



(submitted electronically)

July 14, 2020

Thunder Basin Plan Amendment Comments
Thunder Basin National Grassland Supervisors Office
2468 Jackson Street
Laramie, WY 82070

RE: 2020 Thunder Basin National Grasslands Plan Amendment Draft Record of Decision

Mr. Russ Bacon & Ms. Monique Nelson,

The Wyoming Farm Bureau Federation is commenting on behalf of over 2,600 agricultural producer members in the state of Wyoming. Many of our members have specific interest in how the Thunder Basin National Grasslands (TBNG) are managed and all our members are vested in the management of lands under the Forest Service (FS) umbrella. The current management scenario in TBNG of Management Area 3.63 (MA), the Black-footed Ferret Reintroduction Habitat, is both untenable and unsustainable. We appreciate the opportunity to comment on the Draft Record of Decision (DROD).

When looking for implementable solutions to improve the management of the TBNG we would encourage the FS to recall the foundational principles upon which the TBNG were established. Under the Bankhead-Jones Act these lands were established as a site for grasslands agriculture. Furthermore, the FS itself is nestled under the umbrella of the United States Department of Agriculture. Yet, this agricultural focus often seems lost to the demands of special interests. While we realize the FS is caught in a scenario where they must consider many interests, they should not forget their principal charge.

Overarching Comments

Socio-Economic Impacts

We are concerned by the lack of socio-economic impact analysis to date. We feel more emphasis should be placed on how these management scenarios and decisions will affect local economies and individual operations.



Control Methods

The Forest Service must be given more tools and funding for said tools if this Plan Amendment is to be successful. We support additional methods of lethal control being made available for use. We can only support non-lethal control methods being used if FS funds and personnel are not used to implement or maintain them. We want to be clear that our support is only for the allowance of these nonlethal projects to occur.

Shooting Ban

We do not support any kind of shooting ban or restriction. There is no evidence of shooting causing reductions in acres of prairie dogs. The use of lead bullets is already restricted to mitigate the risk of lead poisoning to other species.

Drought Reductions

We support reducing acreage goals during times of drought. However, density control may be another tool to reduce the burden to the landscape without having to reduce acreage.

Black Footed Ferrets

We are concerned with FS continued attempts to manage a species that is under a statewide 10(j). The remaining references to management provisions for Black Footed Ferrets need removed.

Density Control

We whole heartedly support density control and believe this can be used to reduce impacts to the landscape while still maintaining areas of short stature vegetation to meet FS management goals.

Stakeholder Group

We support a stakeholder group being formed and utilized to inform management decisions. We would recommend the groups and persons that have been heavily involved in the working group effort prior to this Plan Amendment should comprise the initial group. We cannot stress enough the importance of the inclusion and involvement of area landowners, who are both the most heavily impacted and often the most in tune with on the ground situations. As such, their interest should be more heavily weighted than that of other parties.

Cheyenne River Special Interest Area

We support changing both the focus of and the boundaries of the Cheyenne River Special Interest Area. We cannot and will not support any proposed reductions to grazing use or stocking numbers as a result of this change to a riparian focus.



Boundary Management Zones

We support the use of Boundary Management Zones (BMZ's). These should be a minimum of ½ mile and should be able to be increased up to one mile in areas that are problematic. Area 3.67 should have BMZ's permanently in place. Throughout the TBNG landowners should be able to request temporary BMZ's in problematic areas where encroachment onto adjacent Private and State lands is occurring or where damage is occurring to private or public facilities. All residences within the TBNG should have a minimum of a one mile BMZ permanently in place.

Acreage Goals

Shifting towards a rangeland focus better aligns with fulfilling the Forest Service's mission of managing lands; not species. All management goal references to "prairie dog colonies" or "acres of prairie dogs" should be changed to "acres of short stature vegetation" or similar habitat focused language. Acreages counted toward this goal should be based off of landscape and vegetative composition, not solely presence of prairie dogs. This supports a landscape scale approach that benefits multiple species and the landscape as a whole.

Designated Complex

IF there is a designated complex, it should be very carefully chosen with some of the following considerations: natural barriers, proximity to the Special Interest Area, proximity to non-federal lands, avoidance of known problematic areas, adjacency of residential buffers, ecological site descriptions, etc. Our recommendation would be that this complex may be best accepted if located within the rest pastures.

Size of Short Stature Vegetation Areas

We support managing for areas of short stature vegetation that are 200 – 500 acres in size. We feel this meets habitat goals for several species while reducing negative impacts to the landscape. Attention should still be given to density and the availability of forage and composition of plant species within these colonies.

Pasture Design

We appreciate the addition of language that allows for pasture size modification. This allows rangeland health to take priority over scenic values.

Livestock Management/Forage Allocations

The ability to utilize livestock timing, density, etc. to enhance desired conditions on the ground may currently be underutilized. FS should work with the grazing associations and landowners to identify opportunities. We believe an approach similar to the Bureau of Land Management's Outcome Based



Grazing might be well suited to this scenario. Rangeland health should drive management decisions.

Plague Management

We cannot support the FS allocating funds for plague mitigation such as dusting. Any such activities should only occur if funded from outside sources and only if less there are less than 5,000 acres across the TBNG.

Funding

We feel that the ultimate success of this Plan Amendment depends on adequate and consistent funding. The FS must do everything possible to allocate and prioritize funding to implement both proactive and reactive management strategies.

Detailed Analysis

We offer these proposed definition changes, ~~removals~~ and *additions* to be evaluated in the DROD:

Thresholds for rodenticide use (pg 15)

“...Other control activities would be prioritized annually *or as needed*.”

