May 10, 2016

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
Re: Proposed Rule to Remove the Greater Yellowstone Ecosystem Population of Grizzly Bears from the Federal List of Endangered and Threatened Wildlife

Dear U.S. Fish and Wildlife Services,

The Wyoming Wool Growers Association would like to thank the Department of the Interior and U.S. Fish and Wildlife Services for the opportunity to comment on the Draft Plan to delist the grizzly bear population within the Greater Yellowstone Ecosystem (Doc. ID FWS-R6-ES-2016-0042-5073).

Since 1905, the Wyoming Wool Growers Association has represented Wyoming’s sheep and wool industry. We have served to protect and preserve the interests of sheep and livestock producers throughout the state and continue to advocate for the businesses, communities, and families that constitute the agricultural industry in Wyoming.

The Wyoming Wool Growers Association agrees that the Greater Yellowstone Ecosystem (GYE) population of grizzly bears has recovered and no longer warrants federal protection under the Endangered Species Act. We believe that delisting is necessary and that management of the species within that population segment should be handed over to the states. Any continued protection under the Endangered Species Act would likely degrade the integrity of the Act in the public eye. Though we support the delisting of grizzly bears within the GYE, we believe that the proposed plans by the U.S. Fish and Wildlife service will be detrimental to the sheep industry and will disproportionately impact sheep producers in relation to the many other external impacts that affect the population of bears within the GYE.

According to the original proposal to list the species as endangered in 1975, livestock grazing within the GYE was considered disruptive to the recovery of the grizzly bears within that region. Since then, sheep grazing has been drastically reduced all over the northwest region of Wyoming with the U.S. Forest Service reducing 91% of sheep animal months in the GYE. We believe that closures of grazing allotments in an effort to restore the grizzly bear populations have been disproportionate with respect to the inarguably larger threats to the population.
Since the listing of the grizzly bear as an endangered species, many organizations have come to understand that education and alterations in management practices will help reduce conflict and lead to the decline in the lethal management of bear/human interactions. This is the product of adaptation to conflicts and as a result, recreational activities have been able to continue within Yellowstone National Park and the surrounding ranges. On the other hand, the possibility of sheep producers to use innovative ways to manage conflicts with bears in a non-lethal manner has not been promoted or encouraged. Practices such as the use of livestock guardian dogs, special herding techniques, fencing stock out of prime habitat, altering season of use, reducing stocking rates, and rest rotation and deferred grazing systems, have not had the opportunity to be truly researched as to their effectiveness due to continued grazing closures in grizzly bear habitat. The closure of grazing allotments has underscored a false pretense that agriculture and wildlife management are incompatible and, consequently, agriculture always takes the loss.

Heavily cited throughout rulemaking decisions since 1975 is the assumption that grizzly bear predominantly target sheep over cattle. The USFWS states in the proposed delisting rules that, “Although grizzly bears frequently coexist with cattle without depredating them, when grizzly bears encounter domestic sheep, they usually are attracted to such flocks and depredate the sheep.” (pg 13185). The reasoning behind this premise is based off of insufficient and inherently flawed scientific research.

The USFWS names Knight and Judd (1983) as one source for their statement above to assert that grizzly bears are inherently attracted to sheep and not to cattle, leading to an increase in lethal management of bears on sheep allotments. While the study concludes that grizzly bears are less likely to depredate cattle and more likely to depredate sheep, a more detailed look of the methods show built-in flaws that by any scientific standards could only be due to poor procedures or even latent bias against the sheep industry.

