



## WYOMING GAME AND FISH DEPARTMENT

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January 7, 2020

WER 9436.07b  
U.S. Forest Service  
Thunder Basin National Grassland 2020 Plan Amendment  
Draft Environmental Impact Statement  
Campbell, Converse, Crook, Niobrara, and Weston Counties

Monique Nelson  
U.S. Forest Service  
2468 Jackson Street  
Laramie, WY 82070

Dear Ms. Nelson,

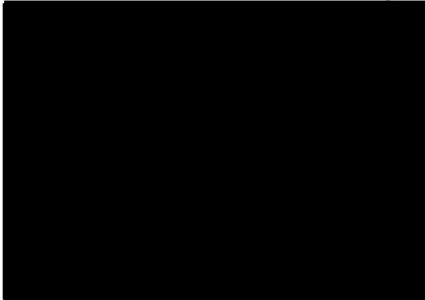
The staff of the Wyoming Game and Fish Department (Department) has reviewed the proposed Thunder Basin National Grassland (TBNG) 2020 Plan Amendment - Draft Environmental Impact Statement (DEIS). The Department appreciates the opportunity to participate on the Forest Service interdisciplinary team and as a cooperating agency throughout this amendment process.

The Department acknowledges the need to provide information in the DEIS pertaining to black-footed ferrets given public comments received during the scoping period. However, we would emphasize that one purpose of the proposed Land Use Plan amendment is to remove ferrets as a driver of management in the current Management Area 3.63 - Black-Footed Ferret Reintroduction Habitat. The current management is a single wildlife species-based framework, while the proposed focus for Management Area 3.67 - Rangelands with Short-Stature Vegetation Emphasis is a multi-species, habitat-based framework, which we find to be better aligned with the Forest Service mission. Wildlife management in Wyoming is the statutory charge of the Department, and we operate in close coordination with the U.S. Fish and Wildlife Service on matters pertaining to species listed as threatened or endangered under the Endangered Species Act, such as the black-footed ferret.

The alternatives in the proposed Land Use Plan amendment contain a good range of concepts, targets, and tools for managing prairie dogs within the planning area. Appendix B contains several concepts that could be developed further to support opportunities for adaptively managing prairie dogs on the TBNG. Our comments regarding specific aspects of the DEIS are organized in the attached comment table.

Monique Nelson  
January 7, 2020  
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Thank you for the opportunity to comment. The Department looks forward to continuing to participate in this Land Use Plan amendment process. If you have any questions or concerns please contact Amanda Withroder, Habitat Protection Program Supervisor, at (307) 777-4587.



AB/aw/ap

Enclosure(s)

1) Thunder Basin National Grassland 2020 Plan Amendment DEIS Comment Table

cc: U.S. Fish and Wildlife Service  
Joe Budd, Office of Governor Gordon  
Justin Binfet, Wyoming Game and Fish Department  
Dan Thiele, Wyoming Game and Fish Department  
Zack Walker, Wyoming Game and Fish Department  
Chris Wichmann, Wyoming Department of Agriculture

