

NPS REVIEW COMMENTS
PROPOSED RULE: REMOVING THE GREATER YELLOWSTONE ECOSYSTEM POPULATION OF GRIZZLY BEARS
FROM THE FEDERAL LIST OF ENDANGERED AND THREATENED WILDLIFE
FWS DOCKET ID: FWS-R6-ES-2016-0042
MAY 10, 2016

| # | Page | Col/Para/Line | Comment |
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| 1 | 13181 | Col 1, Para 1, Last Sentence | We suggest adding <u>“The importance of secure habitat here also includes the concept of focusing a majority of discretionary mortality (hunting) outside the PCA as well as away from NPS boundaries.”</u> |
| 2 | 13184 | Figure 2 | Please add GRTE and JODR to map. |
| 3 | 13196 | Col 2, Para 2 | Update visitation in National Parks. In 2015 over 4 million people visited and recreated in Yellowstone NP, and over 3.1 million people visited and recreated in Grand Teton NP. Both parks are expected to experience continued increases in visitation in the future. |
| 4 | 13202 | Col 1, first line, | We suggest inserting <u>“Service unit”</u> so as to say ...National Park <u>“Service unit”</u> boundaries... |
| 5 | 13201 | Col 3, Last Para, Sentence 1 | Suggest replacing “Parks” with <u>“Parklands”</u> |
| 6 | 13202-03 | Tables 2 and 3 | To ease confusion of different thresholds, be more clear and add column that no discretionary mortality would be allowed with a <600 pop estimate. |
| 7 | 13202 | Table 2, management framework line item 5 | We suggest inserting the following language: <u>“NPS representatives will be included in the discussions and contribute to the development of recommendations during the annual meetings referred to in the Memorandum of Agreement (MOA) among the three states, recognizing that the decisions made during these meetings ultimately inform the discretionary mortality allocation by the states.”</u> |
| 8 | 13203 | Col 1, bullet list | We suggest adding the following: <u>“The majority of discretionary grizzly bear mortality (hunting) will occur in areas away from park boundaries.”</u> In addition, we suggest adding: <u>“Grizzly bear harvests will be focused in areas where human-bear conflicts are prevalent.”</u> |
| 9 | 13207 | Col 2, Para 1 | We request to insert language that <u>“conflict areas”</u> could be used as focal areas for hunting |

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| | | | as a tool. |
| 10 | 13210 | Col 1, Para 3 last sentence | We request that the proposed rule identify the John D. Rockefeller, Jr. Memorial Parkway (JODR) as one of the three national park units in the GYE where hunting will not be permitted. |
| 11 | 13210 | Col 2, Para 2 | As currently written the paragraph states that state management plans apply outside the PCA – we request clarification here. We believe state plans would apply throughout the DPS, excluding areas managed by NPS or tribes. |
| 12 | 13189 | Col 3 Para 1 | Allows unlimited hunting outside the DMA, but does not evaluate how this may affect potential connectivity with other ecosystems. We request this analysis be done. |
| 13 | 13188 | Table 1 | Does not evaluate how the sliding scale of discretionary mortality (from hunting) will impact the potential for connectivity of the GYE with populations in the Northern Continental Divide Ecosystem. We request that a detailed analysis be included of how the sliding scale of mortality will impact population numbers, dispersal, and connectivity. |
| 14 | 13201 | Col 3, Last Para | The FWS does not expect the three states to implement recreational trapping, however the proposed delisting rule does not clearly state there will be no trapping. We request the proposed rule state whether or not trapping of grizzly bears will be allowed within the DMA. |
| 15 | 13187 and 13188 | Col 3 and Table 1 | In demographic recovery criterion 1, the proposed delisting rule specifies a minimum population size of 500 individuals within the DMA for genetic health. In demographic recovery criterion 3, it then goes on to identify a population objective based on the 2002-2014 Chao 2 modeled average of 674 (95% CI = 600 – 757). Then in table 1, the proposed delisting rule goes on to state “ <i>if population size is estimated as fewer than or equal to 600 in any year, no discretionary mortality will occur unless necessary for human safety.</i> ” These different population thresholds are confusing and could be interpreted differently by individuals. We therefore suggest the proposed rule specify the minimum size above which the population will be managed and also clearly explain what metric will be used to determine whether or not this minimum population objective is met on an ongoing basis. |
| 16 | 13187 | Col 3, Last Para | We request 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) |

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| | | | and proportions of allocated hunter harvest based on the estimates provided by the new model in comparison to Chao2. |