

January 7, 2020

Thunder Basin Plan Amendment Comments
Thunder Basin National Grassland Supervisor's Office
2468 Jackson Street
Laramie, Wyoming 82070

RE: Draft Environmental Impact Statement for Prairie Dog and Black-footed Ferret Management

Hello,

Native Ecosystems Council (NEC) has only recently become aware of the agency's plans to change management of the Thunder Basin National Grasslands from promoting prairie dogs and black-footed ferrets to promoting livestock. At this time, we would like to request a "hard copy" of the draft environmental impact statement, as well as the proposed amendments for changing the management direction for these public lands. Due to the tight timeline for when we have learned about this project, we are unable to provide in depth comments at this time. However, we would like to voice our strong objections to reducing wildlife protections for the embattled prairie dog. This is an essential keystone species for a host of other wildlife. These prairie dogs provide essential prey for many raptors, as the ferruginous hawk, red-tailed hawk, and Swainson's hawk. Prairie dogs also feed countless numbers of badgers, foxes, coyotes, weasels, and of course, the black-footed ferret. Prairie dog burrows are essential for other species that use them for nesting (burrowing owls to cottontail rabbits). These burrows are also important for many reptiles and amphibians. On the other hand, promoting livestock grazing is a massive subsidy to the private ranching industry, without any benefits to the public. If anything, there needs to be an alternative that eliminates livestock grazing from most or all portions of these grasslands. This would benefit species that

require relatively high levels of vegetative cover, including many voles, and the sharp-tailed grouse. In turn, the fences required to manage livestock are a significant hazard to many birds due to mortality from fence strikes, or entanglement on the barbs of the fences. It is unclear if these adverse impacts of fences to both nongame wildlife and big game species, including antelope, have been fully evaluated in the DEIS. The impact of fences on wildlife are massive, and these impacts are rarely acknowledged by government agencies.

In addition to all these adverse impacts on wildlife, the livestock grazing programs promote control of prairie dogs and other wildlife to reduce competition for forage and predation mortality to cattle and sheep. This adds yet another cost to these subsidized grazing programs.

Although we have not read through the DEIS, to determine if there is an alternative that reduces or eliminates livestock grazing in important areas for prairie dogs and ferrets, or any alternative that reduces existing impacts to wildlife from the grazing program, including fences, we believe this type of progressive management is essential based on the current science for management of these prairie ecosystems. We are not aware of any science that shows that wildlife will benefit from livestock grazing, fences, predator control, and the control of prairie dogs. We do know that there is a strong public concern about the long-standing practice of controlling prairie dogs, and that any proposed amendments to the management plans for these public lands requires alternatives that address these public concerns. This requires an action alternative that increases, rather than decreases, prairie dog populations.

We also believe that the proposed alternatives all require complete economic analyses of the total costs for grazing, along with a reasonable measure of the costs to wildlife. Without this information, the general public is not being provided with any basis for the agency's rationale to promote livestock grazing over wildlife. Net public benefits need to be defined based on the expected population levels of wildlife per alternative, along with the expected costs for grazing programs. Unless this information is being provided, the agency is not providing the high-quality information to the public that is required by the National Environmental Protection Act (NEPA).

In conclusion, it is difficult to understand why reducing prairie dogs and the vast web of wildlife that they support meets the requirements of the National Forest Management Act (NFMA) to provide for a diversity of wildlife on public lands. The distribution and density of prairie dog towns on these grasslands is an excellent measure of wildlife diversity. Removing and reducing prairie dog towns or their extent is a direct action to reduce wildlife diversity. It is unclear what measure the agency has used to determine what level of wildlife diversity is going to be provided on these grasslands, or how these proposals meet the requirements of the NFMA.

Please provide Native Ecosystems Council a hard copy of the amendment DEIS, along with associated appendices. This will ensure that we have a more complete understanding of this proposal to increase livestock management over wildlife on these public lands, when a final decision is completed by the agency.

Regards,

Sara Johnson, Director
Native Ecosystems Council

