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May 8, 2016

U.S. Fish and Wildlife Service  
Public Comments Processing  
Attn: Docket No. FWS-R6-ES-2016-0042  
U.S. Fish and Wildlife Service  
MS: BPHC, 5275 Leesburg Pike  
Falls Church, VA  
22041-3803

Dear Sirs:

The Wyoming Wildlife Federation offers the following comments on the 2016 Draft Grizzly Bear Recovery Plan Supplement (Draft Rule). The Wyoming Wildlife Federation (WWF), established in 1937 and with current standing membership of approximately 5,000, is Wyoming's oldest and largest statewide conservation organization. Our mission is to work for hunters, anglers and other wildlife enthusiasts to protect and enhance habitat; to perpetuate quality hunting and fishing; to protect citizen's right to use public lands and waters; and to promote ethical hunting and fishing. We believe the agencies have done an admiral job in addressing the concern about potential impacts from the reduction in white bark pine cone production that was raised during the 2011 review process.

Land use agencies should be acknowledged for maintaining habitat standards over the last decade when they weren't required to under existing regulations.

#### Population and Demographic Recovery Criteria

We agree with the proposed changes in the demographic criteria based on the additional analysis completed by the Study Team (van Manen et al, 2015). The analysis demonstrated the reduction in growth rates for this population and for the first time analyzed the entire population data set from 1983 to 2011.

The population objective of 500 bears and maintenance of 48 females with cubs within in the Demographic Monitoring Area (DMA) are at odds. Forty eight females with cubs equates to approximately 600 bears, substantially higher than the 500 objective. The objective of 500 grizzly bears was initially established based on genetic viability research in the early 2000s. This research indicated that at least 400 bears were needed to maintain genetic viability for this population. Agencies then buffered that estimate and established a population objective of 500. This was the only information available that agencies could use to establish an objective as Chao2 methodology was in its infancy.

The Rule and state management plans establish population objectives within the DMA of 600 or more bears, which is consistent with the objective of 48 females with cub. To avoid confusion, we recommend eliminating discussion of the 500 objective. Or, discuss it to recognize its historical context, then clarify the greater relevance of and focus on the current objective, Demographic Recovery Criterion 3. The document should not leave the impression with the public that the population could potentially be reduced to 500 bears when the current population estimate is around 670 and all of the other demographic criteria revolve around that estimate.

There is some concern about the Yellowstone Grizzly DPS being at this point an isolated population with a perceived risk by some of genetic depression. For clarity, and to help alleviate that concern, some additional discussion of modelling and about other information on this topic would be helpful. A lot of research and deliberations have gone into ensuring future management avoids genetic concerns, and there should be more discussion to explain it and put the topic in perspective. The 48 females with COY is mentioned briefly, but more emphasis on the significance of this, as well as the potential ability to use an occasional male from another recovery area to ‘freshen’ the genetics of the Yellowstone population might help alleviate these concerns.

Table 1, p. 55 addresses total allowable mortality rates that should be followed to maintain the population at or near 674 bears. Table 3, p. 116-117 addresses the same issue but it is more detailed in that exact mortality limits (# of bears) are displayed in addition to the allowable percentages displayed in Table 1. The Wyoming Draft Management Plan and the Conservation Strategy (CS) also use a similar table. These tables should to be standardized in all the corresponding state and federal management plans to clearly illustrate consistency across those documents.

Page 58-59

The Rule indicates that all appropriate agencies will sign an MOU agreeing to terms in the Revised Conservation Strategy. We don’t see that commitment in the Wyoming Draft Management Plan.

Page 114

There appears to be differing management actions proposed to address issues should demographic criteria not be met. Proposed agency responses need to be standardized in the Rule and other management plans.

Table 2

This table differs from Table 2 presented earlier in the rule. Item 5 addresses allocation of discretionary take. Yellowstone National Park (YNP) is not listed as a participant, yet they are listed in the text of the Rule. We assume YNP will be involved in discussions related to allocating discretionary take.

Item 7-Management Review by IGBST:

The review process proposed in the Rule does not appear in the Wyoming Draft Management Plan. The Interagency Grizzly Bear Committee Study Team (IGBCST) has been a vital entity in the investigations of the Yellowstone grizzly bear DPS and in recovery and management planning for

that population. IGBST has promoted efficiency, close coordination and the collective expertise that have made recovery of this population a success. The states should clearly state the intent and commitment to remain active members of IGBST.

The Rule also addresses proposed data collection, specifically the number of radio collared females, which will be used to monitor this population. The Rule and the CS appear to be consistent, but again, we don't see the same level of commitment from the states. It is not realistic to assume that the states alone can manage all of the data collection and analysis that must be completed to manage take.

Page 142

The Rule indicates that the 2016 CS will remain in effect in perpetuity. This is not consistent with language in other documents. The states appear not to agree with this proposal.

Page 158

The Rule states that the Study Team and WGFD will take appropriate actions to protect moth aggregation sites should human activity adversely affect grizzly bear use of these sites. It should be noted that the majority of these sites are on National Forests. The U.S. Forest Service needs to address this issue.

Page 160

Agencies should acknowledge that white bark pine will eventually regenerate, and this will help ameliorate losses that have occurred. This should be monitored by the Study Team.

WWF favors delisting the Yellowstone Grizzly Bear DPC but only if the agencies can demonstrate a coordinated and consistent approach to manage bears post delisting. Based on our review of these documents, Yellowstone DPS managers do not appear to be at that point. Hopefully the inconsistencies between these documents can be rectified during this review process. We wish to continue to be involved in this important issue.

Thank you for the opportunity to comment on this plan.

Sincerely,

Janet Marschner  
President-Board of Directors  
Wyoming Wildlife Federation