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Department of Agriculture

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April 4, 2006

U.S. Fish and Wildlife Service
Western Gray Wolf Recovery Coordinator
585 Shepard Way
Helena, MT 59601

Dear U.S. Fish and Wildlife Service:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the rulemaking to establish a distinct population segment (DPS) of the gray wolf (Canis lupus) in the Northern Rocky Mountains (NRM) of the United States.

Our comments are specific to our mission within state government: dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal has major impacts upon our agriculture industry, our natural resources and the welfare of our citizens, we believe it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

We support the efforts of the Department of Interior, United States Fish and Wildlife Service (herein after "Service") in managing the gray wolves in the Greater Yellowstone Area (GYA) and the State of Wyoming. We also support the proposal to establish a DPS for the NRM gray wolf. However, we do have concerns regarding the Service denying the Wyoming Wolf Management Plan (herein after the "Plan"), using political pressure to make Wyoming change their Plan, and determining the future roles the state and federal governments will have after delisting. Our comments for the preceding issues and others are as follows.

Accept the Wyoming Plan

The Federal Register submitted on Wednesday, February 8, 2006 by the Service makes multiple condescending references to Wyoming's Plan. For example on page 6634,

"However, we have determined that Wyoming State law and its wolf management plan do not provide the necessary regulatory mechanism to assure that Wyoming's share of a recovered NRM wolf population will be conserved if the ESA's protections were removed. Therefore, we intend to conduct a future rulemaking to propose that the gray wolf in the NRM wolf DPS be removed from

the List of Threatened and Endangered Wildlife under the Endangered Species Act of 1973 (ESA), as amended, if Wyoming adopts a State law and a State wolf management plan that is approved by the Service."
The WDA supports the State of Wyoming and the Wyoming Game and Fish Department's (WGFD) submitted Plan.

The State of Wyoming and the WGFD took extreme measures to use the "best available scientific and commercial data" to compile the Wyoming Gray Wolf Management Plan. Eleven independent scientific experts, selected by the Service, reviewed the Plan. Ten of the eleven reviewers approved Wyoming's plan. Against the recommendations of the "experts" and the use of the best available science, the Service refused the Plan.

The Service is using the Federal Register as a "political tool" to pressure our state into changing its law and plan. We will not support a Wyoming plan that eliminates the predator status. The livestock producers across our state deserve the right and ability to control wolves when depredation of livestock occurs on their land. The trophy game status fails to provide economic security for our producers.

Provide Valid Reasons for State Management
The Service continues to bait the states of Idaho, Montana and Wyoming using the acceptance of state plans and state control. We fail to recognize how taking on a wolf population benefits each state. The truth of the matter is, the Service along with the federal government is overwhelmed with the physical and financial burden of wolf management. According to the Casper Star-Tribune article Who'll pay to manage wolves? on Monday March 27, 2006,

"Managing wolves in the Northern Rockies isn't cheap: The Fish and Wildlife Service estimates that for each year wolves remain listed, it will cost the government about $2.7 million."

Why would any state want to assume that immense financial commitment? It simply does not make sense. That figure does not include the additional money the state needs to reimburse livestock producers for their losses.

The state of Wyoming is not only not willing to take on the financial risk, but also to tackle the legal, ecological, and environmental ramifications bound to occur. We fail to recognize the overall "benefit" to our state by being gifted the ability to manage your wolves. The federal government is overwhelmed and looking for any opportunity to get out of the mess the wolves have created. Livestock depredations are statistically higher than predicted, ungulate

populations are dwindling faster than expected, the wolf populations are repopulating quicker than anticipated, and wolf dispersal is much greater than imagined. We ask you these questions: 1) Why should the State take on the daunting task when management of wolves already occurs? 2) Will delisting actually occur? 3) What difference will delisting make? 4) How will future management differ from current management other than differences in agencies?

The Service granted Idaho "state management" recently, but as need for wolf management arose, the state continues to lack the authority and must seek approval by the Service. The proposed removal of 43 of the 58 wolves in the Lolo pack in northern Idaho for the decimation of elk populations fails to materialize due to intense political pressure. The state of Idaho received 42,000 comments on this management tactic alone. This pressure will occur each time wolves are slated for removal. Therefore, we stand by our Plan using predatory status outside the designated trophy status areas.

Consider Yellowstone National Park

The majority of Yellowstone National Park (herein after the "Park") is in Wyoming. The Service demands Idaho, Montana and Wyoming each manage for 15 packs. However, the State of Wyoming has no jurisdiction for managing wolves within the Park boundaries. We are "gifted" with the moving target of wolf pack management based on how well the packs persist in Yellowstone. The 1987 Recovery Plan issued by the Service called for no less than 3,000 contiguous square miles. Wyoming's Plan provided twice that. Yet, this is still not enough. The Service wants the entire state. Wyoming refuses to be at the mercy of environmental lawsuits for the taking of wolves caught feeding on livestock in Eastern Wyoming.

Include Northern Colorado in DPS

The state of Colorado has seen wolves migrate from Wyoming. The Service addressed dispersal distance in the Register, stating only seven of nearly 200 known NRM wolf dispersal events from 1994 through 2004 were over 180 miles. This statement assumes the Service has records of all known cases. Currently, there are wolves residing and creating packs in parts of Wyoming more than 180 miles from the Park; but because they are in the non-essential experimental population segment area, it is uneventful. There have been two confirmed cases of wolves entering Colorado through Wyoming. This is only the beginning of a much larger dispersal. For the DPS, the Service should include northern Colorado as well as eastern Oregon, eastern Washington, and northeastern Utah.

List the DPS as Threatened

The Service requested comments regarding the possibility of establishing a Northern Rocky Mountain DPS for the gray wolf, but listing the DPS as threatened in Idaho and Montana, and excluding Wyoming. The Service continues to pin Wyoming into a corner using politics instead of science and threatens us to change our state's Plan. If Idaho and Montana want to have a DPS and are willing to accept the threatened status, we will support them in their endeavors. We have an issue with the Service requiring others who send in comments to support this new proposal doing the scientific and legal research. It is the responsibility of the Service to find an alternative to managing wolves, especially when they created the requirements for the DPS and want buyoff by the states involved.

In conclusion, we thank the Service for accepting our comments and considering them for NRM wolf management in Idaho, Montana and Wyoming. We ask the Service to reconsider Wyoming's Plan. Delisting wolves from the List of Threatened and Endangered Species is not an incentive. The burden of managing the wolves is intensive and too expensive. We offer you our current Plan, but will not change it based on political pressure. Wyoming has a positive track record of wildlife management, and wolf management under our Plan, can be just as successful.

Sincerely,

John Etchepare
Director

JE/jw

Cc: Governor's Planning Office
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Rocky Mountain Farmers Union
Wyoming Association of Conservation Districts
Wyoming Farm Bureau Federation
Wyoming State Grazing Board
Wyoming Game and Fish Department