In this study, Knight and Judd captured and radio-collared bears over a five year period in the Yellowstone region and tracked them in relation to grazing allotments and livestock depredations. Of an insufficient sample of 28 bears, five bears (18% of the study sample) were located because they were killing sheep on an allotment, or as Knight and Judd put it, “The five bears that killed sheep were trapped and instrumented as a direct result of depredations.” Out of all the bears in the study, these five bears were not just the only bears that were caught as a result of depredations, but they were the only five bears that were known to kill sheep exclusively. Only two other instrumented bears killed any sheep during their study and each of them were known to also kill livestock other than sheep. Yet they conclude that “instrumented bears that come into contact with sheep killed them.” when in reality it is more accurate to describe these sheep depredations as “all bears that killed sheep were instrumented.” Even the collection of their data was admitted to be biased against sheep depredating bears because “sheep were closely watched by a herder, sheep depredation was more detectable than cattle depredation.” These assertions by Knight and Judd that sheep are not compatible with bears are not based off of any of their recorded data, instead they are based on the idea that because cattle owners do not actually see the bears kill their
livestock, the threat to bears is not as great because management action is taken less often. This conclusion is flawed and is not supported when we look at bear-human conflict data.

The Wyoming Game and Fish Department (WGFD) reports the annual captures, relocations, and removals of grizzly bears that occur as a result of conflicts with humans or livestock, or as a prevention of such conflicts. Over the last eleven years, bears that kill sheep are the cause of only 5.05% of these conflicts, while bears that kill cattle are the cause of 34.01%, while 57.58% are the result of property disturbances and recreational activities. Yet the Forest Service has continually phased out grazing allotments in the GYE, including a disproportionate number of sheep allotments because of the false belief that sheep cause greater impacts to grizzly populations.

These WGFD reports from 2004 to 2015 show a rise in conflicts between grizzly bears and livestock despite the continued closure of so many grazing allotments. These conflicts, the majority of which are within the demographic monitoring area (DMA), are occurring despite records showing that the grizzly bear population within the DMA has stabilized due to density dependent factors and the intrinsic carrying capacity of the ecosystem. If the closure of grazing allotments was effective in prevention of conflict, a reduction of the availability of grazing should reflect a reduction of livestock conflicts with bears, which we do not see from the data provided. More importantly the data show the occurrence of conflicts has not impeded the population of grizzly bears in the area. Due to these findings, the WWGA believes that the push to close more grazing allotments in order to satisfy USFWS management criteria is an unacceptable.

We believe that this increase in conflicts is the result of the grizzly bears moving further into socially unacceptable habitat which includes grazing allotments as well as developed recreation sites, yet the Draft Plan does not require changes to recreational availability such as closing camping and backpacking areas or other developed sites that are known to have high levels of grizzly bear-human conflicts. The draft plan states that there has only been a reduction of 15 developed sites since 1998, which pales in comparison to the 91% of sheep grazing closures since the same year and even goes so far as to say that “we do not foresee that the existing number of, nor an increase in the number of, developed sites inside the PCA will pose a threat to the GYE grizzly bear DPS now, or in the future.” (pg. 13195). However, only a few pages later (pg. 13201) the Draft Plan states out of 135 management removals, conflicts at developed sites accounted for two thirds (90 bears), while livestock grazing only accounted for only one third (45 bears).

The Wyoming Wool Growers Association requests that the USFWS review its approach to livestock management within the GYE. It is evident that the GYE population of grizzly bears have posed unique management challenges, yet despite these challenges the bears have recovered. Any continued protection of the bears under the Endangered Species Act is unwarranted and could further degrade the integrity of the Act at the possible expense of species that may need protection in the future. The continuing protection of the GYE grizzly bear should be handed over to the states and the approach to management should be more informed and inclusive. The WWGA hopes that USFWS will seek to collaborate with the state of Wyoming, its livestock
producers, and the agricultural community in developing adaptive management techniques that preserve the rangeland as well as the grizzly bears.

The Wyoming Wool Growers Association appreciates the consideration of our comments and thanks the U.S. Fish and Wildlife Service and Department of Interior for reviewing our input. If there is a need for any further clarification or input, please feel free to contact us.

Sincerely,

Amy W. Hendrickson
Executive Director

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