

April 14, 2016

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

Dear Director Talbott,

Subject: Jackson Hole Conservation Alliance comments on the Wyoming Grizzly Bear Management Plan

Thank you for the opportunity to comment on Wyoming's Grizzly Bear Management Plan.

The Alliance represents over 2,000 constituents in Teton County, WY, and works to protect the wildlife, wild places, and community character of Jackson Hole. Our work empowers the whole community to live in balance with nature. We envision healthy and sustainable wildlife populations with protected wildlife habitat. We strive to ensure that wildlife and their habitat are managed by our agency experts based on science, facts, and data without political interference. For grizzly bears, we envision a healthy, well-managed, and thriving population of bears in the Greater Yellowstone Ecosystem (GYE), well connected to other grizzly populations in the continent and with minimal levels of human-bear conflict.

The growth of the grizzly bear population in the GYE over the last five decades is a conservation success to be celebrated. We appreciate and commend the work done by Wyoming Game and Fish Department (WGFD) in cooperation with our federal land and wildlife management agencies, conservation non-profits, and landowners to achieve this conservation success. This outcome is also a clear demonstration of the power and efficacy of the protections afforded to wildlife under the Endangered Species Act (ESA).

In the future where ESA protections for grizzlies in the GYE may end and WGFD takes over the authority for managing bears, we ask that you institute policies in your management plan that safeguard a sustainable future for grizzly bears in our region.

We submit these comments on the draft Wyoming's Grizzly Bear Management Plan (GBMP) so that management actions reflect progress toward that vision. Broadly, we ask that management actions protect bears within a core area comprising lands in and around Yellowstone and Grand Teton National Park and adjacent Wilderness Areas. We also encourage management actions in the Demographic Monitoring Area (DMA) and further that would increase biological and socially acceptable habitat so that the bear population can grow and expand in range. We ask that WGFD continue their efforts to proactively reduce conflict with humans through programs such as Bearwise. Finally, we

oppose the sport hunting of grizzly bears, especially in Jackson Hole, WY, and do not believe that it is currently necessary to manage a stable bear population. Nevertheless, we recognize that hunting may be used as a management tool and provide suggestions for how it may be more responsibly managed. Below, we provide more detailed comments explaining these points.

Adaptive Management Criteria: Demographic Recovery Criteria

Overall, the GBMP is unclear about management objectives for the population. While it outlines three recovery criteria and mentions that specific management objectives will be established by the commission (pg 2), the document does not explicitly identify what those management objectives would be or how they would work. We strongly urge you to outline specific objectives that will clarify that WGFD commits to maintaining the long-term stable population.

Demographic recovery criteria 1 (Adaptive Management Criteria) requires the maintenance of minimum population of 500 bears combined. This suggests that the objective is to manage for a population of at least 500. But, the plan also states that a requirement of 48 females with cubs equates to approximately 600 grizzly bears. Further, the population size dependent mortality thresholds in demographic recovery criteria 3 are intended to maintain a population within the 600-747 range. This suggests that the objective is to manage for a population of at least 600. Taken together, these statements are confusing. We suggest clarifying the criteria to say that a minimum population of 600 will be maintained, such that these numbers are not at odds.

Further, we emphasize that the rationale underlying criteria 3 be better explained. The choice of mortality thresholds and 600-747 population size range is driven by the biological fact that this represents the long-term stable population estimate. The intent here is to maintain a stable population. If future population estimation methods change then those methods must reflect this same biological fact, not merely the number.

Management Strategies: Occupancy

Overall, we support the approach to tailor management actions based on the different zones. However, we believe that these actions could be improved in order to expand protections for bears in core National Park and Wilderness areas and reduce conflicts outside of these areas.

We appreciate that the State will take a conservative approach to managing bears in the Primary Conservation Area (PCA). The GBMP should also specifically state that bears within the boundaries of Grand Teton National Park, including Park inholdings and the John Rockefeller Memorial Parkway will be managed by the National Park Service. We believe that in such core areas, such as those within the National Parks and nearby

Wilderness areas, bear populations should be given highest levels of protection from human-caused mortality. Essentially, in these areas the bear population does not require a great deal of management to be regulated. Conflicts are minimal and habitat is suitable for the population to self-regulate. These areas also represent those places where bears have significant tourism value. Additional sport hunting mortality on these bears is unnecessary and inimical to maintaining a healthy core population.

Outside the PCA and within the DMA, we support the proposed management actions to maintain annual mortality below the thresholds explained in Table 1 (pg 4). We understand that these thresholds were designed to ensure a high confidence in a stable bear population based on a demographic model. We also note that three-state agreement that allocates mortality across Wyoming, Idaho, and Montana. We do request clarification on whether these state allocation thresholds, which are based on historic mortalities, account for mortalities within Park boundaries. If mortality within the Parks will be added to these state-level mortality thresholds then the total mortality including lands within the Parks and outside will likely be higher than that allowed in Table 1. This requires more clearly explaining how these mortalities will be allocated among the three states and the Parks.

Overall, management should strive to keep mortality below these thresholds. We strongly support and urge WGFD to take proactive measures to manage human-bear conflict so that mortality thresholds can be met. Existing data clearly shows certain areas are chronically high-conflict areas. We encourage WGFD to work with landowners and managers, livestock producers, and conservation groups like ours to use diverse tools to manage conflict. Experiences from other parts of North America and across the world where humans live with large carnivores can be a basis for attempting new approaches to reduce conflict. We fully support and encourage WGFD efforts such as Bearwise.

