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RE: Little Missouri National Grassland (LMNG) Prairie Dog Management Proposed Action, Notice of Scoping, September 3, 2015

Comments Submitted Via Email: Shannon Boehm, comments-northern-dakota-prairie-medora@fs.fed.us

Dear Ranger Boehm:

This letter constitutes the comments representing the 1.2 million members and supporters of Defenders of Wildlife ("Defenders") in the United States regarding your request for comments on the proposed action to implement prairie dog management aspects of the 2002 Dakota Prairie Grasslands Land Resource Management Plan. Defenders has commented previously on prairie dog management in the Medora and McKenzie Ranger District of the LMNG (see, e.g., our letter to you dated August 14, 2006 (Appendix 1), and our Appeal, dated July 8, 2008, which we incorporate by reference here. Defenders is a member of the US Fish and Wildlife Service Black-Footed Ferret Recovery Implementation Team, and has engaged various administrative units of the National Grassland system in cooperative management projects directed toward prairie dog conservation for the past two decades.

Ecological Background

As we noted to you in our previous comments, the black-tailed prairie dog is a keystone species of the Great Plains (Appendix B, Letter from Defenders to LMNG dated August 14, 2006, attached as Appendix 1). Their colonies provide habitat for a range of other species. Nine prairie wildlife species are prairie dog obligates—dependent on these keystone rodents (Kotliar et al. 1999). Black-tailed prairie dog populations have declined by 98-99 percent throughout their range (65 Federal Register 5476-5488). The Little Missouri National Grassland provides important habitat for prairie dogs and their associated species.

Black-tailed prairie dogs once were found across the Great Plains from northern Chihuahua, Mexico to southern Saskatchewan, Canada. They occupied 40-80 million acres of this region, living in colonies that were often tens of miles long. Whereas they once covered 10-20 percent of this 400

million acre region, today they occupy much less than one percent. As a result, numerous other species that benefit from prairie dogs have also experienced a tremendous crash in population. Western North Dakota once contained very large complexes of prairie dog colonies. For example, a distance of approximately 53 km between present-day Belfield and Amadon appeared to have contained extensive prairie dog colonies (Knowles et al. 2003). Some of this area is upland prairie within the Little Missouri National Grassland.

Today prairie dogs are largely extirpated from North Dakota. Based on the most current information available, within the Little Missouri population, the Forest Service manages 37% of the remaining prairie dogs in North Dakota (Knowles 2003). This acreage is minimal but even more critical for the ecological services provided by prairie dogs due to this fact. At 5,200 acres of small scattered colonies, prairie dogs occupy 0.5% of the Little Missouri National Grassland (Scoping notice at p. 3).

The black-footed ferret is one of the most endangered mammals in North America. The ferret's historic range includes the Little Missouri National Grassland area. The ferret is believed to be extirpated from North Dakota. The LRMP calls for prairie dog increases and ferret recovery in the 3.63 Management Area located on the McKenzie Ranger District.

The dramatic decline of the black-footed ferret is due primarily to the loss of the ferret's main food source, prairie dogs. Prairie dogs make up over 90 percent of the ferret diet. Black-footed ferrets rely on prairie dog burrows for breeding dens and refugia; they cannot survive without this keystone rodent (Miller et al. 1996). Black-tailed prairie dog colonies, however, have declined by more than 98 percent within their former range. Even more detrimental for the ferret, the small, scattered colonies that are the norm today are likely insufficient for long-term persistence of ferrets. While ferrets require very large complexes of prairie dog colonies to be sustained over the long term, these once common large (>10,000 acres) complexes are almost entirely gone from the Plains. The U.S. Fish and Wildlife Service now accepts reintroduction proposals for much smaller acreages (1,500 ac minimums) due to the lack of suitable habitat, but it remains to be seen whether these smaller acreages will be able to sustain ferret populations, even with augmentation, over the long term. Therefore, larger acreages are encouraged and management that leads to expansion of prairie dogs to maximum extent feasible is needed.

Ferret survival is dependent on the success of reintroduction programs. The success of ferret reintroduction programs is in turn dependent on conservation and restoration of at least ten large prairie dog complexes. To down list the ferret from "endangered" to "threatened" the U.S. Fish and Wildlife Service's Black-footed Ferret Recovery plan calls for establishing ten self-sustaining sites of black-footed ferrets, a goal it is far from accomplishing.

