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November 9, 2004

R2 Grizzly Bear FP Amendments
c/o USFS Content Analysis Team
P.O. Box 22810
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To members of the Content Analysis Team:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the Forest Plan Amendments for Grizzly Bear Conservation for the Greater Yellowstone Area National Forests.

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 these amendments 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.

The WDA is in support of the efforts of the U.S. Forest Service to amend forest plans to provide essential grizzly bear habitat as an ultimate effort to delist the grizzly bear. It is our understanding that the amendment of these forest plans fulfills a major requirement for delisting. It is in the best interest of the grizzly bear and resource users that the grizzly bear be delisted as expeditiously as possible. For this reason, we ask that any delays to the plan amendment process be addressed quickly and adequately.

We support Alternative 2, the proposed action and preferred alternative. Our comments address many of the primary issues outlined in the amendments.

Commercial Livestock Grazing

The level of forage utilization by domestic livestock grazing in the Primary Conservation Area (PCA) is minimal, and therefore grazing has a small and insignificant impact on bear management. The issue is bear impact on livestock management, especially that being seen in sheep allotments. The closure of allotments is only one way to manage for the grizzly bear, but it does nothing positive when managing for livestock and the resource. If the closure of an allotment is needed due to unmitigatable bear conflicts and is willingly accepted by the permittee, we suggest the amendments allow another open allotment, outside the PCA, be located for that permittee. These amendments are for individual forest plans, and can therefore encompass the entire forest, not just the area of the forest covered by the PCA. This will ensure that no net loss of AUM's is incurred.

The Wyoming Department of Agriculture

is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

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It is listed in Alternative 2, Standard 3 of the plan amendments to “monitor, evaluate, and phase out remaining domestic sheep allotments”. Phasing out allotments does not and should not, always follow the monitoring and evaluation of the allotments. This can be a poor management decision if not supported by short and long-term monitoring. In fact, the monitoring and evaluation could allow for an increase in livestock numbers, due to under utilization of the forage. It is also stated in the amendments that an increase in permitted cattle numbers would be allowed only after an analysis by the action agency to evaluate impacts on grizzly bears.

We will recommend that Standard 3 read: “monitor, evaluate and determine the proper stocking level of livestock in the allotment”. We recommend that Standard 3 absorb much of this language and eliminate the upfront desire to phase out all livestock. Conservation of the grizzly bear in the Yellowstone ecosystem can occur with livestock present.

As noted previously, given those situations of unmitigatable conflicts and permittee acceptance, we support the alternative for resolving conflict by moving cattle to a current vacant allotment with less likelihood of conflict, versus the phase out of cattle grazing. There are many ways to manage livestock and grizzly bears in the same habitat, without automatic removal of the livestock. As mentioned in the amendments, selective removal of adult male grizzly bears may also be a possible management option. The WDA encourages the Forest Service to cooperate with livestock producers in developing grazing plans that avoid grizzly bear predation. Considerations could include bear feeding and movement habits to avoid conflict with livestock.

As expressed in the amendments, only 12% of the documented grizzly bear mortalities since 1975 have been livestock related. We will recommend that all livestock allotments remain open, regardless of use by livestock. Science is ever advancing and is continually finding solutions to natural resource impacts. We can only anticipate a day will come when bear repellent can be worn by domestic livestock or other situations are found. Having an open allotment will allow this habitat to continue to reap the positive benefits of livestock grazing.

As stated in the amendments, livestock grazing can be used as a critically important resource management tool. The particular citation from Chapter 3 Affected Environment and Environmental Consequences deserves repeating:

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.

Changes to the PCA Boundary

There is no need to increase the size of the PCA. Yellowstone grizzly bear populations have expanded and flourished under the current PCA size limits, with all delisting criteria being met or exceeded. Alternative 4 is unacceptable and contrasts with the entire forest plan amendment effort. More restrictions are not needed for bear survival, as it will be quite disingenuous to ask for yet more habitat in a document that charts the success of the bear's recovery.

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The amendments state that upon delisting the State of Wyoming will manage grizzly bear populations as directed by the Conservation Strategy and the Wyoming grizzly bear management plan. The Wyoming Game and Fish Department (WGF) have currently outlined the acceptable areas for grizzly bears outside the PCA, thus providing additional rules and regulations for increased range of the grizzly bear. This Secondary Conservation Area, as outlined and managed by the WGF, will suffice for any proposed increase in the PCA. There is no need for an increased PCA; we recommend you remove Alternative 4 from further consideration.

