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Wyoming Game and Fish Department
Draft 2016 Grizzly Bear Management Plan
5400 Bishop Blvd.
Cheyenne, WY 82006

Dear Review Committee Members:

The Wyoming Wildlife Federation offers the following comments on the 2016 Draft Grizzly Bear Management Plan. The Wyoming Wildlife Federation (WWF), established in 1937 and with current standing membership of approximately 5,000, is Wyoming's oldest and largest statewide conservation organization. Our mission is to work for hunters, anglers and other wildlife enthusiasts to protect and enhance habitat; to perpetuate quality hunting and fishing; to protect citizen's right to use public lands and waters; and to promote ethical hunting and fishing.

Several numbers related to population recovery and management are presented in the draft plan. Additional discussion of them could alleviate confusion about them.

Demographic Criterion 1

The population objective of 500 bears and maintenance of 48 females with cubs of the year (COY) within in the Demographic Monitoring Area (DMA) are at odds. Forty-eight females with cubs equates to approximately 600 bears, substantially higher than the 500 objective. The objective of 500 grizzly bears was initially established based on genetic viability research in the early 2000s. This research indicated that at least 400 bears were needed to maintain genetic viability for this population. Agencies then buffered that estimate and established a population objective of 500. This was the only data available that agencies could use to establish an objective as Chao2 methodology was in its infancy.

There is some concern about the Yellowstone Grizzly Distinct Population Segment (DPS) being an isolated population with a perceived risk of genetic depression. For clarity, and to help alleviate that concern, some additional discussion of modelling and about other information regarding what is known on this topic would be helpful. Considerable research and deliberations have been invested in ensuring future management avoids genetic concerns, and there should be more discussion to put this topic in perspective. The 48 females with COY is mentioned briefly, but more emphasis on the significance of this, as well as the potential ability to use an occasional male from another recovery area to 'freshen' the genetics of the Yellowstone population should - help alleviate these concerns.

Both the Draft Federal Rule and this plan establish population objectives within the DMA of 600 or more bears, which is consistent with the 48 females with cub objective. To avoid confusion, we recommend eliminating discussion of the 500 objective. Or, discuss it to note its historical context, then clarify the greater importance or relevance of the more current criteria.

Demographic Recovery Criterion 3

Page 5, Figure 5 - Several boundaries are discussed in the plan, however, the DMA is where the majority of data collection, analysis and management decisions will occur. Figure 5 displays the distribution of radio-marked females in association the Primary Conservation Area (PCA). By using the PCA as a point of reference, it gives the impression that bears have expanded well outside the desired management area. It would help reduce confusion and concern if the DMA boundary was included in that.

Page 9, Large Carnivore Section – After sentence 2, we recommend adding, “It also collaborates and coordinates with other state and federal grizzly bear scientists and managers on research and monitoring in within the GYA

Page 11, Population Monitoring – No mention is made of the commitment of agencies associated with the Yellowstone DPS to maintain a constant minimum of 25 females with radio collars as one aspect of maintaining the effectiveness of monitoring. We recommend adding that to further illustrate the state’s (and YES’) commitment to continuing to collect the best information possible.

Page 23, Outdoor Recreation-Grizzly Bear Conflict Management – We recommend the second bullet be revised to read, “The Department will continue to encourage the carrying of bear pepper spray...” The addition of ‘continue to’ this emphasizes the agency’s ongoing commitment to work toward reducing conflicts.

Some stakeholders are opposed to hunting grizzly bears and appear to have an unrealistic perspective about the need to eventually regulate the population and address growing conflict situations. This, like the genetic concern, is likely to be a very contentious issue that could affect implementation of this plan. Some discussion about the realities and practicalities of dealing with an expanding population would be useful. It is unrealistic to expect that bears need to be removed from this population because of conflicts, or because the population is expanding into areas that are unsuitable, could be used to reestablish the species in many other locations in Wyoming within the grizzly’s historic distribution. The current Greater Yellowstone Area DPS boundary is the outer limits of the area which is practical to expect grizzly bears to occupy within the state given the human occupancy, uses and demands elsewhere. More discussion (justification) for the inevitability of harvest is warranted, especially related to those bears that currently reside outside the DMA.

We also urge the Department not to lead the public to believe that hunting will reduce or alleviate the number of grizzly bear conflicts in Wyoming. There is no data to support a correlation between increased legal harvest resulting in reduced conflicts.

The Interagency Grizzly Bear Committee Study Team (IGBCST) has been a vital entity in the investigations of and in recovery and management planning for the Yellowstone grizzly bear population. It has promoted efficiency, close coordination and the collective expertise that have made recovery of this population a success. Wyoming should clearly state the intent and commitment to remain an active member of IGBST. That intent is mentioned briefly in passing in the section on Research and Monitoring on page 15, but a more clear statement to that effect would help demonstrate the state's commitment to using the best available science and most effective collaboration to manage this population. To assure that the grizzly bear, once delisted, is managed by Wyoming Game and Fish, will require sound management using the best available science and continued collaboration with the IGBCST.

With all of the research and management needs associated with maintaining the long term viability of grizzly bears in the Greater Yellowstone Ecosystem, we question the Department's continued emphasis on research of potential impacts to big game species from grizzly bears. This appears to be an unnecessarily narrow focus on a topic that has had an inordinate amount of research dedicated to it.

We question the timing of the review process for this draft management plan. The proposed Federal Rule is also being reviewed at this time, but comments on that document aren't due until May 10, and the comment period will probably be extended. The WGFD risks committing to certain strategies and objectives that may be affected by any changes to the Federal Rule, which could necessitate a repeat of the process in which the WGFD is currently engaged. There appears to be some inconsistencies between objectives and triggers presented in this draft management plan versus those proposed in the Draft Federal Rule.

Finally, the Wyoming Wildlife Federation fully supports removal of the Yellowstone Segment of Grizzly Bears from the Endangered Species Act. We believe that Idaho, Montana, and Wyoming, along with cooperating federal agencies, have the management expertise to correctly manage this species so it remains off the list. States deserve the right to demonstrate their commitment to do so. We hope these comments will enhance the development of the Final Plan.

Thank you for the opportunity to comment on this plan.

Janet Marschner
President-Board of Directors
Wyoming Wildlife Federation