



United States Department of the Interior

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INTERMOUNTAIN REGION
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IN REPLY REFER TO:
IMR-RSS

APR 21 2016

Scott Talbott, Director
Wyoming Game and Fish Department
5400 Bishop Boulevard
Cheyenne, Wyoming 82006
[scott.talbott@wyo.gov]

Dear Mr. Talbott:

Thank you for the opportunity to provide comments on the Draft Wyoming Grizzly Bear Management Plan (WGBMP). Staff from Yellowstone National Park (YELL), Grand Teton National Park (GRTE), John D. Rockefeller Jr. Memorial Parkway (JODR), and the National Park Service (NPS) Regional and Washington Offices reviewed the draft document and found it to be well written and conceived. The NPS supports the many protective measures proposed in the plan and recognize that these reflect the strong commitment Wyoming has to protect, conserve, and manage grizzly bears within the Greater Yellowstone Ecosystem (GYE) upon delisting of this population. Among others, the NPS supports the following regulatory mechanisms proposed in the WGBMP:

- Hunting seasons, mortality limits, and grizzly bear hunting regulations will be approved by the Wyoming Game and Fish Commission (WGFC) through a public process.
- No person shall take any grizzly bear with dependent young at side, nor shall they take dependent young.
- Any person taking a grizzly bear will report the harvest to the Wyoming Game Fish Department (WGFD) office, game warden or biologist within 24 hours.
- Hunting license allocations will be based on a limited draw/mortality limit system within the Demographic Monitoring Area (DMA).
- Hunting seasons will close if female mortality limits are reached or exceeded.
- If adult female, adult male, or dependent young mortality limits are exceeded, the following year's discretionary mortality allocation will be adjusted accordingly.
- All hunters licensed to take grizzly bears must complete an informational grizzly bear ecology and management course focused on harvest regulations, safety, proper identification, and ethics related to hunting grizzly bears.
- All grizzly bear hunters must carry bear spray while engaged in the act of grizzly bear hunting.
- In order to annually evaluate the grizzly bear population, the WGFD will look at multiple recovery factors (population size, distribution, annual mortality) to evaluate the overall status of the population.

The NPS and the State of Wyoming along with many other partners have contributed a significant amount of resources and effort toward recovery of the GYE grizzly bear population since it was listed as threatened by the U.S. Fish and Wildlife Service (FWS) in 1975. The NPS recognizes the valuable conservation efforts the State of Wyoming has undertaken for many years and its contribution to the recovery of the GYE grizzly bear. Wyoming's significant monitoring and management efforts to address human-bear conflicts, in addition to extensive public education and outreach such as the "bear wise" program, are especially noteworthy. The NPS also recognizes Wyoming's cumulative investments towards GYE grizzly bear recovery which currently exceeds \$2 million annually.

In accordance with the GYE grizzly bear draft Conservation Strategy, upon the delisting of the GYE grizzly bear, the states of Wyoming, Montana, and Idaho, along with the NPS, U.S. Forest Service (USFS), Bureau of Land Management (BLM) and tribes will collectively co-manage this species and habitat within the identified DMA. This will require careful coordination and collaboration to effectively manage bears which do not recognize jurisdictional boundaries. The NPS is committed to working closely and collaboratively with Wyoming and our other partners to develop and implement a cooperative management framework for this wide-ranging species while recognizing and respecting each partner's jurisdiction, mission, values, and interests.

The NPS continues to focus on supporting the delisting process while trying to ensure values of the NPS are considered in management strategies and actions. Grizzly bears are a premier wildlife attraction for visitors to YELL, GRTE and JODR, who bring tens of millions of dollars into the regional economy. The bears contribute to the public's enjoyment and sense of pride in our conservation heritage. More specifically, we seek to ensure that any future grizzly bear harvests within the GYE be conducted in a manner that (1) respects the NPS mission; (2) protects regional economic benefits and the enjoyment of bear watching; (3) reduces the risks associated with wounded bears entering NPS units, and (4) limits the likelihood that well-known or transboundary bears will be harvested.

Attached are NPS comments on the WGBMP which reflect the same key issues or themes that the NPS raised during the April 2016 Yellowstone Ecosystem Subcommittee (YES) meeting in West Yellowstone and at the September 2015 interagency meeting in Idaho Falls. We look forward to working with WGFD and other members of the YES to address these issues in the context of both the WGBMP and the Conservation Strategy that we will be working together on over the next few months. The NPS is committed to working collaboratively with Wyoming and our other state, federal and tribal partners to develop and implement a cooperative framework for successful management of the GYE grizzly bear population upon delisting of this iconic species. Thank you again for the opportunity to provide comments on the draft WGBMP.



for Sue E. Masica

Attachment

cc:

Chief, Wildlife Division, Wyoming Game and Fish Department [brian.nesvik@wyo.gov]

Superintendent, Yellowstone National Park

Superintendent, Grand Teton National Park

Associate Director, Natural Resource Stewardship and Science

Associate Regional Director, Resource Stewardship and Science, Intermountain Region