

**Attachment 1**  
**NPS Comments on the 2016 Draft Wyoming Grizzly Bear Management Plan (WGBMP)**  
**4/20/2016**

- 1. *NPS requests that states focus the majority of future grizzly bear harvests away from park boundaries. In addition, NPS requests that harvests be focused in areas where human-bear conflicts are prevalent.***

A high proportion of grizzly bears use both national park lands and other lands in the GYE. For example, using Interagency Grizzly Bear Study Team (IGBST) telemetry data from 456 collared bears from 2000-2012 in the Demographic Monitoring Area (DMA), the NPS determined that 46.8% of collared bears used NPS-managed lands, of which almost half (46.2%) were “transboundary bears” using both NPS lands and lands outside of national park units.

As acknowledged on Page iv of the WGBMP, public support “*is the key to the long-term welfare and sustainability of the grizzly bear population.*” The manner in which grizzly bears will be managed in areas adjacent to national park units will play an important role in this social acceptance and tolerance. The NPS recognizes and appreciates that the WGBMP identifies a number of management actions that would support the overall objective of focusing harvests away from park boundaries, and acknowledges the state would “*apply more conservative management policies within portions of the [Primary Conservation Area] PCA outside of national parks to assure demographic distribution criteria*” (page 10). However, we request the plan affirmatively state that Wyoming supports an approach of focusing bear harvests away from park boundaries and would work to integrate such an approach in future management actions. The NPS believes that such a position would go a long way toward maintaining public support.

The WGBMP indicates that where human-bear conflicts are high, bears would be managed proactively to prevent damage and address human safety concerns. The plan also states that “*...public take [hunting] may also be directed, when appropriate, to areas with high frequencies of human-grizzly bear conflicts*” (page 14). The NPS requests that the WGBMP more affirmatively state that human-bear conflict areas would be used as a primary consideration in identifying hunting areas and establishing hunting objectives.

- 2. *NPS requests that NPS representatives be included in the discussions and contribute to the development of recommendations during the annual meetings referred to in the draft WGBMP and MOA, recognizing that the decisions made during these meetings ultimately inform the discretionary mortality allocation by the states.***

The three park units comprise over a third (39%) of the PCA and provide important and secure habitat for this population. While we recognize that decisions regarding the allocation of harvest mortality outside NPS lands lie solely within state or tribal jurisdictions, we believe it is important that the WGBMP and the MOA acknowledge the NPS as an important partner agency that should be consulted and included in discussions regarding the distribution of harvest mortality so NPS concerns can be considered in future decisions to be made by the states. To acknowledge NPS’ role as a partner agency,

we also request Page vi of the WGBMP be revised to clarify that, after the grizzly bear is removed from its listed status, state wildlife agencies, tribes, *and the National Park Service* will assume management authority and lead roles for managing the species.

**3. *NPS has stated that hunting will not be permitted in the John D. Rockefeller, Jr. Memorial Parkway.***

The JODR is a unit of the National Park System where hunting of grizzly bears will not be allowed. We request that the WGBMP identify JODR along with YELL and GRTE whenever national park units are mentioned, such as on page vi and page 2.

**4. *NPS requests 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.***

The WGBMP is silent as to whether a new population estimating model is used in the future, a “recalibration” would occur between different models. The NPS believes it is important that the plan acknowledge the need to recalibrate population estimates and mortality thresholds should a new estimation model be used in the future. We believe this would need to occur before any new model would be approved by the IGBC and YGCC. Stating this in the plan will help reassure the public and stakeholders that this would be done to accurately base management of populations and mortality thresholds.

**5. *NPS requests that annual harvest allocations be based on the number of grizzly bears available to be hunted outside park units rather than the entire population, thereby excluding bears in GRTE, the JODR and YELL where hunting will not be allowed.***

We request that this approach be acknowledged in the WGBMP, and look forward to discussing this with you and our other partners as we continue to work on the Conservation Strategy.