



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

December 20, 2011

Fred Lindzey
President, Wyoming Game and Fish Commission
Wyoming Game and Fish Department
Office of the Director
5400 Bishop Boulevard
Cheyenne, Wyoming 82006

Mr. Lindzey:

The Wyoming Department of Agriculture (WDA) appreciates the opportunity to provide comments on the proposed policy VII W, regarding Translocation of Prairie Dogs in Wyoming for the Wyoming Game and Fish Commission (WGFC).

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 proposed policy has major impacts upon our agriculture industry, our natural resources and the welfare of our citizens, we believe it is important you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

We greatly appreciate the WGFC revising the policy for translocation of prairie dogs. The recent translocation of prairie dogs in the Thunder Basin National Grasslands created extensive concerns and issues for livestock grazing permittees and private land owners. We believe clarification of the policy for prairie dog translocation is timely and will hopefully reduce conflict in the future.

We offer the following changes in both this letter and Appendix A with "track changes" inserted to reduce confusion.

Clarify Background Section

The first sentence states *"Translocations may be conducted as needed by appropriate personnel working to implement a prairie dog management plan in conjunction with the following guidelines"* (underline added). We urge WGFC clearly specify what constitutes "appropriate personnel." We would prefer state or federal agency staff who work directly with the livestock grazing permittees or private landowners to trap and translocate prairie dogs.

The second sentence discusses the *"reestablishment of extirpated prairie dog populations"* We believe the WGFC should designate a specific timeframe for extirpation. The historic range of prairie dog colonies is very broad. We recommend only reestablishing colonies extirpated less than 15 years ago.

Include Additional Information in Guidelines Section

Section 2:

We believe more specific information is necessary for issuing permits, including the number of prairie dogs the agency personnel is expected to capture and release, the timeframe for capturing and releasing, and the contact

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information and summary of comments regarding the translocation or plan. Please see specific wording inserted into Appendix A.

Section 6:

We have added points of clarification, all of which are added to Appendix A. Additionally, we urge the WGFC change the word "permittee" to permit holder. The term permittee in the agriculture industry is defined as: One who holds a permit to graze livestock on state, federal, or certain privately owned lands. Syn. *lessee*. (Management, 1998)¹ We believe it is better to distinguish the two as distinctly different.

Section 7:

We added Section 7 to provide interested parties a minimum 20 day timeline notifying them of the WGFC permit approval. Please see specific wording inserted into Appendix A.

Section 8:

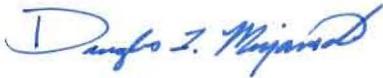
Section 8 is added to again provide specific information regarding the completion of the translocation. Please see Appendix A, Section 8.

Section 9:

We urge the WGFC to not issue any permit exceeding the seven month timeframe from July to January. As an example, the permit holder approved December 31, 2011 would have until January 30, 2012. The WGFC should ensure each permit adheres to the specifications provided, with additional information for noncompliance, such as revoking the permit or not approving future permit applications.

We appreciate the WGFC's efforts in improving the permitting process of prairie dog translocation. If you have additional questions, please do not hesitate to contact us.

Sincerely,



FOR Jason Fearneyhough
Director

JF/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
Wyoming Stock Growers Association
Wyoming Wool Growers Association
Wyoming Farm Bureau Federation
Wyoming State Grazing Board
Wyoming Association of Conservation Districts

¹

Management, S. f. (1998). *Glossary of Terms Used in Range Management*. Denver: Society for Range Management .

Appendix A

WYOMING GAME AND FISH COMMISSION

Issue Date: January 26, 2012
Authority: Fred Lindsey, President
Policy Number: VII W

TRANSLOCATION OF PRAIRIE DOGS IN WYOMING

Purpose

This policy provides direction in all instances regarding the translocation of prairie dogs in Wyoming.

Background

Translocations may be conducted as needed by state or federal agency staff working to implement a prairie dog management plan in conjunction with the following guidelines. Translocation projects should be primarily directed toward reestablishment of extirpated prairie dog populations extirpated not less than 15 years prior, enhancing populations ~~that are~~ lower than desired, or to meet other specific management objectives.

Guidelines

All translocation requests must be approved by the Wyoming Game and Fish Commission prior to any translocation effort. A contingency plan for managing prairie dog dispersal in reestablished colonies shall be a component of all translocation proposals.

- 1) Translocation of prairie dogs will be permitted for the following purposes only:
 - a. To remove prairie dogs on, or expanding onto private land;
 - b. To remove prairie dogs within 1 mile of a residence where the resident wants the prairie dogs removed due to concern for human health and safety;
 - c. To augment prairie dog colonies in a designated black-footed ferret recovery area;
 - d. To augment prairie dog colonies within a designated prairie dog management area.
- 2) Permit Requirements: A Wyoming Game and Fish Commission Regulation Chapter 33 permit (Governing Issuance of Scientific Research, Educational or Special Purpose Permits) and, if applicable, a Wyoming Game and Fish Commission Regulation Chapter 10 permit (Importation, Possession, Confinement, Transportation, Sale and Disposition of Live Wildlife) shall be required for each translocation request. For more information on these required permits and application process, contact the Department law enforcement coordinator.
 - a. The permit application shall include a specific plan proposal, incorporating:
 - i. Purpose of prairie dog translocation;
 - ii. Clearly identified donor and recipient colonies;
 - iii. Expected number of individual prairie dogs for capture and movement
 - iv. Map and legal descriptions;
 - v. Timeframe and expected dates relative to the capture and release
 - vi. Methods of prairie dog capture;
 - vii. Quarantine plan, if required (see item 5, below);

- ~~4) A list of all coordination contacts including their contact information, with a summary of their contact input; or comments concerning the plan, and,~~
- ~~5) Any other provisions requested by the Wyoming Game and Fish Department or Wyoming Game and Fish Commission.~~

- 3) The permit will specify methods of allowable prairie dog capture, will be specified in the permit issued.
- 4) Translocations:
 - a. Must occur between July 1 and January 31. Breeding and pup rearing seasons (i.e., February 1 to June 30) shall be avoided.
 - b. Should occur within the same County where animals are captured.
- 5) Quarantine:
 - a. Shall be required for all translocations of more than ten (10) miles between the donor and recipient colonies. Donor colony prairie dogs shall be quarantined for a period of twenty-one (21) days to ensure they are plague free.
- 6) Prior to permit approval, the Chapter 33/10 permit holder permittee or their designee shall meet and seek coordinate to seek consent with of all potentially affected private landowners and livestock grazing permittees, weed and pest control district boards, county commissioners, the Wyoming Game and Fish Department (WGFD), and state and federal land management agencies to avoid creating conflicts with other land uses (e.g., grazing) as a result of translocation.
- 7) If approved by the Commission, not less than twenty (20) days before the translocation occurs, the permit holder shall provide all potentially affected private landowners and livestock grazing permittees, weed and pest control district boards, county commissioners, the WGFD, and state and federal land management agencies notifications of the approved permit.
- 8) Not less than sixty (60) days after the completion of the approved translocation project, the permit holder shall provide the Commission a final report on the success of the translocation project including:
 - a. Number of prairie dogs captured;
 - b. Dates and locations (UTM coordinates) of capture;
 - c. Number of prairie dogs released;
 - d. Dates and locations of release;
 - e. Injury or loss of prairie dogs during the process;
 - f. Injury or loss of any non-target species during the process;The Commission shall hold on to the permit and request for not less than two (2) years and shall make both available at the request of the public
- 9) The Commission shall not issue a permit with an expiration date exceeding seven (7) months or beyond the current capture season.