

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.

Equal Opportunity in Employment and Services



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

March 11, 2009

United States Department of the Interior
Fish and Wildlife Service
Ecological Service
420 South Garfield
Pierre, South Dakota 57501-5408

Dear Fish and Wildlife Service:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the status review for a 12-month finding of the Black-Tailed Prairie Dog.

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 is important you continue to inform us of proposed actions and decisions and provide us the opportunity to express pertinent issues and concerns.

The WDA cannot and will not support the petition from environmental organizations to the United States Fish and Wildlife Service (Service) to list the black-tailed prairie dog as endangered or threatened. We offer the following reasons and comments regarding this status review.

The black-tailed prairie dog is an important prey species for many predators, including the endangered black-footed ferret. The prairie dogs also create habitat for other species, such as mountain plover. Therefore, populations and colonies are extensively monitored and mapped. Private landowners are very aware of their prairie dog populations. The black-tailed prairie dog, however, is considered a pest by many of these landowners. The thousands of prairie dogs in a single colony can dramatically reduce vegetation for livestock and other wildlife. In addition, the thousands of holes found in a colony can also cause extensive injuries to livestock and wildlife.

Much of the black-tailed prairie dog population is located in eastern Wyoming. There is little to no cultivation, but rather undisturbed rangelands housing hundreds of acres of black-tailed prairie dog colonies. We strongly discourage the listing of the black-tailed prairie dog, especially within the state boundaries of Wyoming. As a state with vast amounts of open space, it is not our farmers and ranchers' responsibility to individually write a Candidate Conservation Agreement with Assurances or Safe Harbor Agreement to keep their operations safe, should the Service decide to list the prairie dog.

The Wyoming Game and Fish Department (WGFD) works cooperatively with the Service to map prairie dog colonies in Wyoming for the hope to reintroduce black-footed ferrets. Many

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colonies' populations fluctuate due to predation and disease infestations including Bubonic Plague. This fluctuation is simply out of the hands of landowners. A preventative treatment for plague or other diseases must be positively proven and economically administrable to reduce colony die-offs.

We encourage the Service work closely with the WGFD for maps of colonies, proposed ferret transplants, disease mapping or other means to estimate Wyoming's black-tailed prairie dog populations before listing. We will continue to support and work in cooperation with the WGFD, but will not support the listing of the black-tailed prairie dog.

The WDA thanks the Service for accepting comments through the South Dakota Field Office. We will continue to track the efforts within our state regarding the black-tailed prairie dog and would appreciate receiving any and all information in the future regarding this species.

Sincerely,

A handwritten signature in blue ink that reads "John Etchepare 3/11/09". The signature is written in a cursive style.

John Etchepare
Director

JE/jw

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
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