Adequate Habitat Standards

As mentioned in the amendments, the grizzly bear population achieved their demographic recovery goals by 1998 with a multiple-use management regime in place. More restrictive habitat standards are not needed. Current management under the present habitat standards has shown that the grizzly bear population can grow and sustain. This management includes domestic livestock presence, snowmobile use, oil and gas development, timber harvest, and other assorted multiple uses on the resource.

Some respondents will undoubtedly feel that a more restrictive approach is always needed, regardless of the lack of scientific merit used to justify their farce claim. However, we are all aware that the grizzly bear population has met its recovery goal and sustained that level for the last six years. The habitat standards under current management will provide for further grizzly bear recovery.

The Forest Service supports multiple use of the habitat. The PCA is not entirely a national park; as the majority of the land base is national forest. While more restrictive management can occur within the national parks, less restrictive management is needed on forest service lands to meet the needs of other resource users. Alternative 3 addresses more restrictive habitat protection criteria within the PCA, making the multiple-use agenda of the Forest Service nearly nonexistent. There are more users of the land in the PCA than just the grizzly bear, and management should allow for those uses. More restrictive standards are not needed. Alternative 3 should be removed from further consideration along with Alternative 4.

To ensure all habitat in these areas can meet the current habitat standards, we encourage the Forest Service to continue with Executive Order 13112 which provides the guidance for control of noxious weeds and invasive species. As stated in the amendments, noxious weeds and invasive species can disrupt grazing patterns, reduce palatable forage on big game winter ranges, increase the intensity and frequency of natural fires, lower water tables, and increase soil erosion rates. For these reasons, controlling noxious weeds inside the PCA will not only benefit the grizzly bear populations; but will provide a weed-free habitat for domestic livestock and wildlife. This grazing will also aid in the disappearance of noxious weeds and invasive species.

Social and Economic Effects

As stated in the amendments, reduced grazing could accelerate the breakup of ranches into subdivisions in the GYA if ranching is not economically viable. This claim should be the most important issue to be addressed in the amendments, as the impacts of subdividing private ranch land in the GYA will have an extreme-demonstrative effect on the grizzly bear populations, their prey base, and available open space and habitat. This subdivision of private ranchland is far worse on the ecosystem, especially when compared to the minuscule utilization of forage by livestock in an

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allotment. Private ranch land relies on federal grazing for social and economic productivity. If grazing permits are removed, the Forest Service can count on the eventual removal of habitat on the private rangeland. Alternatives 3 and 4 will have a significant adverse financial impact on ranching, and therefore, a potentially devastating impact on wildlife, including the grizzly bear.

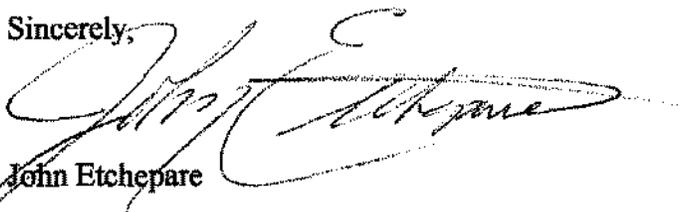
Education

We believe that educating people about living, working and recreating in the presence of grizzly bears is not solely the responsibility of the WGF and the U.S. Fish and Wildlife Service. With the current and future restrictions; including food storage, carcass handling, and camping; we will support the Forest Service in their educational efforts on restrictive issues. A majority of PCA resource visitors are not local residents. The Forest Service is in desperate need of additional handout information and interpretative site locations for tourists and sportsmen to understand the relationship needed to recreate in grizzly bear habitat.

In closing, we believe proper grizzly bear management can effectively coexist with proper livestock management. It is also important to remember, that while there have been recent increases in bear conflicts with livestock in the GYA, the number of allotments, stocking rate, and distribution of livestock inside the PCA since 1998 has not precluded achieving recovery of the grizzly bear. We strongly support adoption of Alternative 2, with the corrections listed above.

Thank you for the opportunity to comment.

Sincerely,



John Etchepare

JE/mh

CC: Governor's Planning Office
Wyoming Farm Bureau Federation
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Game and Fish Department