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*The Wyoming Department of Agriculture is dedicated to the promotion and enhancements of Wyoming's agriculture, natural resources and quality of life.*

April 5, 2016

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

To Whom It May Concern:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to Wyoming Game and Fish Department's (WGFD) Draft Wyoming Grizzly Bear Management Plan (Plan).

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 Plan impacts our agriculture industry, our natural resources, and the welfare of our citizens, we believe it is important you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

The WDA appreciates the WGFD's effort to revise the Plan with the intent of delisting the grizzly bear and reinstate management at the state level. We are in full support of the proposed Plan and offer the following comments.

The expansion of grizzly bear populations and habitat has significantly impacted the livestock grazing industry. Thousands of acres of federal grazing permits are no longer stocked with domestic livestock throughout the Shoshone and Bridger Teton National Forests due to increased interactions and depredations from grizzly bear. The ability for transfer of grazing permits from one producer to another has substantially been impacted, simply based on grizzly bear occupying the allotments. Livestock grazing permittees are also impacted by increased federal regulations to address grizzly bear conflict by including food storage orders, carcass removal, nightly penning of sheep, and other Terms and Conditions to their permits.

WDA recommends the Plan provide more information regarding the relocation process. We would encourage including WGFD Commission relocation policy for grizzly bear as an additional Appendix. If grizzly bear populations are at carrying capacity in the Primary Conservation Area, we are concerned the WGFD will begin relocating grizzly bears within the Plan's proposed Demographic Monitoring Area (DMA).

The DMA includes all of the Wind River Range, in comparison to the 2005 Grizzly Bear Data Analysis Unit, which only included the north portion of the Wind River Range. Based simply on verified grizzly bear-human

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conflicts map page 19 of the Plan, grizzly bears are in fact already at the extreme south end of the Wind River Range. We do not support relocation of grizzly bear south of the original 2005 Data Analysis Unit.

The Plan also states under "Relocation" WGFD will not relocate grizzly bears to manage conflicts into unoccupied habitat. According to the maps in the Plan on page 19, there is a significant expansion of grizzly bears between 2000 and 2015, and we assume this will continue. We would request WGFD develop a map differentiating where occupied habitat is and where unoccupied habitat is. The 2005 Wyoming Grizzly Bear Occupancy Management Guidelines may assist in providing guidance, but also needs updating.

Again, WDA supports WGFD updating and issuing the Final Plan, with the additions of relocation policies and clear expectations of what is acceptable occupied habitat. We appreciate the opportunity to comment. If you have questions, please contact Justin Williams, Senior Policy Analyst at 307-777-7067.

Sincerely,



Doug Miyamoto  
Director

DM/jw

CC: Governor's Policy Office  
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Wyoming Stock Growers Association  
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