

January 9, 2020

Russell Bacon  
Forest Supervisor  
Thunder Basin National Grassland Supervisor's Office  
2468 Jackson St  
Laramie, WY 82070

*Re: Thunder Basin Plan Amendment Comments (EIS No. 20190250)*

Dear Supervisor Bacon:

Rocky Mountain Wild, a Colorado-based nonprofit organization, submits the following comments on behalf of our more than 7,000 members and supporters in the region. For more than 20 years our team of scientists, GIS analysts, and legal specialists have worked to understand and protect our native species, including prairie dogs, black-footed ferrets, and other grassland plants and animals. These comments are in response to the Thunder Basin National Grassland proposed management plan amendment and Draft Environmental Impact Statement.

After careful review of the Thunder Basin National Grassland (TBNG) proposed "2020 Plan Amendment," it is clear that the Forest Service should not adopt the Proposed Action or any of the alternatives without substantial revision. Any purported benefits to wildlife grazing are very much outweighed by the impact on black-tailed prairie dogs, which will in turn result in negative effects on the many species that rely on black-tailed prairie dogs for food, shelter, or grazing conditions, including the endangered black-footed ferret, the burrowing owl, and the mountain plover. The black-footed ferret is an endangered species whose viability remains tenuous, while the burrowing owl and mountain plover are both threatened throughout their ranges.

As an initial matter, Rocky Mountain Wild opposes the issuance of *any* Plan Amendment at this time. The Forest Service's first tenet is "Advocating a conservation ethic in promoting the health, productivity, diversity, and beauty of forests and associated lands" (see <https://www.fs.usda.gov/about-agency/what-we-believe>). Similarly, the Forest Service's first guiding principle is "We use an *ecological approach* to the multiple-use management of the National Forests and Grasslands (italics mine). While the Forest Service's multiple use vision arguably requires allowing grazing at TBNG, this use should not outweigh the mission of "promoting the health, productivity, diversity, and beauty of forests and associated lands." The existing Plan strikes an appropriate balance between the needs of ranchers and of wildlife, and does not require amendment. The Proposed Action and all of the proposed action alternatives (collectively, the "Actions") shift this balance in a way that threatens not only black-tailed prairie dog viability, but the viability of multiple species and, indeed, the entire grassland ecosystem at TBNG.

In particular, the Actions' elimination of the current prairie dog protected area (Management Area 3.63) will have a devastating effect on prairie dogs and a host of

species that rely on prairie dogs as prey, providers of shelter and/or maintainers of a healthy grassland habitat. Contrary to the TBNG Draft Environmental Impact Statement (the “DEIS”), the increased killing and persecution of prairie dogs will have a devastating effect on the species that rely on them, most notably the black-footed ferret. Once thought extinct, the black-footed ferret remains an endangered species under federal law, with a nationwide population so low (roughly 300) that their survival remains in doubt. Any suitable habitat (including keystone species like prairie dogs) for black-footed ferrets on federal land must be protected from unnecessary damage. The effect of the management approaches proposed in the Actions would be a massive reduction in prairie dog population that would disrupt the TBNG’s ecosystem and greatly limit its ability to support black-footed ferret survival. In fact, the Actions specifically authorize prairie dog killing in the TBNG’s only area designated as Black-footed Ferret Reintroduction Habitat (see MA 3.63). In addition, the populations of other species that rely on prairie dogs, such as burrowing owls and mountain plovers, will suffer from this massive reduction in prairie dog population.

All of the Actions would threaten prairie dogs and their dependent species in a number of ways: (1) damaging the Black-footed Ferret Reintroduction Habitat; (2) limiting prairie dog colony area; (3) reducing population and threatening viability through “density control” measures that likely include killing; (4) failing to implement measures to control sylvatic plague; (5) and adopting the Wyoming Game and Fish Department’s Black-footed Ferret Management Plan and granting Wyoming the authority to head any black-footed ferret reintroduction effort. Any of these changes to the Plan would damage TBNG’s ability to sustain black-footed ferrets and other prairie dog dependent species, but together they are all but certain to render TBNG incapable of sustaining these species. All of the Actions are in conflict with the regulation at 36 CFR 219.9(b)(1), which demands that any plan adopted by the Forest Service “provide the ecological conditions necessary to: “contribute to the recovery of federally listed threatened and endangered species, conserve proposed and candidate species, and maintain a viable population of each species of conservation concern within the plan area.” This requirement means that the effect of the Forest Service’s plan on the “ecological conditions” must actually *promote* recovery and conversation, not merely avoid completely eliminating any possibility of recovery. None of the Actions complies with this requirement, and thus the Plan Amendment does not provide the *reasonable range of alternatives* required by the regulations under the National Environmental Policy Act (32 CFR 775.3). The DEIS also fails to provide an adequate analysis of the cumulative effect of items 1 through 6 above.

In summary, all of the Actions proposed for the management plan amendment fail to comply with NEPA’s requirements to contribute the recovery of black-footed ferrets and to conserve other species of conservation concern; in fact, the Actions would have the opposite effect. The Forest Service should not amend the existing management plan; if the Forest Service does pursue an amendment, it must base it on more complete and sound impact analysis and remove any plan component that is not consistent with the requirement to contribute to the recovery of the black-footed ferret and maintain viable populations of other species of conservation concern within the plan area. Rocky

Mountain Wild therefore respectfully requests that the Forest Service not amend the management plan or, at minimum, ensure that any amendment is in full compliance with NEPA and its associated regulations.

Sincerely,