Drought plan (pg 16)

“...*Density control can also be used to reduce impacts to resources.*”

Plague Management (pg 16)

“...~~will be implemented annually~~ *can be implemented if acreage grasslands wide falls below 5,000 acres.*”

Dusting cannot and should not be implemented annually. In times of extreme expansion, the plague is the only truly effective mechanism of reduction. It should ONLY be mitigated in times of sever reductions.

Ch. 1, Goals and Objectives, Goal 4.b, Public and Organizational Relations, Objective 2 (pg 36)

“Objective: Meet annually *or as needed* with...”

Ch. 1, Standards and Guidelines, Physical Resources, B.2 (pg 36-37)

“...increased runoff (~~exceptions may occur in special habitat situations (e.g. prairie dog habitat)~~)”



Ch. 1, Standards and Guidelines, Biological Resources, F.18 (pg 37)

There are no Black Footed Ferrets on the grassland. Delete section.

Ch. 1, Standards and Guidelines, Biological Resources, F.19 (pg 37)

There are no Black Footed Ferrets on the grassland. Delete section.

Ch. 1, Standards and Guidelines, Biological Resources, F.20 (pg 37)

There are no Black Footed Ferrets on the grassland. Delete section.

Ch. 1, Standards and Guidelines, Biological Resources, F.22 (pg 37)

There are no Black Footed Ferrets on the grassland. Delete section.

Ch. 1, Standards and Guidelines, Biological Resources, F.28 (pg 38)

“...nesting mountain plover, ~~prohibit~~ *limit* the following...”

Ch. 1, Standards and Guidelines, Biological Resources, F.29 (pg 38)

“...activities should ~~not be authorized~~ *limited* in nesting plover...”

GPA-FW-FWRP-GL-02 (pg 39)

“...sylvatic plague *if there are less than 5,000 acres Grassland wide.*”

Ch. 1, Standards and Guidelines, Biological Resources, H.1 (pg 39)

“Outside of Management Area 3.67 ~~authorize~~ *prioritize* use of prairie dog control...”

The FS has not put forth a proposal to restrict management of prairie dogs outside of 3.67 at any point in this process until now. This changes the intent of the entire amendment. The FS MUST allow all management tools to continue to be used across the TBNG.

Ch. 1, Standards and Guidelines, Biological Resources, H.3 (pg 40)

“...official should ~~consider whether~~ *engage with* adjacent landowners ~~in~~ *on* concurrent control...”



Ch. 1, Standards and Guidelines, Administration, M.3 (pg 40-41)

WYFB Policy does not support the acquisition of lands by the federal government. The FS has shown an inability to adequately manage the ground it is currently responsible for. It is wholly inappropriate and irresponsible to attempt to acquire more lands. Delete section.

Ch. 2, Cellers Rosecrans GA, Desired Conditions, (pg 47)

“... will predominate, *prairie dogs will be largely absent* (see chapter 3....”

Ch. 2, Cellers Rosecrans GA, Standards and Guidelines, Wildlife, Black-tailed Prairie Dog, (MIS), 1 (pg 51)

The FS has shown an inability to adequately manage the ground it is currently responsible for. It is wholly inappropriate and irresponsible to attempt to acquire more lands. Delete section.

Ch. 3, MA 2.1, SIA Description, (pg 63-64)

Add: There will be no reduction in livestock AUMs due to this reclassification.

GPA-MA3.67-FWRP-O-07 (pg 65)

“...colonies *and implement density control measures.*”

GPA-MA3.67-FWRP-GL-14 (pg 67)

Delete: “~~Before expanding a boundary management zone, the responsible official should consider the total area of prairie dog colonies relative to the 10,000 acre objective for prairie dog colonies, impact to the species associated with prairie dog colonies, compliance with other plan components, site specific information, and concurrent treatment by the adjacent landowner.~~”

These exceptions were not brought forward at any point in the process up until now. The FS must stand by their commitment to protect private property from incursion. These caveats open the door for the FS to continue down the same path that created the current untenable situation that prompted this entire process.

GPA-MA3.67-FWRP-ST-17 (pg 68)

There is no evidence of shooting causing reductions in acres of prairie dogs. The use of lead bullets is already restricted to mitigate the risk of lead poisoning to other species.



GPA-MA3.67-FWRP-ST-18 (pg 68)

Dusting cannot and should not be implemented annually. In times of extreme expansion, the plague is the only truly effective mechanism of reduction. It should ONLY be mitigated in times of severe reductions.

Appendix D, Wildlife, Wildlife -- Timing Limitations (TL) (pg 68)

"Surface Use is ~~prohibited~~ *limited* from..."

Appendix D, Wildlife, Wildlife -- Timing Limitations (TL) (pg 69-)

There are no Black Footed Ferrets on the grassland. Delete section.

Appendix D, Wildlife, Wildlife -- Controlled Surface Use (CSU) (pg 70-71)

There are no Black Footed Ferrets on the grassland. Delete section.

In Conclusion

We feel that the incorporation of these suggestions and concepts can provide a potential path forward that will bring relief to adjacent landowners, lessees, and the rangeland itself. We would remind the FS of the leadership Secretary Perdue provided recently through his Secretarial Memo directions of increasing the productivity of the National Forests and Grasslands; and valuing the Nations grazing heritage and the National Grasslands. We appreciate the opportunity to provide comment.

Sincerely,

Holly L.M. Kennedy
Wyoming Farm Bureau Federation
Field Services & Federal Lands Associate

CC: NER; Board; Congressional Delegation; Governor's Office; WCCA; WDA; WACD