



May 2, 2016

Wyoming Untrapped
PO Box 9004
Jackson, WY 83002

Daniel Ashe, Director, U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

Re: Docket FWS-R6-ES-2016-0042, Maintain Endangered Species Act Protections for Grizzly Bears

Dear Mr. Ashe:

Thank you to the United States Fish and Wildlife Service for the opportunity to comment on the proposal to remove Endangered Species Act protections from grizzly bears.

Wyoming Untrapped is dedicated to creating a safe and humane environment for people, pets, and wildlife through education and trapping regulation reform. We are opposed to the United States Fish and Wildlife Service's decision to remove grizzly bears from the Endangered Species List. One of the key reasons we oppose the removal of Endangered Species Act protections is due to the insufficient management plan that has been proposed by the Wyoming Game and Fish Department (WGFD). Specifically, we are opposed to a possible hunting season of grizzly bears within the state of Wyoming. Grizzly bears do not need an additional risk outside of the parks. They are presently subjected to many challenges outside of Yellowstone and Grand Teton National Parks, including a risk that isn't mentioned in the plan, trapping. Trapping for predators is allowed year-round on the borders of Yellowstone and Grand Teton National Parks. The plan does not address non-target trapping incidents of bears and how these conflicts will be managed.

It may be argued that grizzly bears are too large to be caught in a leghold, conibear or snare. However, in October of 2015, a grizzly cub was trapped near Cody, Wyoming. The cub's paw was caught in a conibear set for pine marten on a stump while the sow looked on in an agitated state. This situation presented a hazard to humans. An angry mother bear that is worried for her cub will act aggressively toward humans. The WGFD was notified of this incident, and responded within a few hours, but the danger was too high to resolve without additional resources. By the time the warden returned, the cub had dragged the trap a distance before it detached from its foot. The status of the cub is unknown. Even if traps do not directly kill the animal, they can cause significant injuries, ultimately leading to the death of the animal. The management plan states that "Female grizzly bears with dependent young (cubs of the year, yearlings, 2-year olds) and dependent young will be protected from hunter harvest." They will not,

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however, be protected from trapping inside the Primary Conservation Area (PCA), the Demographic Monitoring Area (DMA), or anywhere else in the state.

Any grizzly bear that travels outside of the boundaries of Yellowstone National Park, Grand Teton National Park, or the John D. Rockefeller Jr. Memorial Highway is subjected to trapping. Traps can be set directly outside of the park boundaries thereby endangering the lives and welfare of bears. We have asked for the WGFD to enact a ban on trapping within the PCA and the DMA. This ban would ensure that grizzly bears that are now expanding their range do not come into contact with traps and are inadvertently caught. However, the WGFD and Wyoming Game and Fish Commission (WGFC) have not been receptive to any of our requests to limit trapping in areas where it could harm threatened or endangered wildlife.

The management plan requires “Any person taking a grizzly bear to report the harvest to the WGFD office, game warden or biologist within 24 hours.” The management plan does not state that anyone catching a grizzly bear in a trap report this to the WGFD. The WGFD needs to require reporting of all non-target animals caught in traps so they are aware of where trapping is occurring and how frequently. We have requested this from the Wyoming Game and Fish Commission, in which they voted not to institute this policy.

The plan states that, “The Commission will ultimately take formal action on the proposed seasons, either adopting as presented, or making modifications based on biological data and social concerns expressed by the public.” The Commission has a decidedly skewed bias toward hunting and should not be the only decision makers in grizzly bear hunting seasons in the state of Wyoming. A board of seven people, appointed by the governor, do not represent all the citizens of Wyoming. We believe the majority of the public do not want our bears killed as trophies for the satisfaction of a few.

The plan states that “Regulated hunting is not only a pragmatic and cost effective tool for managing populations at desired levels; it also generates public support, ownership of the resource, and funding for conservation as well as greater tolerance for some species such as large predators that may cause safety concerns and come in conflict with certain human uses.” We disagree with this statement. Wildlife watching brings in millions of tourist dollars. As the second largest income source for the state, tourism is key to Wyoming’s economy. With the current downturn in energy production, tourism may become the primary income producing resource. Most people visit Wyoming to recreate on our public lands and view the watchable wildlife, with grizzlies being one of the most popular animals they wish to see. Bears are worth more alive than dead. Trophy hunting is not required for managing bear conflicts; the WGFD is already handling these without a hunting season. Co-existence is a more cost effective and socially acceptable tool. The economic value of grizzly bears to the Greater Yellowstone Ecosystem cannot be understated.

The state of Wyoming is not prepared to take over management of grizzly bears. The Wyoming Game and Fish Department and Wyoming Game and Fish Commission have not identified all threats grizzlies will face once they leave the safety of the National Parks. Wyoming has already proved ineffective at predator management. Scientists report the last lynx was seen in Wyoming in 2010, the numbers of wolverines are precariously low, and there is an unlimited harvest of predators such as coyotes and red foxes. Wyoming has not been able to develop an acceptable management plan for

wolves, as wolves were immediately listed as predators and could be killed anywhere in the state, by any means except for a small trophy hunting area around the National parks. Within two years, wolves were relisted as endangered because of Wyoming's poor management decisions. The question remains, who will be the watchdog for the Wyoming Game and Fish Department and Commission if grizzly management falls into their hands? If at any time in the future, the Wyoming Game and Fish Department were to list grizzly bears as predators, it should void the delisting and the bears should be relisted as endangered immediately.

As a gateway community to the parks, we share our backyards with the grizzlies and understand the implications of living with these magnificent creatures. We welcome the return of the grizzly bear to its native range. We want to prevent the death of our beloved bears from trophy bear mounts, and as bragging rights with photos. Any non-target grizzly injuries or deaths by traps or snares can be totally preventable. Prohibiting all trapping, including both furbearer and predator trapping, in the PCA and DMA will ensure that bears are protected from this unaddressed risk in the proposed plan. However, it is almost certain that the WGFD and the WGFC will not take the necessary precautions and will mismanage grizzly bear populations putting them right back at risk of endangerment.

The reasons to support delisting are few with the reasons to support current protections for grizzly bears many. We sincerely request that the U.S. Fish and Wildlife Service take all public comments into consideration and keep protections in place for these iconic animals.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Robertson", with a long horizontal flourish extending to the right.

Lisa Robertson
Board President
Wyoming Untrapped
Jackson, WY