

10 November, 2016

John Jarvis
Director of the National Park Service

**RE: Comments on Directors' Order #100 – Resource Stewardship
for the 21st Century**

Dear Mr. Jarvis-

It is a pleasure to provide support for the substance of the Directors' Order #100 – Resource Stewardship for the 21st Century. In this time of rapid change, it is imperative that all agencies managing the heritage of our country update their management approaches as this Order has done. It demonstrates a deep understanding of the challenges and the opportunities the National Park Service faces today and into the future.

As a wildlife corridor ecologist and the President of one of the first large landscape conservation efforts in the world, the Yellowstone to Yukon Conservation Initiative (Y2Y), I offer comments to specific components of the Order as follows:

1. Reaffirmation of the stewardship goals and in particular, ““when proposed park uses and the protection of park resources and values come into conflict, the protection of resources and values must be predominant.”
 - a. We must be managing many generations out, and parks are in many ways one of the only places where we allow nature to function relatively unimpeded. They are a natural laboratory and a resource that should exist not only for today’s citizens but for future generations.
2. Integrating Traditional Ecological Knowledge and increasing relationship and engagement with indigenous communities will enrich the ability of NPS to manage resources, including both natural and cultural resources, and will undoubtedly result in a longer-term enrichment of visitor experiences as indigenous concepts are better incorporated throughout NPS
3. Managing Resources Emphasizing Resilience, Connectivity at Land/seascape Scales, and Life-cycle Stewardship
 - This is an enormously important recommendation. If we are to conserve our natural and cultural heritage during this time of great change, it is imperative that the NPS is prioritizing resilience, connectivity at land- and seascape scales and maintaining life-cycle stewardship. Increasingly, research confirms and reaffirms that these concepts are mandatory in the 21st Century (e.g., Hilty et al. 2012.)
 - Furthermore the experience across Y2Y demonstrates that developing and implementing collaborative large landscape visions is powerful and yields results. For example, priority areas across Y2Y received increased protections – overall protected areas increased from 11 to 21 percent in a twenty year period-- and many other measures suggest that public-



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private collaboration across the region has enhanced the long-term conservation of natural resources (<https://y2y.net/publications/20th-anniversary-report> and Hilty et al. in prep).

4. Incorporating the Precautionary Principle and Adaptive Management into Resource Stewardship
 - a. If we are to successfully conserve our country's natural and cultural heritage in parks and elsewhere, exercising the precautionary principle is essential.
 - b. While this recommendation is critical, it would be strengthened if it explicitly incorporated the concept of cumulative impacts both within the park and those cumulative impacts beyond the park that can have adverse impacts to park resources over the long term.
5. Basing Resource Stewardship Decisions on Science, Law, and Long-term Public Interest
 - a. It is critical that the management of the NPS and resources that it stewards incorporate the best available science. We applaud the reinforcement of this concept in the Order
6. Ensuring Scientific Literacy for Superintendents
 - a. In order to incorporate and utilize best available science, leaders must be deeply conversant in science, and this recommendation is excellent at upholding this principle.

Overall, this Order is essential for ensuring that the NPS is best able to manage given a changing world. I applaud this Order.

Sincerely,



Jodi Hilty, Ph.D.
President and Chief Scientist