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Thank you for the opportunity to review and comment on the **Environmental Assessment For Predator Damage and Conflict Management In Wyoming**. As livestock producers in Sublette County, we are directly affected users of the Wildlife Services (WS) program, and would like to go on record in support of Alternative 1. We support this alternative because it provides us with both information and direct action when it comes to predator damage management – whether it's nonlethal or lethal control.

We specifically oppose the other four alternatives:

Alternative 2 – discontinuation of WS involvement. This alternative would result in additional livestock losses and additional conflicts with predators, without producers being able to rely on professional services currently provided by WS.

Alternatives 3 and 4 –both of which would rely entirely on nonlethal methods. As with Alternative 2, these alternatives would result in added conflicts and death of livestock. It is a reality that ALL nonlethal methods of predator control will fail at some point in time. It is also a reality that when a predator repeatedly preys on livestock, often the only way to stop that repeated action is to eliminate – through lethal control – the problem predator. Alternative 5, which would require producers to show evidence of “sustained and ongoing use” of nonlethal control before WS could use lethal control would provide for burdensome paperwork with no actual benefit. Many, if not most, livestock producers practice numerous methods of nonlethal control before calling for assistance from Wildlife Services. This alternative is not viable because it would cause further delay in needed action, and the loss of additional animals, while creating unneeded paperwork.

Alternatives 2 and 3 are flawed in another way, that of assuming that predator conflicts would be resolved without WS. Our highest livestock losses were the result of repeated depredations by individual predators that have incredible stealth in evading capture/control efforts by highly trained specialists, and we would dread facing the challenge posed by these animals without the assistance of WS. To assume that individual producers could simply replace these services by doing the work themselves, or hiring someone else, ignores the skills, knowledge, and training of WS specialists.

Nonlethal

Since Alternatives 3, 4 and 5 all pertain to nonlethal measures, we want to address this issue specifically: Nonlethal control does not eliminate the need for lethal control, since all nonlethal methods can and will fail.

We offer our own operation as an example. Dependent on the season and location, we utilize a total of 13 nonlethal techniques, including fencing, pasture rotation, carrion removal, guardian dogs, guardian burros, taking weak animals out of the herd/culling, frequent human presence/herding, employ noise-makers, employ cameras/flash devices, shoot at/harass predators that approach, remove attractants from pastures, use multi-species grazing, and change bedding sites.

Despite all these efforts that we practice on our own, we still rely on the skilled professionals of WS. Although we live in a predator-rich environment, we are able to keep our livestock losses low, in large part due to our partnership with Wildlife Services. We have found that skilled WS animal damage specialists are able to identify and track individual problem predators and eliminate those animals that are causing our problems – something we are not trained or equipped to do. This targeted removal is an important part of keeping our losses to a minimum.

Misc.

Most of our conflicts are the result of interactions with wild mammalian predators (including those under federal protection) in our livestock, but we use WS for other conflict situations as well, including the use of DRC-1339 for depredating ravens, and we've also helped to alleviate damage situations involving avian predators such as eagles. There really isn't another entity or agency equipped to handle conflicts with these federally protected mammals and birds.

Direct Threats

Section 1.2.3.1 (page 27) addresses direct threats posed by wildlife, and mentions human injury caused by black bears, but fails to mention human injuries caused by grizzly bears in Wyoming, which has increased substantially in the last two decades – including both human injuries and fatalities.

Livestock Guardians

Appendix C, page 251, discusses livestock guardian dogs and adds, “Also, guard dogs often harass and kill non-target wildlife.” We take issue with this statement, and would suggest it be reworded to guard dogs “may” harass/kill non-target wildlife. We have worked for decades to improve producer management practices involving guardian dogs and feel the original statement is exaggerated and could be taken out of context.

Partnership

One important aspect of the livestock producer relationship with WS is the fact that it is a two-way relationship. We don't just receive information and services from the agency – the information sharing goes both ways. Producers like ourselves share information and field situations with WS personnel, and that information leads to new conflict resolution techniques or fields of inquiry. Our ranch's work with guardian dogs is an example. Because of our increased conflicts with wolves, we began researching the use of larger guardian dog breeds that may be better suited to protecting livestock in regions inhabited by wolves. WS took heed of our recommendations and have been field-testing effectiveness of these breeds. This partnership between producers and WS specialists is what leads to advances in our knowledge and ability to reduce conflicts with predators.

Outside of Alternative 1, the other alternatives are not economically viable, are not feasible in field conditions, and would result in additional livestock losses and animal suffering. Alternative 1 is the most reasonable alternative, since it leaves all the tools in our predator damage management toolbox. For our ranch, we don't believe we would be

able to remain in the livestock business in Wyoming without the work of Wildlife Services.

Sincerely,
s/James Urbigkit
s/Cat Urbigkit