

INYAN KARA GRAZING ASSOCIATION
P. O. BOX 458
NEWCASTLE, WY 82701-0458

CASPER WY 826

07 JAN 2020 PM 2 T



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JAN 09 2020

Medicine Bow-Rout NFs
Medicine Bow-Rout NFs

Thunder Basin Plan Amendments Comments
Forest Supervisor's Office
2468 Jackson Street
Laramie, WY 82070

82070\$6535



Jim Darlington
162 Darlington Rd.
Newcastle, WY 82701

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Inyan Kara Grazing Association
P.O. Box 458
Newcastle, WY 82701

January 7, 2020

Thunder Basin Plan Amendments Comments
TBNG Forest Supervisor's Office
2468 Jackson Street
Laramie, WY 82070

Dear Comment Reviewers:

We would like to thank you for the opportunity to make the following comments on the 2020 TBNG Plan Amendment:

1. While we do applaud the proposal to be able to control p. dogs outside of the 3.67 area, we hope that there will be a simpler and more manageable plan produced by dropping all the other categories, and treating things the same across the Grasslands. That would lead us to favoring Alternative 3, with a few changes.

2. The 3.67 area is, of course, outside of the Inyan Kara Grazing Association boundaries, but we fear that excessive p. dogs in that area could migrate onto us. Numbers are down right now, thanks to the plague, but they will go back up.

3. We would be in favor of increasing the ¼ mile boundary management zone across the Grasslands to at least ½ mile, or better yet even, a full mile, as that is still a short distance for migrating prairie dogs.

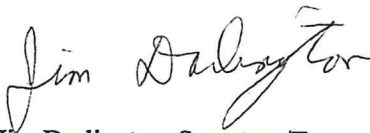
4. We would hope that any listing of species and potential species of concern are based on peer reviewed science, not questionable wish lists, as some of the species listed on handouts during the Working Group Meetings were very questionable (e.g. – spotted skunks, pocket gophers, 13. stripers and rattlesnakes).

5. Item #5 in the matrix listed on page 14 of the Wyoming Game & Fish Black Footed Ferret Recovery Plan requires a need for, "Stakeholder support of reintroduction activities, with particular emphasis on local communities and landowners, including adjacent landowners and permittees / lessees." We believe that unless, and until, you can demonstrate such support, the whole BFF Recovery area idea should be put on hold, or done away with completely. We can see a great deal for this support becoming possible, if the prairie dogs supporters were to put some of their vast amount of money where their mouths are, and purchase a ranch of their own on which they could raise all the dogs and ferrets as their private property rights would allow them. All State laws and regulations should be complied with!

6. We are strongly in favor of no restrictions on shooting of prairie dogs across the entire TBNG, as per Alternative 3. While shooting never has and never will eliminate a sizable dog colony, it should be considered as one of the density control and plague management tools. Plague is much less likely to come around again when dog numbers are maintained at a lower healthy level.

7. While we would ideally wish that the National Grasslands could be managed as intended during their creation, we would at least hope that Forest Service policy is not influenced too highly by fear of litigation from NGOs, who often use roadblock species, such as prairie dogs, to achieve their higher goals of control.

Thanks again for this opportunity to comment. Sincerely yours,

A handwritten signature in cursive script that reads "Jim Darlington". The signature is written in dark ink and is positioned above the printed name.

Jim Darlington, Secretary/Treasurer

Inyan Kara Grazing Association