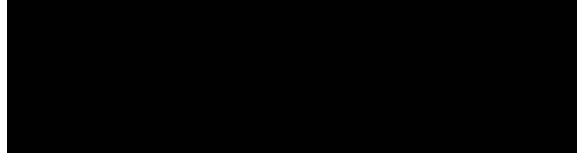


## ***CONVERSE COUNTY CONSERVATION DISTRICT***



January 9, 2020

Mr. Russ Bacon, Forest Supervisor  
Medicine Bow-Routt National Forests and Thunder Basin National Grasslands  
2468 W. Jackson Street  
Laramie, WY 82070

Dear Mr. Bacon,

Following are the Converse County Conservation District (CCCD) comments regarding the Thunder Basin National Grassland 2020 Plan Amendment – Draft Environmental Impact Statement (DEIS).

Our comments are specific to our mission: To provide leadership for the conservation of Converse County's soils and water, protect the agricultural resource base, promote the control of soil erosion, promote and protect the quality and quantity of water in Converse County and all other natural resources, preserve and enhance wildlife habitat, protect the tax base and promote the health, safety and general welfare of the county through a responsible conservation ethic.

In general, CCCD supports most components of Alternative 2 – Proposed Action. However, we would like to provide the following comments and suggested modifications which we feel strengthen the emphasis on habitat management and will provide for maximum benefit and flexibility needed for implementable management on the Thunder Basin National Grasslands.

- Remove language referencing satellite colonies throughout the Proposed Plan and Appendices. The time, manpower, and financial resources required to monitor satellite colonies are not feasible and could be better utilized for management within the boundaries of MA 3.67. Designation of satellite colonies outside of MA 3.67 would also create additional demands on boundary control to protect adjacent landowners.
- In Appendix A, page A-3, include the language “to optimize habitat heterogeneity for mountain plover, prairie dog colonies should vary in size up to approximately 1,000 acres with an emphasis on colonies of 200 to 500 acres. Guideline”
- CCCD encourages changing the “3” in Appendix A, Page A-9 H.XX to “2”.
- We support including anticoagulant rodenticides and fumigants in the list of allowable lethal control measures in the Proposed Action. “Fumigants and anticoagulant rodenticides may be used only in boundary management zones and only after **two** consecutive applications of zinc phosphide. Fumigants and anticoagulant rodenticides may be used only if applied by a Forest Service approved contractor (through direct contract or agreement) or Forest Service staff. If an area is chosen to be a black-footed

ferret reintroduction site, fumigants and anticoagulant rodenticides will not be used in that area. Standard.”

- Include the following language in Appendix A, Page A-10 H.XX – “Where persistent or imminent prairie dog colony encroachment occurs, a temporary 1-mile boundary zone may be used to prevent encroachment. Request will be considered by the Responsible Official in the context of acreage targets, compliance with other plan standards and guidelines and site-specific information. To ensure effective treatments, prairie dog control efforts by the Forest Service should be prioritized where the adjacent landowner engages in concurrent control efforts. Guideline”
- CCCD supports using Ecological Site Descriptions (ESD) as a reference tool for site potential when making management decisions focusing on Rangelands with Short-Stature Vegetation to maintain adequate plant cover to protect the watershed, maintain plant health consistent with the soil type and provide forage for livestock on suitable rangelands.
- With the Plan Amendment focusing on grassland vegetation on the Thunder Basin National Grassland, CCCD encourages language be included that allows the ability to install structural range improvements, i.e. cross fencing, to support the trend toward desired range conditions and improve pasture utilization.
- We suggest the Proposed Action has language added/changed in the following sections to the highlighted text: Appendix A, Page A-15 “Pastures will be large **unless prairie dog management considerations dictate otherwise.**”  
Appendix A, Page A-18 “The landscape is dominated by large pasture sizes, **except where prairie dog management considerations dictate otherwise**, 15 years from plan approval. Objective”  
Appendix A, Page A25 “The landscape is dominated by large pasture sizes, **except where prairie dog management considerations dictate otherwise**, 15 years from plan approval. Objective”
- Change “3/4” to **1 mile** in Appendix A, Page A-54, Fish and Wildlife, XX
- Change language in Appendix A, Page A-55 Fish and Wildlife, XX to: “Recreational prairie dog shooting **is allowed year-round**, except in MA 3.67 when prairie dog acres are below 7,500 acres. Standard”

#### General comments:

- Density control is another management tool that should be included throughout the Proposed Plan to provide prairie dog management flexibility and aid in trending toward desired vegetative conditions.
- The northern end of the proposed MA 3.67 overlaps the Thunder Basin Sage-Grouse Core Area. While sage-grouse and prairie dogs have historically co-existed, prairie dog management tools must be included in the Proposed Plan that can be used if prairie dogs are actively destroying sage-grouse habitat.
- CCCD fully supports the continuation of a Collaborative Stakeholder Group. We believe the Group should meet quarterly at a minimum. We would like to see more definition as to the composition of the group participants (i.e. including local governments) as well as the groups intended function.

Thank you for the opportunity to provide comments on the Thunder Basin National Grassland 2020 Plan Amendment – Draft Environmental Impact Statement. We remain committed to working cooperatively with the U. S. Forest Service on the management of the multiple resources and uses of the Thunder Basin National Grasslands.

Respectfully,

*Michelle Huntington*

Michelle Huntington  
District Manager

Cc: Wyoming Association of Conservation Districts  
Wyoming Department of Agriculture  
Converse County Commissioners  
Converse County Weed and Pest  
Campbell County Conservation District

**Converse County Conservation District  
Board of Supervisors**

Stan Mitchem   Shelly Falkenburg   Doug Horner   Susan Downs   Sharon Lovitt