There is a significant public interest in returning this species to all representative regions of its historic range. No site in North Dakota has yet attempted a black-footed ferret reintroduction. It will be absolutely essential to protect prairie dog colonies on LMNGfor there to be any hope of re-establishing black-footed ferret populations in North Dakota. Loss of prairie dog habitat, through excessive boundary control or lack of adequate management targets, is unacceptable.

In order to help meet the absolute minimum requirements for future black-footed ferret down-listing, the Multi-state Conservation Plan for the Black-tailed Prairie Dog (Luce 2003) calls for a minimum of one 5,000 acre prairie dog complex per state. Until or unless private landowners step

forward to volunteer creation of such a complex on private land, public lands will be required to achieve this goal. North Dakota has only one National Grassland in which this goal can be achieved.[1]

The Analysis Must Include an Alternative that Provides Habitat Recovery Goals for Black-footed Ferrets

NEPA Background and Requirements

We provide this NEPA background in order to emphasize that the NEPA analysis for this action not only requires the USFS to consider our proposed alternative, but to emphasize as well that the USFS must address the entirety of its purpose and need statement for the proposed action in order to develop a reasonable range of alternatives which may achieve this purpose and need, and to analyze each alternative in relation to its ability to meet this purpose and need.

NEPA, 42 U.S.C. § 4321 et seq., is our nation's basic charter for environmental protection. NEPA "was enacted in recognition of the profound impact of man's activity on the interrelations of all components of the natural environment" and "the critical importance of restoring and maintaining environmental quality." Utah Shared Access Alliance vs. Carpenter, 463 F.3d 1125, 1130-31 (10th Cir. 2006). NEPA contains "action forcing" provisions that require federal agencies to examine and report on the environmental impacts of federal actions. 40 C.F.R. § 1500.1.

Federal agencies fail to satisfy the goals of NEPA when they predetermine the outcome of the NEPA analysis. First, arriving at a decision in advance of the required NEPA analysis, such as by dismissing a viable and therefore reasonable alternative, renders an EIS inadequate. See Ress. Ltd., Inc. vs. Robertson, 35 F.3d 1300, 1307 (9th Cir. 1994). Second, predetermination of NEPA analysis strips the NEPA public comment process of its meaningfulness since the agency fails to consider adequately public input. See Montana Wilderness Association vs. Fry, 408 F.Supp.2d 1032, 1037 (D. Mont. 2006) ("The public's interest in the NEPA process will be degraded if the process is reduced to a series of hurdles to be cleared en route to a predetermined result.") .

The lead agency must "rigorously explore and objectively evaluate all reasonable alternatives" including alternatives that are "not within the [lead agency's] jurisdiction." Id.; see also Utahns for Better Transp. vs. U.S. Dep't. of Transp., 305 F.3d 1152, 1166 (10th Cir. 2002); Citizens' Committee to Save Our Canyons vs. U.S. Forest Service, 297 F.3d 1012, 1030 (10th Cir. 2002); Custer County Action Association vs. Garvey, 256 F.3d 1024, 1039-40 (10th Cir. 2001). Thus, when an alternative meets the purpose and need of the proposed action, it must be considered by the agency in the EIS. See 40 C.F.R. § 1502.13; Custer County., 256 F.3d at 1041.

While an agency is not obligated to consider every possible alternative suggested, no matter how "remote, speculative … impractical, or ineffective," Custer County, 256 F.3d at 1039-40 (citation omitted), the selection of alternatives is bound only by a "rule of reason" and some notion of

[1] In addition, this 5,000 acre objective by itself is likely not sufficient. Although the U.S. Fish and Wildlife Service will consider beginning a ferret reintroduction effort in prairie dog complexes as small as 1,500 acres, ultimately ferrets need more than 10,000 acres of prairie dogs in one location to persist as a viable population (CBSG 2004). The Forest Service must do more to protect the existing prairie dogs and encourage colony expansion to reach the objective of at least one 5,000 acre complex in the short term, with the ability to expand to more than 10,000 acres over the long term.

"practicality." See e.g. Id.; Utahns, 305 F.3d at 1163; Davis vs. Mineta, 302 F.3d 1104, 1120 (10th Cir. 2002); Airport Neighbors Alliance, Inc. vs. United States, 90 F.3d 426, 432 (10th Cir. 1996). The key factor in determining whether an agency has prematurely eliminated a possible alternative is whether the alternative would fit the stated purpose for the agency action. Utahns, 305 F.3d at 1163.

