



# Wyoming Department of Agriculture

2219 Carey Ave., Cheyenne, WY 82002 ■ Phone: 307-777-7321 ■ Fax: 307-777-6593  
E-mail: [wda1@state.wy.us](mailto:wda1@state.wy.us) ■ Website: [wyagric.state.wy.us](http://wyagric.state.wy.us)

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February 10, 2006

Grizzly Bear Recovery Coordinator  
U.S. Fish and Wildlife Service  
University Hall 309  
University of Montana  
Missoula, MT 59812

Dear Grizzly Bear Recovery Coordinator:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the Draft Document Reassessing Methods to Estimate Population Size and Sustainable Mortality Limits for Yellowstone Grizzly Bear (*Ursus arctos horribilis*) Population.

Our comments are specific to our mission within state government: dedication 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, it is important to inform us on proposed actions and decisions so we can continue to express pertinent issues and concerns.

We commend the United States Fish and Wildlife Service (USFWS) on their efforts to recover the Yellowstone Grizzly Bear over the past 30 years. Millions of dollars have been spent to monitor, trap, research and rehabilitate the grizzly. Current estimates reveal the bear is on the road to recovery and has exceeded expectations. While the population of bears is not and will never be back to Lewis and Clark's estimated 50,000 bears, there is a viable population inhabiting the Greater Yellowstone Area (GYA). We have read the transcripts from the public hearing in Cody, reviewed the Distinct Population Segment (DPS) Boundary and Suitable Habitat map, and reviewed the report titled Reassessing Methods to Estimate Population Size and Sustainable Mortality Limits for the Yellowstone Grizzly Bear. We offer the following suggestions and comments regarding the delisting of the grizzly bear and estimating population size and mortality limits.

### **Consider Delisting the Grizzly Bear**

The transcripts from Cody, Wyoming in early January 2006 reveal a mixed message between delisting and continuing to list the grizzly bear. Some comments reveal a need for additional locations to give public comment, such as Seattle, New York, or Denver. We strongly disagree with these suggestions, as these city dwellers are not the ones to encounter grizzlies on a daily basis. The ranchers who commented in Cody have valid points about grizzly bear management, on-site encounters, and strongly support the delisting of the grizzly. These local people have seen first hand how the bear has recovered and can give personal testimony of how the bears have

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expanded their territories. We strongly urge you to consider the WDA's and locals' opinions of delisting the grizzly and continue to support the Wyoming Department of Game and Fish (WGFD) in their endeavors to implement the Wyoming Grizzly Bear Management Plan (Plan). The State of Wyoming and WGFD staff work steadily to manage the bears, physically and financially, despite the bear being listed under the federal Endangered Species Act. Federal funds currently spent on grizzly bears will be available for other endangered species once the bear is delisted. The state is a proven advocate for grizzly bear recovery and we insist the USFWS give our state the opportunity to manage the bears utilizing the WGFD Plan.

#### **Avoid DPS status to remain only in Northwest Wyoming**

The inclusion of the Yellowstone grizzly bear as a DPS is an important step in the ability of the USFWS to delist the bear. We insist the DPS designation be statewide for the grizzly bear. The bear is expanding its territory in all "suitable" areas outside of Yellowstone and Grand Teton National Parks. Bears expanding their territories will inevitably reach the Southern Wind Rivers, Big Horns, and Wyoming Ranges. While the Plan specifically excludes these areas, bear advocates can possibly list these bears as endangered, despite their genetics coming from the original DPS.

In addition to DPS, there is a discrepancy between suitable bear habitat designated by the USFWS and the WGFD. The USFWS included all of the Wind River Range, whereas the WGFD maintains "the biologically suitable and socially acceptable habitats in the Wyoming portion of the Greater Yellowstone Area occur north of the Snake River Canyon and Hoback River, which includes a contiguous region bounding the Absaroka Range and that portion of the Wind River Range north of Boulder Creek." The USFWS has approved Wyoming's Plan and we strongly urge its use hereafter.

#### **Utilize Carrying Capacity in Decision of Population Size and Mortality Limits**

We have reviewed the document Reassessing Methods to Estimate Population Size and Sustainable Mortality Limits for the Yellowstone Grizzly Bear. The document goes into great depth of how the USFWS estimates grizzly bear populations. We believe these estimates are simply that; calculated estimates. It is virtually impossible to know the exact number of bears in a given area. Considering the USFWS is estimating populations and mortality limits, we urge you to estimate the actual carrying capacity of the area. There will be a significant statistical correlation between population size, mortality and carrying capacity. We believe it is important to know what the habitat can withstand, and the WGFD and USFWS can manage accordingly.

#### **Require additional bear training to those who recreate in grizzly territory**

Human conflict with bears is a primary reason for bear mortalities. Many Wyoming residents who hunt, fish, and recreate in grizzly populated areas know the risks, and take appropriate steps to deter a bear encounter. However, there are residents and non-residents who fail to come prepared or make fatal errors, leaving them vulnerable to maulings, camp destruction, or other encounters. We believe the WGFD and USFWS should require all hunters to carry bear pepper spray and hang their meat immediately following a kill. Bear-damaged big game carcasses are not a reason for a bear's death. Instead, WGFD should permit affected hunters an additional

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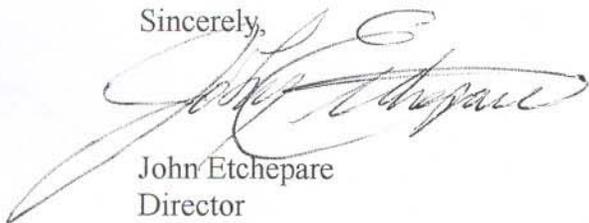
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opportunity to harvest another animal. In general, we see many educational opportunities for all who recreate Wyoming's outdoors to alleviate human to bear conflicts.

The WDA supports the USFWS in the grizzly delisting process. There are some inconsistencies to iron out before the USFWS finalizes delisting. We urge the WGFD and USFWS to work cohesively to resolve these issues. We strongly believe in the WGFD in their ability to manage the grizzly while still satisfying the needs of Wyoming's citizens. The sooner the delisting process takes place, the sooner Wyoming can implement its Plan.

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 Game and Fish Dept.