Thunder Basin National Grassland (TBNG) 2020 Plan Amendment Draft Environmental Impact Statement (DEIS) Comment Table				
Chapter	Page #	Section	Text	Comment/Suggestion
1	5	Black-Tailed Prairie Dogs on the Thunder Basin National Grassland	When analyzing the ecological sustainability, diversity of plant and animal communities, and ecosystem services within the plan area specific to the proposed plan amendment, prairie dogs and the habitat they provide are critical considerations.	When analyzing the ecological sustainability, diversity of plant and animal communities, and ecosystem services within the plan area specific to the proposed plan amendment, prairie dogs and the habitat they provide, <b>as well as their impacts on the landscape</b> are critical considerations.
1	9	Black-Footed Ferret Reintroduction on the Thunder Basin National Grassland	In this rule, U.S. Fish and Wildlife Service personnel also passed leadership of ferret reintroduction to the Wyoming Game and Fish Department.	<p>Although black-footed ferrets were listed as endangered in 1967 and the statewide 10(j) rule for black-footed ferrets in Wyoming was only recently issued by the U.S. Fish and Wildlife Service in 2015, we would note that the Department has played a lead role in managing black-footed ferrets in Wyoming since their rediscovery outside of Meeteetse in 1981. Notably, the Department led the captive breeding program for this species from 1985 to 1995 at our Sybille Wildlife Research Unit until transitioning the breeding program over to the U.S. Fish and Wildlife Service. Additionally, the Department has led reintroduction efforts in the Shirley Basin and in Meeteetse for nearly three decades. The Department finalized a Black-Footed Ferret Management Plan for Wyoming in 2018, and also leads the Black-Footed Ferret Working Group, a multi-stakeholder group that collaboratively evaluates reintroduction sites. It was only in 2018 that the U.S. Fish and Wildlife Service and the Department signed a memorandum of understanding (MOU) that formally designates the Department as the lead agency for ferret reintroductions in Wyoming, but the Department has led efforts to conserve black-footed ferrets in Wyoming for nearly 40 years.</p> <p>We feel the DEIS underrepresents this effort and mischaracterizes the management of black-footed ferrets as having been led by the U.S. Fish and Wildlife Service up until the 2018 MOU was signed. If such a broad amount of information pertaining to black-footed ferrets is necessary to include in the DEIS, we recommend ensuring clarity on the role the State has played and will continue to play in ferret management and recovery.</p>
1	9	Black-Footed Ferret Reintroduction on the Thunder Basin National Grassland	Maintain a minimum of 341 breeding adults distributed among 5 or more populations statewide.	The DEIS describes the recovery criteria outlined in the Black-Footed Ferret Management Plan, which are directly tied to recovery goals in the 2013 U.S. Fish and Wildlife Service range-wide recovery plan. We would emphasize that any reintroduction in Wyoming, regardless of the size of reintroduction site or the number breeding adults established, will contribute to the State's overarching goal of 341 breeding adults and 70,000 acres of occupied habitat.
1	9	Black-Footed Ferret Reintroduction on the Thunder Basin National Grassland	Prairie dog colonies are present across the state of Wyoming, and Wyoming Game and Fish Department personnel have developed a strategy to evaluate and prioritize among potential sites to best allocate efforts to meet recovery goals for the state.	Suggest noting that site prioritization is done in conjunction with the Black-Footed Ferret Working Group, using a collaboratively developed matrix. The Black-Footed Ferret Working Group consists of the following entities: The Wyoming Game and Fish Department, U.S. Fish and Wildlife Service, U.S. Department of Agriculture-Wildlife Services, Bureau of Land Management, U.S. Forest Service, Natural Resources Conservation Service, Wyoming Department of Agriculture, Defenders of Wildlife, Friends of Ferrets, Thunder Basin Grasslands Prairie Ecosystem Association, Wyoming Association of Conservation Districts, Wyoming Office of State Lands and Investments, Wyoming Weed and Pest Council.
1	10	Black-Footed Ferret Reintroduction on the Thunder Basin National Grassland	Barriers to reintroduction on the Thunder Basin National Grassland in the past have included cycles of sylvatic plague, which decrease the population and extent of prairie dog colonies; lack of prairie dog control including boundary control during colony expansions; and lack of acceptance of prairie dogs or reintroduction of black-footed ferrets by adjacent landowners and local communities.	Barriers to reintroduction on the Thunder Basin National Grassland in the past have included cycles of sylvatic plague, which decrease the population and extent of prairie dog colonies; lack of prairie dog control including boundary control during colony expansions; and lack of acceptance of prairie dogs or reintroduction of black-footed ferrets by adjacent landowners and local communities. <b>No reintroduction efforts have occurred on the Thunder Basin National Grassland, and at this time, none are being planned.</b>
2	33	Alternative 2 - Proposed Action	Thresholds for Rodenticide Use - Use in boundary management zones	The Department is supportive of establishing and maintaining boundary management zones to alleviate issues with Forest Service-based colonies from expanding onto to State and private lands where they are not desired. Understanding that resources to treat prairie dogs on an annual basis are limited, we recommend the Forest Service further consider how to address persistent problem colonies in a more holistic manner in order to maximize use of limited resources.