Moreover, we note that under Section 7(a)(1) of the Endangered Species Act, all federal agencies are under an obligation to provide habitat for and assist in the recovery of endangered species.[2] Reintroducing black-footed ferrets and maintaining habitat for a viable ferret population must be explicit objectives in any prairie dog management plan for the LMNG, therefore we are encouraged that this proposal will maintain the 3.63 Management Area for ferrets (Purpose and Need, Scoping Notice p. 4). All of the proposed alternatives for this action should include plans to enhance the 3.63 area to make it suitable for ferret reintroduction in the near future. These should include acreage and distribution targets for prairie dog colonies consistent with current best science regarding habitat needs for black-footed ferrets.

Shooting closures are necessary in the 3.63 Management Areas and Category 1-designated colonies.

It is our understanding that prairie dog shooting remains unregulated on the entire LM N G. Prairie dog shooting significantly reduces black-tailed prairie dog populations and population densities, alters prairie dog behavior, and may decrease colony expansion rates (see e.g., Appendix C, attached to our letter of Aug 4, 2006). Impacts of shooting may be unpredictable and colony-specific. Recreational shooting of prairie dogs can have a destabilizing effect on survival of prairie dogs in plague enzootic conditions (Segland and Schnurr 2010), and black-tailed prairie dog reproductive success (Pauli and Buskirk 2007a). There is evidence to suggest that prairie dog shooting results in the harming or killing of non-target species, such as the burrowing owl, ferruginous hawk, and mountain plover; and fragments of lead ingested by raptors when scavenging shot prairie dog carcasses have the potential to kill or severely disable raptors (see Appendix C, attached as Appendix 1, Pauli and Buskirk 2007b).

The LRMP includes the following guideline:

> Restrict prairie dog shooting where significant risks have been identified for other wildlife species or where shooting is preventing or slowing a desired prairie dog population expansion. Restrictions shall be year-long or seasonal, and dates of seasonal restrictions shall vary depending on the species at risk. Coordinate and consult with the appropriate wildlife agencies prior to implementation of restrictions.

Clearly from the evidence cited in Appendix 1 (Appendix C, attached to letter), and from the clear guidance of the LRMP, shooting should be closed, specifically within the 3.63 Management Area.

[2] "All other Federal agencies shall, in consultation with and with the assistance of the Secretary, utilize their authorities in furtherance of the purposes of this Act by carrying out programs for the conservation of endangered species and threatened species listed pursuant to section 4 of this Act."

"Purposeful Management" needs to drive prairie dog management in the 3.63 and Category 1-designated areas.

Most importantly, enzootic plague is likely driving most prairie dog colony dynamics today (Eads and Biggins 2015). Prairie dogs are unlikely to survive, let alone expand, under the plague regime which sees cyclical declines and devastating epizootics that are now common in prairie dog species. Defenders argues that it is insufficient to simply engage in hands-off prairie dog management. As suggested in the scoping notice, proactive management to expand prairie dogs (translocation from conflict areas, mowing, burning, artificial burrow installation, prophylactic dusting with plague-mitigating insecticide, use of sylvatic plague oral vaccine baits, shooting closures) is essential to meeting population objectives for prairie dogs. This will require a commitment of resources on the part of the USFS to accomplish these management tasks. Other National Grassland units have successfully partnered with federal, state, and NGO partners to accomplish these restoration tasks, but this requires an institutional commitment toward prairie dog ecosystem recovery on the part of the LMNG.

Mitigation efforts to maintain and increase prairie dog colonies need to be included in any alternative

The LRMP includes the following standard:

> Require mitigation measures to protect the national grassland resources when animal damage control activities are conducted by other governmental entities. Emphasize public safety; threatened, endangered, and sensitive species conservation; water quality protection, or other resource values.

To be consistent with the LRMP, the McKenzie Ranger District must offer mitigation strategies for any prairie dog control proposed. The following methods (also described above) to increase prairie dog colonies should be included in the Proposal:

- expanding the area designated as Category 1 or 3.63 management area;
- raising the habitat target level within the Category 1 or 3.63 management area;
- closing the Category 1 and 3.63 management area to prairie dog shooting;
- relocating prairie dogs to start new colonies in desired areas within the Category 1 and 3.63 management areas;
- immediately dusting prairie dog burrows in key colonies to prevent spread of plague prophylactically.

