Wyoming
Department of Agriculture

Dave Freudenthal, Governor

John Etchepare, Director

2219 Carey Ave., Cheyenne, WY 82002 ■ Phone: 307-777-7321 ■ Fax: 307-777-6593
E-mail: wda1.state.wy.us ■ Website: wyagric.state.wy.us

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January 4, 2005

Wyoming Game & Fish Department
Attn: Grizzly Bear Occupancy
5400 Bishop Blvd.
Cheyenne, WY 82002

Dear Wyoming Game and Fish Commission and Department:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the Wyoming Game & Fish Department (WGFD) Grizzly Bear Occupancy Management Proposal.

Our comments are specific to our mission within state government which is to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal will have major impacts upon our agriculture industry, our natural resources and the welfare of our citizens, we believe it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

We support your efforts of the WGFD to plan for the delisting of the grizzly bear as a Threatened Species from the Endangered Species Act. It is in the best interest of the grizzly bear and resource users that the grizzly bear be delisted as expeditiously as possible. We support the Grizzly Bear Occupancy Management plan with consideration of the following concerns.

Grizzly Bear Population

The Occupancy Plan on page nine states: "Once distribution and population objectives have been met in the Grizzly Bear Conservation Area (GBCA), mortality thresholds will be reevaluated to support CS population objectives...." The mortality threshold for the 18 Bear Management Units was determined in advance at 4% without knowing the actual population. We ask you to include in the plan a detailed description of the mortality threshold and establish a population maximum for the Secondary Conservation Area (SCA). There has yet to be any population estimates besides "low population density" standards set inside the SCA. Public announcements should be used to notify local residents as well as recreationalists in these areas of current population estimates and locations for safety and reduction of conflicts.

Future Expansion
The grizzly bear occupancy plan creates a plan for the future, but assumes that if there are oil and gas developments, or a planned timber harvest, grizzlies will not inhabit the area. It's been proven that grizzly bears have grown in population with a multitude of uses in the same areas.

The same will be true in the SCA in the future. The oil and gas and timber industries are cyclical and could decrease over time, leaving the SCA even more remote and undisturbed. According to your maps in the Plan, there is an indication of prime habitat with denning potential, large tracts of white pinebark, and quality corridors to move well into the SCA. As the bear populations increase in these habitats and surround agricultural lands, agricultural operations are sure to be adversely impacted.

Agricultural Impacts
The Grizzly Bear Occupancy Plan consists of a vast area, much of which is occupied by livestock either on private lands or on BLM and Forest Service grazing allotments. The lure of selling off ranches for inflated real estate prices will become more tempting as ranching becomes economically nonviable with the loss of sheep grazing allotments and livestock depredation from the grizzly bear. The ranches sold will forever change the landscape, forever reduce bear habitat, corridors, and prey, and forever increase human/bear conflicts.

Chapter 3, Affected Environment and Environmental Consequences from the USDA Forest Plan states: *Livestock grazing can be used as a resource management tool to manipulate the range resource toward a desired condition. Livestock grazing, in addition to providing forage for livestock, can be used to change the seral stage of the plant community, remove decadent plant growth to rejuvenate forage species, reduce fine fuels, or improve the quality of forage for wildlife.*

Therefore, it is crucial to keep bear population densities to a set and established number to stabilize livestock depredation on private and public lands. As sheep allotments are phased out, the option to increase flock sizes during high lamb prices will no longer be possible. This year is an example where lamb prices are the highest in years and ranchers are restocking their flocks. This will not be an option with the current plan.

Wyoming livestock producers will not be the only agriculture producers detrimentally affected with the expansion of the grizzly bear. The numerous established fruit trees and berry bushes in the SCA will continue to be an invitation for human/bear conflicts. These conflicts will undoubtedly create a decrease in demand of these trees and bushes and inevitably a disastrous halt of sales at the nurseries.

Secondary Conservation Area
We have multiple concerns with the SCA. The draft Occupancy Plan continues to lack specific details about expansion, relocation, and hunting. According to your survey results on page five, a majority of residents would support a management plan that would allow grizzly bears to expand into the Wyoming Range (73%), the Wind River Mountains (67%) and the Big Horn Mountains (66%). We commend you for seeking the public's opinion on expanded habitat, and using your

expertise to not include all habitats in the draft. For example, on page nine it states: "In the portion of the GBCA bisecting potentially suitable habitat that is currently deemed socially unacceptable (the Wyoming Range, the southern Wind Rivers, and on private property adjacent to the GBCA), grizzly bears will likely disperse outside the GBCA".

However, it is naïve to think the bears will not move well beyond the Wyoming Range or use the Montana and Wyoming border as a corridor to reach the Big Horn Mountains in the future. According to this Sublette County website;
http://www.visitsublettecounty.com/destinations/wyomingrange.htm

"These mountains are home to elk, moose, deer, antelope, grizzly and black bear, mountain lions, lynx, and many other species of wildlife."

The bears are already there and their presence is being used as a promotional ploy for tourism. Clearly there needs to be a management strategy broader than the one currently proposed.

The grizzly bear population density is already at its peak inside the PCA. Originally the PCA was supposed to be large enough for sustaining a healthy bear population. However, now the SCA is being used for population expansion and relocation of bears. The SCA should not be used for bear recovery, even if the bear is already present.

The Plan acknowledges the SCA as being a place where bears will encounter conflict. Are you prepared for this perpetual problem? In 2004, there was a male bear killed who was relocated three times before being shot. How many chances should a bear have when livestock depredation is a perpetual problem? Will ranchers understand the difference between the PCA and SCA when they graze and have depredation in both areas with different forms of management?

Hunting has been proposed as a population management tool in the SCA. It is in the best interest of the bear and the program to have hunting occur inside the PCA. Female bears may also have to be included in these hunts. The population will steadily climb and bears will disburse themselves throughout the SCA. This new population may very well be largely made of females since the male population will be opened to hunters. Females in search of mates will encounter conflict, cross private lands, and prey upon livestock.

Education

We commend the educational components being implemented to increase the public's awareness about grizzly bears. We encourage you to continue these efforts at all levels. There are two areas which must be addressed. The first is meeting with or educating non-resident hunters about grizzly bears. These hunters are often going into grizzly bear territory with no preparation or tools such as bear spray. It is also crucial to educate new home buyers about living in grizzly bear habitat. It is a fact that many of these buyers are completely oblivious to what attracts bear, how to deter them, and how to live without constant contact.

In closing, we believe the delisting of the grizzly bear is crucial, but management of the bear will have to increase significantly as the population increases. The agriculture industry is very important to the state of Wyoming and its open spaces. Our producer's livelihoods and their

Contributions to open spaces, and wildlife habitat and corridors should take precedence over the inevitable explosive population growth of the grizzly bear. We urge you to keep the PCA for the bears, keep the SCA for multiple-use, and avoid turning the SCA into another PCA.

Thank you for the opportunity to comment.

Sincerely,

John Etchepare
Director

JE/jw

cc: Governor's Planning Office
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Rocky Mountain Farmers Union
Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation
Wyoming State Grazing Board