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2	35	Alternative 3 - Grassland-wide	Management Area 3.63 and the Cheyenne River Special Interest Area - The Cheyenne River Zoological Special Interest Area would be drawn to follow the Cheyenne River along the southeast border of management area 3.67 and Antelope Creek along the southwest border of management area 3.67.	The Department supports reconfiguring the Cheyenne River Special Interest Area (SIA) as is suggested in Alternatives 3. Additionally, we support the change in management emphasis to reflect riparian habitat values. The Department supports the inclusion of Antelope Creek in the SIA, as this area contains some of the best cottonwood galleries on the TBNG. If Antelope Creek is not included in the SIA, we recommend it is excluded from Management Area 3.67 in some other manner as it should not be managed for short-stature vegetation.
2	38	Alternative 3 - Grassland-wide	Prairie Dog Colony Acre Targets and Distribution - At least one complex of at least 1,500 acres of prairie dog colonies would be maintained in management area 3.67.	The Department does not support including explicit complex management targets that are tied to the reintroduction of black-footed ferrets as is described in Alternatives 3 and 4. One goal of this amendment process is to remove black-footed ferrets as a driver of management in Management Area 3.63. Notably, prairie dog colonies at ferret reintroduction sites in Wyoming have not been managed in this manner, and given that there are no reintroduction sites planned on the TBNG, this type of intensive management would likely unnecessarily divert resources needed for successful boundary management activities.
2	38	Alternative 3 - Grassland-wide	Prairie Dog Colony Acre Targets and Distribution - To optimize habitat heterogeneity for mountain plover, prairie dog colonies would be managed to vary in size up to approximately 1,000 acres with an emphasis on colonies of 200 to 500 acres.	Alternative 3 (Grassland-wide) considers managing the size of individual prairie dog colonies to optimize habitat for mountain plover. While the Department supports managing for a suite of species associated with prairie dog colonies, we are concerned that this level of intensive colony management may be economically prohibitive, and may take needed resources away from boundary management zones. Unbalanced, single-species management is one reason the Forest Service is undertaking a Land Use Plan amendment at this time. We recommend instead focusing on a highly functioning and dynamic ecosystem, with healthy rangelands and balanced resource uses.
2	42	Alternative 4 - Prairie Dog Emphasis	Prairie Dog Colony Acre Targets and Distribution - To develop prairie dog colony complexes, management would emphasize connectivity of colonies where possible by maintaining colonies within 4.5 miles of one another. At a minimum, two complexes of at least 4,500 acres would be developed or maintained in management area 3.67.	The Department does not support including explicit complex management targets that are tied to the reintroduction of black-footed ferrets as is described in Alternatives 3 and 4. One goal of this amendment process is to remove black-footed ferrets as a driver of management in Management Area 3.63. Notably, prairie dog colonies at ferret reintroduction sites in Wyoming have not been managed in this manner, and given that there are no reintroduction sites planned on the TBNG, this type of intensive management would likely unnecessarily divert resources needed for successful boundary management activities.
3	108-111	Analysis of Wildlife Resources	Effects Summary - Brewer's sparrow, Burrowing owl, Chestnut-collared longspur, Ferruginous hawk, Grasshopper sparrow, Greater sage-grouse, Long-billed curlew, McCown's longspur, Mountain plover, Northern harrier, Sagebrush sparrow, Black-tailed prairie dog, Swift fox - May adversely impact individuals but not likely to result in loss of viability in the planning area, nor cause a trend toward Federal listing; No substantial adverse impacts or substantially lessened protections as a result of the plan amendment.	The Department generally agrees with the analysis conclusions that proposed management actions in the alternatives may affect species on the grasslands in different ways, but is not likely to impact species at a population level.
3	111	Methodology	Considerations for Determination of Effects - Under 36 CFR 219.9(b)(1), the responsible official must determine whether the plan components required by 36 CFR 219.9(a) provide the ecological conditions necessary to "contribute to the recovery of federally listed threatened and endangered species..."	It is stated several times in the DEIS that the Forest Service must be attentive to the issue of black-footed ferrets as a result of Code of Federal Regulation (CFR) requirements, and due to the species' dependency on prairie dogs (black-tailed prairie dog management being the focus of this amendment). It is worth noting that CFR requirements suggest that plan components should be evaluated as to whether or not they contribute to a listed species recovery, not that the plan components must explicitly support a listed species recovery. From an ecological standpoint, the TBNG historically has supported prairie dog colony associated species throughout various ecological cycles influenced by climate, sylvatic plague, and myriad land management actions.
3	113	Table 26	Black-footed ferret - Species will be carried forward for analysis due to dependency on prairie dogs, even though the species does not occur on the planning unit.	The DEIS indicates black-footed ferrets are carried forth in the impacts analysis due to dependency on prairie dogs, and then acknowledges that black-footed ferrets do not exist on the TBNG. We agree and emphasize that black-footed ferrets are not known to exist on the TBNG, and no reintroductions are planned for this area. Therefore, it is unclear why black-footed ferrets are not removed at this point from the analysis, similar to other threatened or endangered species that do not exist on the TBNG. In fact, more attention is given to black-footed ferret impact analysis, than is given to the Northern long-eared bat, a threatened species that is known to exist on the TBNG.

