

**From:** Fortin-Noreus, Jennifer  
**To:** [Gunther, Kerry](#)  
**Subject:** RE: Habitat Standards  
**Date:** Monday, August 15, 2016 12:01:44 PM  
**Attachments:** [Chapter 3 proposed revisions\\_YNP.docx](#)

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Kerry,  
Please let me know your thoughts on the attached proposed wording. I will be working from home the majority of this week so please feel free to call me on my cell (208-301-1336) if you want to discuss it.  
Jennifer

*Jennifer Fortin-Noreus, Ph.D.  
Postdoctoral Researcher  
Grizzly Bear Recovery Program  
University of Montana  
University Hall, Room 309  
Missoula, MT 59812  
phone: (406) 243-4994  
[jennifer.fortin-noreus@umontana.edu](mailto:jennifer.fortin-noreus@umontana.edu)*

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**From:** Gunther, Kerry [[kerry\\_gunther@nps.gov](mailto:kerry_gunther@nps.gov)]  
**Sent:** Monday, August 15, 2016 8:49 AM  
**To:** Fortin-Noreus, Jennifer  
**Subject:** Re: Habitat Standards

Jennifer,

During the 13 year period from 2002 through 2014, we had 7 vehicle strike mortality's and 7 management removals for a total of 14 human-caused mortality's. The Management removals include 2 subadult females (from developed areas), 2 subadult males (from developed areas), and an adult female with 2 cubs (that killed and consumed someone in a backcountry area).

So, 4 bears in 13 years from park developments (average = 0.31 per year)

Kerry

On Mon, Aug 15, 2016 at 8:13 AM, Fortin-Noreus, Jennifer <[jennifer.fortin-noreus@mso.umt.edu](mailto:jennifer.fortin-noreus@mso.umt.edu)> wrote:

Kerry,

Unfortunately I am working part time this week from home as my son is having a tonsillectomy today so don't have time to go through the annual reports to document the number of human-caused mortalities inside YNP. Would you please provide me with the number of human-caused grizzly bear mortalities inside YNP from 2002-2014? I'm trying to finish up proposed wording this morning to provide for your edits and then discussion with Dan Wank.

Thank you!

Jennifer

Jennifer Fortin-Noreus, Ph.D.  
Postdoctoral Researcher  
Grizzly Bear Recovery Program  
University of Montana  
University Hall, Room 309  
Missoula, MT 59812  
phone: (406) 243-4994  
[jennifer.fortin-noreus@umontana.edu](mailto:jennifer.fortin-noreus@umontana.edu)

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From: Gunther, Kerry [[kerry\\_gunther@nps.gov](mailto:kerry_gunther@nps.gov)]  
Sent: Monday, August 15, 2016 7:27 AM  
To: Fortin-Noreus, Jennifer  
Subject: Re: Habitat Standards

Jennifer,

That is correct, the potential youth camp and parking lots would need access roads (although very short), so we would impact secure habitat and road density. The IGBST Annual reports document mortality and show almost no human-caused mortality in YNP.

Kerry

On Fri, Aug 12, 2016 at 9:39 AM, Fortin-Noreus, Jennifer <[jennifer.fortin-noreus@mso.umt.edu](mailto:jennifer.fortin-noreus@mso.umt.edu)><<mailto:jennifer.fortin-noreus@mso.umt.edu>>> wrote:  
Kerry,

I am working on some wording to justify proposed changes to the developed site standard within YNP. Do you have some references you can provide for the low mortality that occurs inside YNP? Additionally, given our conversations it seems that modifications to just the developed site standard are not enough but that the park needs exceptions for secure habitat and road density. Is that correct?

Thank you,

Jennifer

Jennifer Fortin-Noreus, Ph.D.  
Postdoctoral Researcher  
Grizzly Bear Recovery Program  
University of Montana  
University Hall, Room 309  
Missoula, MT 59812  
phone: (406) 243-4994  
[jennifer.fortin-noreus@umontana.edu](mailto:jennifer.fortin-noreus@umontana.edu)<<mailto:jennifer.fortin-noreus@umontana.edu>>

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From: Gunther, Kerry [[kerry\\_gunther@nps.gov](mailto:kerry_gunther@nps.gov)<[mailto:kerry\\_gunther@nps.gov](mailto:kerry_gunther@nps.gov)>]  
Sent: Thursday, August 11, 2016 11:10 AM  
To: Fortin-Noreus, Jennifer

Subject: Habitat Standards

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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Kerry Gunther

Bear Management Office  
P.O. Box 168  
Yellowstone National Park, WY 82190

Phone: 307-344-2162  
Fax: 307-344-2211

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Kerry Gunther  
Bear Management Office  
P.O. Box 168  
Yellowstone National Park, WY 82190

Phone: 307-344-2162  
Fax: 307-344-2211

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Bear Management Office  
P.O. Box 168  
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