Outside the DMA, we note that WGFD intends management to discourage occupancy by grizzly bears because of a lower social tolerance for grizzly bears by the public. We believe that management and conservation should aim to support a robust and expanding grizzly bear population. There are several places outside the DMA where currently bears survive without high-levels of conflict. We do not agree that grizzly bear range should be limited by a somewhat vague notion of social tolerance. Over time, social tolerance may improve as people realize that bears can coexist with many human activities. Further, certain human activities change over time – recreational uses or grazing allotments can change making more habitat available to bears. This could result in additional areas being available for bears. Management should accommodate such future potential. Conflict management standards may also encourage human uses to support incentives for users, such as willing grazing permit retirements, to increase suitable bear habitat.

We strongly urge WGFD to consider the Nuisance Bear Standards (Chapter 4) of the

updated US Fish and Wildlife Service Conservation Strategy. We are not in favor of management and hunting motivated primarily to limit bear occupancy. Instead, we urge WGFDD to manage bears and people in these areas to find ways to reduce conflict so that social tolerance for bears may increase and bear populations could expand in distribution.

Population Monitoring and Management: Hunting

The Alliance opposes sport hunting of grizzly bears, especially in Jackson Hole, WY, and believes it is unnecessary for managing a stable bear population. However, in the event that WGFDD does utilize hunting as a management tool we suggest some actions to more responsibly implement hunting. We note as stated in the GBMP (pg 13-14), regulated hunting has played an instrumental role in the management of wildlife in North America, generates funding, and has public support. However, there is significant opposition to hunting grizzlies across the nation and in this State. We strongly urge WGFDD to consider public values, moral and economic, in managing any potential future hunting of bears. The GBMP must explicitly outline the economic value that bears represent from a wildlife-watching perspective and incorporate this fact into management actions.

First, we ask for a five-year moratorium on hunting post-delisting. This would allow the states to demonstrate their commitment to the grizzly bear population. Hunting strategies need to be crafted carefully – use this time to get it right. Last year, more than 50 bears were killed from human causes without sport hunting. The immediate need for hunting is not evident. Also, as the GBMP states (pg 15), research may show that there are differences in demographics and habitat use given the diversity of land uses and habitat. Further, it states that understanding these differences may have implications for bear management outside the PCA. A delay of five years would provide an opportunity for some of these questions to be addressed before instituting hunting regulations.

Second, we urge WGFDD to consider directing hunting away from the PCA and areas around National Parks. In these areas, conflict is minimal. And, the economic value of bears from a tourism perspective significantly outweighs any need for sport hunting. This will mean that bears can have a well-protected core habitat and will acknowledge the enormous economic value that bears represent to the State of Wyoming.

Third, we understand that WGFDD intends to direct any hunting toward areas with high frequencies of bear-human conflict. We request that you consider strategies to direct actions toward problem-bears, not just problem areas. It is well known that a disproportionate number of conflict incidents are caused by a small number of bears. Focusing on those identified “problem bears” could be one way to reduce conflict. We raise this issue because it remains unclear whether reducing overall bear density alone is sufficient to reduce conflict. Hunting may not be the best tool to reduce conflict – other

proactive measures (food storage, removing attractants, etc.) are likely more effective.

Fourth, any discussion of hunt areas and quotas should account explicitly for the economic and tourism value of live bears. The economy of northwest Wyoming and the State depend heavily on wildlife-watching based tourism that requires live bears, visible to the public. Sport hunting bears is likely to impact this economic engine and must be taken into account while deciding upon hunt areas and/or quotas.

Finally, we urge the WGFD to consider directing hunting of bears away from roads. This measure would recognize the value that live bears pose as a tourism draw and provide for a more fair-chase aspect of any future hunting.

Population Monitoring and Management: Research and Monitoring

We support continued applied research on questions of management significance and WGFD coordination with our state and federal agencies, including the Interagency Grizzly Bear Study Team (IGBST) in furthering knowledge to better manage bears.

In the future if new population estimation methods are used, those estimates must be matched to the long-term (2002-2012) "Chao2" population estimate. The method must reflect the biological goal of maintaining a stable population.

Conflict Management: General

We support proactive management of bear-human conflicts and finding ways for bears and humans to coexist. We suggest modifying two standards (p21) to align with that in the draft Conservation Strategy. The standards stating, "Grizzly bears displaying aggression..." and "Grizzly bears displaying food-conditioned or habituated behaviors..." should be modified to include the word "unnatural" following standards in Chapter 4 of the draft Conservation Strategy. Bears displaying natural behaviors should not be targets for removal.

Conflict Management: Information and Education

We strongly support and encourage the State to continue proactive efforts to reduce human-bear conflict. Initiatives such as Bearwise are excellent examples of proactive, positive efforts that reduce conflict, protect bears and keep people safe. In Jackson Hole, the Alliance is proud to partner with WGFD and other agencies in our Wild Neighborhoods campaign to educate Teton County residents about measures they can take to reduce bear conflicts. We hope such efforts would continue and appreciate the collaborative nature of these initiatives.

We encourage greater emphasis on hunter education to carry bear-spray. The requirement for bear-spray for grizzly bear hunting may be extended to all big-game

hunters. Past conflict incidents show a high proportion of bear conflicts with big-game hunters. We also encourage continued efforts working with all recreationists on proper food-storage and how to travel safely in grizzly bear country.

Grizzly bear Management costs and funding

We appreciate that costs to manage and monitor bears are increasing. We further note that these costs would vastly exceed any revenue from a sport hunting program. We support the continued allocation of all necessary WGFD and state funds toward proper management, monitoring and research for bears.

Overall, we hope that you will consider these comments as you finalize this draft management plan. Thank you for your efforts in conserving and managing grizzly bears in Wyoming.

Sincerely,



Siva Sundaresan
Conservation Director