Thunder Basin National Grassland (TBNG) 2020 Plan Amendment Draft Environmental Impact Statement (DEIS) Comment Table				
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3	114	Black-Footed Ferret	Alternatives were designed to meet the purpose and need for the project including to not preclude reintroduction of the black-footed ferret.	The DEIS accurately describes the multi-faceted social barriers to black-footed ferret reintroduction on the Thunder Basin National Grasslands (TBNG). From an ecological standpoint, the TBNG historically has and likely will continue to provide adequate habitat for a suite of grassland obligate, sagebrush obligate, and prairie dog colony associated species. As long as plan components contained in the alternatives continue to allow for the dynamics of the ecosystem to occur while balancing other uses, there should be little concern that the TBNG will not provide the ecological conditions necessary for all associated species.
3	114	Black-Footed Ferret	This prioritization matrix allows members to evaluate a number of different criteria related to the biological and social context for reintroduction in order to prioritize new areas for reintroduction.	The DEIS should more clearly describe the site prioritization process. Reintroduction sites are collaboratively evaluated by the Black-Footed Ferret Working Group (multi-stakeholder group described above). To date, the Shirley Basin and Meeteetse areas are the only established reintroduction areas where sites have met the requirements outlined in the prioritization matrix. Neither the Department nor the Black-Footed Ferret Working Group considers sites for ferret reintroduction that do not meet these requirements.
3	115	Alternative 3 - Grassland-wide Alternative	Use of anticoagulants in the boundary management zone would make the site a low priority for allocation of ferrets.	The description of Alternative 3 (Grassland-wide) indicates the use of anticoagulants within the boundary management zones would make these sites a low priority for allocation of ferrets. Generally speaking, boundary management zones would not be suitable places for black-footed ferret reintroduction given that the expectation is that these areas would be continually managed to be free of prairie dogs. Additionally, the Department does not determine how captive breeding centers allocate ferrets; however, the Black-Footed Ferret Working Group site prioritization matrix focuses on black-footed ferret <i>availability</i> , which is dependent upon breeding success and nationally received requests for ferrets. Importantly, the site prioritization matrix requires resources for boundary control to be in place, as well as landowner and community support for ferrets.
Appendix B	B-1	Collaborative Stakeholder Group (all alternatives)	Section	The Department supports the continuation of the Thunder Basin Collaborative Stakeholder Group as a consultative body to the Forest Service to help develop and adapt management actions in relation to prairie dog conservation and control on the TBNG.
Appendix B	B-2	Sylvatic Plague Management (all alternatives)	A more detailed strategy for the prioritization of plague control and choice of plague control tools based on input from the collaborative stakeholder group may be developed subsequent to and independent of the proposed plan amendment.	The Department supports the development of a plague management strategy for the TBNG. Plague is an inevitable part of prairie dog colony dynamics across Wyoming and, as noted in the DEIS, its outbreak and movement across the landscape is not well understood. In order to use plague control tools effectively, the Department recommends the development of a management area or landscape-focused strategy that helps to determine when, where, and how to apply plague control across the TBNG.
Appendix B	B-3	Prairie Dog Density Control (Proposed Action and Grassland-wide Alternatives Only)	Section	The Department appreciates the challenges associated with exploring new methods to adaptively manage prairie dogs on the grasslands. We recommend the Forest Service work with the Thunder Basin Collaborative Stakeholder group to implement one or more density control pilot projects on varying vegetation sites to develop more knowledge about this type of management technique. The Forest Service may consider delineating areas that are undesirable for prairie dog expansion to establish sideboards for where density control may be used effectively and appropriately. Control sites that are exposed to nearly identical outside variables should be established. In addition to vegetation objectives, we recommend evaluating changes in distribution/productivity of prairie dog colony associated species.
Appendix B	B-6	Satellite Prairie Dog Colonies (Proposed Action Only)	Section	The Department supports the concept of satellite colonies as a means to managing prairie dog colonies across the grasslands, and as a means to securing additional habitat for prairie dog colony associated species outside of Management Area 3.67. We support the designation of satellite colonies, as a component of the Proposed Action, in order to recognize (i.e., count) acres associated with colonies that persist on the landscape in a manner that meets multiple use needs. We recommend adequate management flexibility is built into this concept, including a mechanism for un-designating satellite colonies where appropriate, in order to avoid managing them in the same manner as the current "category" areas.