A better strategy would be to limit control until Category 1 and/or 3.63 management targets are met. We would refer you to the current management decision screens used on the Thunder Basin National Grassland (TBNG) in Wyoming (Record of Decision, TBNG, Prairie Dog Management Strategy and Land and Resource Management Plan Amendment #3 (the "ROD", Appendix B, http://www.fs.usda.gov/detail/mbr/landmanagement/planning/?cid=stelprdb5166980), that permit poisoning near private lands where expansion is occurring on private lands, but only once the 18,000 acre management target for prairie dogs is met in Category 1 (Decision Screen 3, Appendix B, ROD). If the USFS were constantly reducing the acreage around the periphery before it reached its goal, the agency would doom itself to continuously chasing an ephemeral target that it could never reach. This creates the unacceptable condition that the target represents a ceiling and not a floor. Since virtually all population viability analyses are based on minimum population numbers, it

makes it impossible to conduct planning or provide adequate habitat for prairie dogs and associated species when the floor fluctuates unpredictably depending on the complaints or tolerance of any given landowner. Thus, if the USFS is to take action reducing acreage within Category 2, it necessarily must replace the lost acreage elsewhere within Category 1. These options are discussed in the existing management framework (Decision Screen 6, Appendix B, ROD), but if lethal boundary management is to be applied over a large area then the decision screens should reflect the enhancement needed to accomplish this prior to conducting habitat reduction.

Anticoagulant toxicants should be prohibited for use in control of prairie dogs

The use of any toxicants with possible secondary poisoning impacts must be strictly prohibited. The use of anticoagulant poisons, such as rozol® to control prairie dogs is of great concern due to secondary toxicities to predators like black-footed ferrets, but also ferruginous hawks, burrowing owls and numerous other predators that might feed on the carcasses of prairie dogs that have ingested rozol and died.

Nonlethal alternatives should be developed as a first response to manage boundary conflicts

We support the USFS proposal to use nonlethal alternatives in the first instance on Category 2 colonies (Scoping at p. 4). The desire by some to remove prairie dogs from boundary areas presents an opportunity to implement key wildlife provisions of the LRMP by relocating prairie dogs to areas where the plan calls for increases. Prairie dog relocation can achieve significant removal results. Numerous prairie dog relocators licensed by the Colorado Division of Wildlife regularly achieve greater than 90% removal (L. Sterling, pers. com. 2006), which is many times comparable to poison bait uptake.[3]

Vegetative buffers are effective at restricting dispersal onto adjacent lands, but must be off-limits to livestock. Eliminating livestock grazing in buffer areas where prairie dogs are not wanted will help create conditions unsuitable for prairie dog colonization. For the best chance of success, we request that it be made mandatory that livestock grazing and other disturbances not occur in any areas where prairie dogs are removed. With the use of temporary electric fence to keep out livestock, buffer depths can be changed easily depending on adaptive management outcomes over time. In this way, optimum buffer depths can be found over time for the specific conditions in each location.

The following methods to limit unwanted prairie dog colonization on adjacent private lands should be included in the Proposal:

- consolidating public lands around important prairie dog colonies and potential habitat to reduce public/private conflicts in these areas;
- eliminating livestock grazing year-round in areas next to private lands where prairie dogs are not wanted so that vegetation has the opportunity to grow and make the areas less suitable for prairie dog colonization;
- eliminating livestock grazing during drought conditions in all areas where prairie dog expansion near private lands is not wanted.

[3] Poisoning efforts in South Dakota in 2005 achieved only 50% effectiveness on Fort Pierre National Grassland, 70-95% on Buffalo Gap National Grassland, and 70-80% on Oglala National Grassland (Nebraska National Forest 2006).

Arbitrary buffers should be discouraged

We are pleased to note that the USFS will address management activities in a 1/4 mile buffer on a case by case basis. An arbitrary buffer would not necessarily result in non-encroachment and re-colonization of private lands adjacent to USFS lands, particularly if livestock grazing continues within the buffer and on the private lands. Prairie dogs are highly mobile and will preferentially seek to re-establish on formerly occupied landscapes if available (Knowles 1986; Reading et al. 1989). They may bypass buffers and establish on private lands despite poisoning in the buffer if there is no visual barrier preventing them from doing so (Terrall 2006; Gray 2009).

