

# 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

November 7, 2008

Wyoming Game and Fish Department  
Attn: Bea Pepper  
5400 Bishop Blvd.  
Cheyenne, WY 82006

Dear Ms. Pepper:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the Wyoming Game and Fish Department's (WGFD) 2008 Draft Revision, Wyoming Gray Wolf Management Plan (Plan).

Our comments are specific to our mission within state government: dedication 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, it's important that you keep us informed of proposed actions and decisions and provide us the opportunity to express pertinent issues and concerns.

The WDA has supported the WGFD in meeting the demands of the United States Fish and Wildlife Service (Service) to delist the Rocky Mountain Gray Wolf. The recent decision by U.S. District Court in Montana is discouraging and disheartening. We will continue to support the WGFD to revise the Plan in pursuit of permanently delisting the wolf.

The issues raised by the Montana District Court provide the WGFD a roadmap to permanently delist. While we may not agree with all of the issues, we do want the WGFD to make a valiant effort to address these issues in the Plan without dismissing the concerns of the agriculture industry, hunters, outfitters and guides and others who are negatively impacted by these changes and decisions. We offer the following comments to address the four concerns brought up by the Service and most recently by the WGFD at the public meetings: natural genetic exchange, minimum population commitment, trophy management area and depredation control. We also have a few additional general comments.

## Develop Concrete Genetic Exchange Methodology:

One of the concerns raised in Wyoming's Plan consists of the lack of natural genetic exchange between wolf packs in Idaho, Montana and Wyoming. We do not believe the October 2008 Plan addresses this adequately and concretely. We strongly encourage the WGFD write a specific section with tangible and efficient ways to scientifically prove genetic diversity is occurring and will continue. We recommend each pack have at least two wolves wear radio collars at all times. The collars can track the movement of the wolves and prove packs have interacted. We also suggest the WGFD establish multiple hair snares in each pack's range. The captured samples will provide additional data to the Service indicating the movement of wolves between states and

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packs. If there are additional ways to capture the movement of wolves, which proves an exchange of genetics, we urge the WGFD to capture this in writing in the Plan.

Remain Firm on Management of 15 Packs in Wyoming:

We originally supported the 100 wolves in ten packs recommended by the Service. The need for a “buffer” extended the number to 150 wolves in fifteen packs. We supported the change in pack sizes with the expectation of delisting. However, we will not support a future revision of additional wolves to meet a new demand set forth by the Service. We support the current Plan and how the WGFD will manage for at least fifteen packs.

Remain Firm on Wolf Trophy Game Management Area (WTGMA):

The Service indicates they may seek an increase in the WTGMA in order to create migration corridors for wolves to encourage genetic diversity without them crossing through predatory areas. We will support the WGFD with the current areas, WTGMA, while the rest of the state remains a predatory management area. An increase in the WTGMA would devastate the livestock industry and substantially increase the depredation reimbursement expenses by the WGFD.

Reconsider Changes to Predatory Management:

We support the current Predatory Management Area and ability for livestock producers to shoot wolves on their land without waiting for depredation. However, the revised Plan on page 20 indicates *“the Department may issue “lethal take permits” authorizing property owners to take not more than 2 gray wolves in areas experiencing chronic wolf depredation...”*

This change to the Plan as written restricts landowners who have shot 2 wolves and a pack remaining and continually depredating on their livestock helpless.

We recommend the following: Additionally, the Department shall issue “lethal take permits” authorizing property owners up to 2 wolves per permit. Continuing depredation will constitute an ongoing permit without delay...

In addition to the lethal take permit, the WGFD indicates on page 34: *“Gray wolves may be lethally removed when, based on best scientific data and information available, the Department determines a wild ungulate herd may be experiencing unacceptable impacts or when wolf-wild ungulate conflict occurs at any State operated feedground, ...”*

As written, this gives the WGFD the ability to take wolves without a lethal take permit or a two-wolf cap. While we support the WGFD in their ability to remove wolves in support of wild ungulates, we can not support the double standard proposed. We urge the WGFD make wolf removal for either livestock or wild ungulates equal.

Finally, also related to the lethal take permit, *“...if the Department determines further lethal control may be immediately suspended or cancelled if the Department determines further lethal control may result in the relisting of gray wolves under the Endangered Species Act. In either of*

*these circumstances, non-lethal control actions shall be initiated to mitigate continued harassment, injury, maiming or killing of livestock or domesticated animals.*

We are concerned the non-lethal control is simply “initiated” by the WGFD, but the agency does not plan to implement, financially support, monitor or manage the non-lethal control methods your department proposes. The WDA can not accept this displacement of burden upon the livestock producers and landowners to become predator managers instead of ranchers, by spending their time and money managing for wolves for the Endangered Species Act.

We recommend the following: In either of these circumstances, non-lethal control actions shall be initiated, implemented and financially supported by the WGFD to mitigate continued harassment....

Consider our General Comment Concerns:

The Plan indicates on page 5: *“In the event the Commission determines there are less than eight (8) breeding pairs inside the National Parks for 2 consecutive years, the Department shall take actions to ensure the total number of breeding pairs inside the WTGMA is at least fifteen (15) breeding pairs.”*

This leads the public to believe the Commission has regulatory authority to manage wolves in the National Park.

We believe the Plan should read: In the event the National Park Service biologists determine there are less than eight (8) breeding pairs inside the National Park for 2 consecutive years, the biologists will notify the Commission and the Department shall take actions to ensure the total number of breeding pairs inside...

We highly recommend the WGFD revise the Plan to adequately address the concerns of the District Court and Service. We believe our state’s Plan can adequately meet the needs of the Service and prove wolves have a viable population and should be removed from the Endangered Species List. The WDA thanks the WGFD for their efforts to expedite this public commenting period and providing us the opportunity to comment.

Sincerely,



John Etchepare  
Director

JE/jw

11/7/2008

WGFD Wolf Management Plan

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Cc: Governor's Planning Office  
WDA Board of Agriculture  
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  
Guardians of the Range