



WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4699

Web site: <http://gf.state.wy.us>

GOVERNOR
MATTHEW H. MEAD

DIRECTOR
SCOTT TALBOTT

COMMISSIONERS
FRED LINDZEY – President
AARON CLARK – Vice President
MIKE HEALY
RICHARD KLOUDA
T. CARRIE LITTLE
ED MIGNERY
CHARLES PRICE

January 4, 2012

WER 12469
United States Fish and Wildlife Service
Proposed Information Collection;
Policy for Evaluation of Conservation
Efforts When Making Listing Decisions
FWS-R9-ES-2011-N236;
FF09E50000-FXES11170900000-B3

Service Information Collection Clearance Officer
Fish and Wildlife Service
MS 2042-PDM
4401 N. Fairfax Drive
Arlington, VA 22203

Dear Sir/Madam:

The staff of the Wyoming Game and Fish Department has reviewed the Proposed Information Collection; Policy for Evaluation of Conservation Efforts (PECE) When Making Listing Decisions. We offer the following comments for your consideration.

Finding the most recent PECE was difficult. We would suggest that you provide a link to the most recent version for future review.

- Whether or not the collection of information is necessary, including whether or not the information will have practical utility.

The collection of information is certainly necessary. As to the practicality, this ultimately is the Service's determination in relation to listing decisions and judicial review. We recommend though that this policy be vetted with NGO's, states and federal agencies so that when conservation efforts are being developed for species that may be petitioned to be listed, the groups developing the conservation efforts understand the evaluation bar that must be met for consideration.

- The accuracy of our estimate of the burden for this collection of information.

We agree that the current OMB estimation that the policy will not have a \$100 million annual effect or adversely affect an economic sector, productivity, jobs, the environment, or other units of government in the collection of data. However, the implementation of conservation efforts measures associated with the listing will certainly meet both the monetary bar and the adverse impacts bar.

- Ways to enhance the quality, utility, and clarity of the information to be collected.

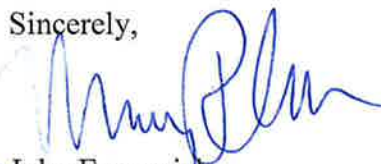

Again, this policy is not well distributed nor understood. Better dissemination and explanation of the policy would bolster the quality, utility and clarity of the information.

- Ways to minimize the burden of the collection of information on respondents.

It is in Wyoming's interest to have conservation programs be successful and to allow activities that have and will occur across the landscape continue. The WGFD does not mind providing this information provided we know that the Service will be acting in good faith to advance the conservation program to an approved state.

Thank you for the opportunity to comment. If you have any questions or concerns, please contact Mary Flanderka, Habitat Protection Supervisor, 307-777-4587.

Sincerely,


 John Emmerich
Deputy Director

JE/mf/gb