionary mortality seems a bit contradictory.

If the objective of the Habitat Standards is truly to reduce mortality in the PCA, then they should address the most prevalent sources of mortality. By a wide margin, the highest sources of mortality are bear-human conflicts on private land, self defense kills by ungulate hunters, and management removals of bears involved in livestock depredations. Only livestock depredations are addressed in the Habitat Standards, so the Conservation Strategy completely ignores the two highest sources of mortality.

With visitation to YNP increasing significantly every year, are these very restrictive standards, that will have very little measurable benefit, really the best way to address mortality or displacement? With our trends in visitation, we can't continue to patch our outdated infrastructure. We need to look at innovative ways to address visitor use while still protecting bears. These proposed Habitat Standards inhibit our ability to address our management challenges.

The attached language that I proposed would allow us the flexibility to manage increasing visitation, while still protecting bears and bear habitat. I don't believe YNP's proposed language leave us any more vulnerable to a lawsuit than the Population Standards proposed in the Conservation Strategy. The Population Standards leave the states a lot of flexibility in managing the population. We are simply requesting that same flexibility with habitat management.

The language I propose would still require that projects undergo NEPA and would require mitigation if determined to have negative consequences for bears.

Kerry

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