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Mr. Bacon,

Thank you for the opportunity to comment on the draft Environmental Impact Statement (dEIS) for the Thunder Basin National Grassland (TBNG) regarding prairie dog management. As you are well aware, this is not a new issue, nor a simple one. I am very appreciative of your commitment to trying to find a way to balance the multiple interests on the TBNG and of your inclusion of the State at multiple levels on this project.

Overall, I believe the shift in emphasis from single-species management to a more holistic and habitat-based approach is more logical and has the potential to better align with the United States Forest Service's (USFS) legal authorities and mandates. The USFS should remain focused on providing habitat, forage for livestock, recreational opportunities, and other products. The existing alternatives within the dEIS seem intended to meet these goals but it does not appear any single alternative entirely captures this approach. There are portions of multiple alternatives that seem to move the USFS towards more sustainable management and there may be a logical blending of alternatives that is most prudent. I suggest the USFS consider how they could blend the Proposed Action with portions of the Grassland-wide Alternative.

Regardless of which alternative the USFS chooses to identify as a Preferred Alternative, one issue will continue to underlie implementation – funding. Funding has been an issue for TBNG in the past and it does not appear that will radically change. However, I am confident developing an alternative that can be adaptive and balance uses will lead to better cooperation and ultimately to more opportunities to leverage partnerships with private landowners, other agencies, and non-governmental organizations. This will have to include actual implementation of any plan that is put in place and a level of responsiveness from the USFS in situations, such as encroachment of prairie dogs onto private lands, that has not been consistent in the past. With this in mind, I fully support the development of a Collaborative Stakeholder Group as this may be the first step in improved relations with all parties and should help the USFS better understand challenges on the ground.

The other underlying issue will continue to be black-footed ferrets and the amount of emphasis placed on managing for their introduction. The Wyoming Game and Fish Department (WGFD) maintains a lead role in ferret introductions and has an inclusive process that considers multiple factors to inform appropriateness of any site. The USFS should follow WGFD's lead on any future ferret discussion.

I also appreciate the USFS analysis of prairie dogs potential impacts to forage and vegetation dynamics and believe it demonstrates the differences in potential impacts across alternatives. While I recognize this is very difficult to predict and manage, acknowledging the competition between prairie dogs and other grazers, including wildlife, is key to formulating a sound and sustainable management strategy for the future. However, additional information may be worthwhile when describing anticipated management based on vegetation dynamics.

State agencies will be providing more detailed comments pertaining to the proposed changes and their respective agency missions; I ask that you review and consider them carefully and work directly with the agencies whenever possible to rectify concerns or confusion. Additionally, many landowners and non-governmental groups have devoted time and resources to this issue, including work as a collaborative through the Wyoming County Commissioners Association. It is critical that this continue and the USFS remain involved with this group.

I thank you again for the opportunity to comment and look forward to working with you in the future. If there are any questions or concerns, please reach out to my staff.