It is our observation and opinion that a more flexible approach would recognize the following: 1) non-lethal buffers work in many but not all situations; 2) any buffers, including eradication buffers, will be ineffective if livestock grazing is continued within the buffers; therefore, if lethal buffers are established then livestock grazing must also be excluded in the buffer to make it effective; 3) dispersal of prairie dogs can be checked with much narrower vegetative buffers than with poisoning throughout a fixed grazed buffer, resulting in both less acreage removed from potential prairie dog habitat and more made available for livestock grazing; and 4) that there may be instances where vegetative buffers alone are insufficient to prevent private lands encroachment and a combination of management techniques may be necessary.

Therefore, we maintain that no proposed Alternative resulting in a net loss—in terms of quantity or quality—of black-tailed prairie dog habitat should be evaluated adopted by the USFS. In fact, the more accurate characterization of the purpose and need of this amendment is twofold: (1) to resolve boundary conflicts and (2) to facilitate the recovery of prairie dog-associated species, such as black-footed ferrets.

Finally, Defenders believes that any plan that addresses boundary conflict issues must simultaneously result in maintenance of or increases to the actual acreage that the USFS has established as its target for Category 1 (which is the only habitat where prairie dogs will be allowed to persist and expand without control). Thus, any alternative must consider how occupied prairie dog acres lost on USFS lands through boundary control within Category 2 are not only made up for elsewhere but also enhanced where possible. As we discussed earlier, at least one obligation of the USFS and part of the purpose and need for this action plan is to increase prairie dog populations with the end-goal of reintroducing ferrets. Common sense and science agree that this goal cannot be achieved by reducing prairie dog populations or habitat already prescribed under the existing Plan. To reduce, not increase, prairie dog population numbers and acres of habitat would be a clear violation of NEPA unless the best available science supports such a reduction. No credible science exists to support the reductions proposed if they are not similarly added elsewhere.

Proposed Alternative

Defenders thus proposes the following conditions that should be adopted as part of an alternative or alternatives as follows:

- At least one alternative should analyzed the feasibility of ferret reintroduction both as a means to limit prairie dog numbers and in terms of habitat needs required to support ferrets, which will serve as the management target for the 3.63 Area and Category 1 complexes;

- Shooting should be prohibited within Category 1 colonies;

- When the USFS has determined pursuant to a decision screen that vegetative barriers and other non-lethal management tools, which includes all available tools mentioned in the Scoping notice including translocation, are ineffective in Category 2, and prior to any lethal control considered as boundary measures within Category 2 when the acreage occupied by prairie dogs is below the minimum target of 5,400 acres, the USFS shall first:

    a. Establish that it has secured actual or potential (likely to be colonized by prairie dogs in 1-3 years) habitat equivalent to the quality and amount of habitat proposed to be reduced by one of the following means:
    b. An agreement to exchange, purchase, or lease an equivalent amount of land within or adjacent to Category 1 areas;
    c. A formal agreement with an adjacent landowner that would allow expansion onto another location;
    d. Translocation or reintroduction of prairie dogs from outside of Category 1 into Category 1 to establish new colonies within Category 1.

- If the USFS determines that lethal control is necessary it will continue to provide the kind of livestock exclusion that would result in minimization of future expansion so that future problems would be mitigated.

Additional Recommendations

We further suggest that the USFS establish a prairie dog working group–whose membership reflects the local and national interests in prairie dog management on the LMNG–to assist in decisions regarding the timing and use of lethal control within Category 2. The role of the group would be advisory only (subject to the limitations of the Federal Advisory Committee Act) but it would assist in greater communication and resolution of issues.

As part of the NEPA analysis, the USFS should analyze the benefits of ferret reintroduction as bio-control to reduce prairie dog density which in turn will affect prairie dog dispersal and encroachment and the need for a buffer or intensive boundary control.

There are numerous studies that find the economic benefits of poisoning are minimal at best (Collins et al. 1984; Slobodchikoff et al. 2009). Whether or not this is the case, the cost to the USFS, the taxpayers, and the additional costs to the wildlife management program should be explained and analyzed in USFS's NEPA analysis.

Conclusion

We ask that the USFS consider our proposed alternative as required by NEPA. It fulfills the purpose and need of the project as stated by the USFS.

Thank you for considering our comments.

Sincerely



Steve Forrest

Senior Representative
Rockies and Plains Program
Defenders of Wildlife

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