Wyoming Department of Agriculture

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The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.

Dave Freudenthal, *Governor*
John Etchepare, *Director*

May 9, 2007

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 establishment of a distinct population segment (DPS) of the gray wolf (Canis lupus) in the Northern Rocky Mountains (NRM) of the United States and delisting this population.

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 believe the United States Fish and Wildlife Service (herein after "Service") are correct to begin the process of delisting the DPS of gray wolves in the NRM. The explosion of the wolf population has exceeded the Service's expectations and delisting is long overdue. We offer the following suggestions to the Service with the intention to expedite the delisting process, while supporting livestock producers throughout the NRM region.

Reconsider Future Hearing Locations:
The WDA recently attended the public hearings and open houses for wolf delisting in Cheyenne on February 27, 2007 and Cody on April 19, 2007. We strongly disagreed with the original decision to only hold one Wyoming public hearing in Cheyenne. The Service should have had most of their open houses and hearings in the heart of wolf country. It was only after the fact and due to Wyoming Congresswoman Barbara Cubin and Governor Freudenthal's efforts that an additional hearing was held in Cody, Wyoming. We highly recommend future public hearings be located in the towns in the wolf recovery areas.

Reconsider Wyoming's State Management Plan:
We support delisting the gray wolf in the NRM. The Federal Register notice displays two alternatives, both of which are contingent upon the Service's approval of Wyoming's Wolf Management Plan (herein after "Plan): delist wolves entirely in the NRM after Wyoming's Plan is approved or delist wolves in the NRM excluding Wyoming's Northwest corner.

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We strongly urge the Service to delist the wolves in all three states including Wyoming's Northwest corner. However, according to the Service, this delisting approach cannot happen until Wyoming's Plan is approved. We urge the Service to approve Wyoming's Plan.

Wyoming's House Bill 213 was an effort to convince the Service of Wyoming's genuine interest to manage wolves with trophy game and predator status, which supports the agriculture producers' interests, while still maintaining the viability of the wolf populations. Wyoming has proven its ability to positively manage its wildlife in all aspects. We strongly support the Wyoming Game and Fish Department's abilities and believe predatory status will not decimate the wolf populations in our state. Wyoming has negotiated with the Service on a number of issues; specifically one is to increase the minimum pack number from 10 to 15. The 15 packs will consist of an adult male, an adult female, and two pups as of December 31st. This is five packs more than originally proposed by the Service as scientifically necessary for stability and genetic viability.

We strongly disagree with the Service's territory for trophy status. When we review a map with the Service's proposed area and Wyoming's proposed area, we see how much is private property. We do not believe private landowners should have federal officials requiring them to use their land for wolf management. We insist trophy status remains on as much federal land and as little as possible on private grounds. As it stands, some landowners do not have that option. Many livestock producers were adamantly opposed to the wolf reintroduction in the beginning and are now just trying to maintain their livelihoods with increased depredations of their livestock and wildlife from both wolves and grizzly bears.

Review and Change Service Policies to Meet Citizens Interests

We support the use of peer reviewed scientific validation in all decision aspects regarding agricultural production and wildlife management. The Service boasts their use of science to make their decisions. However, we believe the numerous changes the Service has made in their policies and negotiations exhibit the inability to consistently transfer study results to areas outside the NRM. For example, the Service timeline to delist the wolves according to population growth trends from other states was not applicable to the NRM. Wolf populations grew much quicker than any biologist ever anticipated. The Service also assumed the wolves would stay primarily in the Northwest corner of Wyoming, which has also proven to be untrue. The number of wolves dispersing from the Northwest corner increases each year as the populations increase and territories are expanded. There were many concerned sportsman who said wolves would decimate wild ungulate herds, but the Service failed to recognize the negative impacts on outfitters, their businesses, the increased management and financial requirements forced on the State Game and Fish Department, or the added pressure of elk and bison to move off state feedgrounds onto private calving and lambing grounds due to wolf presence.

Montana and Idaho are the first to have their plans approved. We believe their plans lack management versatility using both trophy game and predatory status, resulting in a guaranteed

negative outcome for livestock producers. Consider how much wolves will disperse and inhabit private land in Montana and Idaho due to only having trophy game status, plus the lack of management options for livestock producers on livestock depredations, and little to no compensation for those livestock depredations. We are concerned the Service has failed to recognize that the science they have used thus far is not used in the best interest of those producers in the NRM who are negatively impacted by the wolves' presence. We adamantly insist the Service review the science, allow states to manage the wolves accordingly, and be willing to make adjustments as more scientific data becomes available from the NRM.

The WDA thanks the Service for the opportunity to comment. We want to reiterate the need to delist the wolf, approve the Wyoming State Plan, and review and correct the inconsistencies of requirements your agency imposed throughout the reintroduction of the wolf and how those requirements are negatively affecting the states inhabited by wolves.

Sincerely,

John Etchepare
Director

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