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First name: Frank G

Last name: Eathorne

Organization: Thunder Basin Grazing Association

Title: Chairman of the Board

Comments: Thunder Basin Grazing Association Comments on draft 2020 Amendment to the Thunder Basin National Grasslands Land and Resource Management Plan.

Note: The #2 alternative, "Proposed Action" is favored by TBGA, with the following proposed changes/comments.

Appendix A: Table

P. A6: Add "Translocations will be conducted in strict accordance with conditions imposed on the permit by WGFD and County Commissioners."

In previous translocations, not all conditions were observed (in some cases).

P. A6: Deltamethrin should not be used in the National Grasslands because of its detrimental effect on the food source (insects) of the Mountain Plover. Per USFS study in Montana.

P. A7: Delete satellite colony provision.

Unnecessarily complicates prairie dog management and increases expenses with little benefit to the prairie dog.

P. A8: Please include the label restrictions and the reasons for FS restrictions being more than the label.

P. A9: Delete "3", insert "2".

Presuming ineffectiveness is due to bait shyness, retreatment for a third year is a waste of resources.

P. A9. Delete "The use of anticoagulant rodenticides and fumigants are prohibited. Standard".

Insert from Alternative 3, incorporating the change above from "three" to "two" - "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."

Provides for more effective control of the prairie dog when needed.

P. A-10: (H.XX)- Add from Alternative 3- "Where persistent or imminent prairie dog colony encroachment occurs, a temporary 1- mile boundary management zone may be used to prevent encroachment. Requests 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"

This provision will likely be needed to curb a future rapid expansion of the prairie dog population.

P. A-14: Note from page 49 of the DEIS: "Ecological Site Descriptions are in the development stage for the Major Land Resource Area 51B" (which contains Thunder Basin National Grasslands). (Emphasis added).

Reliance on ESD's at this time should be tempered with caution.

P. A-15: "Pastures will be large -add "unless management considerations dictate otherwise.""

There may be situations where effective management of grazing and other resources are best served by reducing the size of pastures.

P. A-40: "Pastures will remain large[hellip] strike[mdash]"to the extent feasible", add- "unless management considerations dictate otherwise".

See previous comment.

P. A-45: (bottom of page)- Same as previous comment.

P. A-49: What is the correct number of acres for 2.1 SIA? As stated - 3,804 acres? Or from p. A-16, Proposed Alternative, there is designated 14,600 acres in 2.1 SIA (Broken Hills), plus from p. A-23

another 4,747 acres in 2.1 SIA (Cellars Rosecrans) for a total of 19,347 acres? Is there another SIA in addition to the proposed Cheyenne River SIA? Or is this a printing error? Please explain.

P. A-49: Manage livestock grazing to promote development of mature cottonwood willow riparian areas and other desired habitat conditions. Delete "Standard", insert "Guideline".

See also DEIS p. 65, last sentence- "However, it is unlikely a reduction in livestock grazing would result in increased cottonwood recruitment due to ongoing land uses that have altered the hydrogeomorphic condition of

the riparian systems and resulted in dewatering and salinification. Also, please explain the land uses that have resulted in dewatering and salinification.

P. A-53: Delete "3. If the responsible official [hellip][hellip][hellip][hellip][hellip] (to the end of the paragraph)".

The concept of satellite colonies should not be a part of this proposal- this provision complicates management and requires more time and finances to accomplish than warranted. Also results in prairie dogs being spread across the landscape, thus is counter-productive.

P. A-53: (bottom of page) Delete "[frac14]-mile", insert "[frac12] mile". Add statement as follows: "Boundary Management Zones extend [frac12] mile from private/State lands onto adjoining National Grasslands. Lethal control, including density reduction, shall be used to control encroachment if requested by the affected landowner."

South Dakota National Grasslands and Badlands National Park both, as I understand, employ [frac12] mile control areas.

P. A-54: "Where persistent or imminent prairie dog colony encroachment occurs, a temporary [Delete "3/4", add "1"] mile Boundary Management zone may be used [hellip][hellip][hellip]..

Please see comment for p. A-10 above.

P. A-55: Delete "and satellite colonies".

Please see comment for p. A-7 above.

P. A-55: Add "Recreational prairie dog shooting is allowed year-around, except in Management Area 3.67 when prairie dog acres are below 7,500 acres. Standard."

Recreational shooting has been shown to have little long-term effect on prairie dog population. And it was a popular activity on TBNG, providing many hours of recreation for those participating, as well as contributing to the local economy. See discussion DEIS P.96.

P. A-60: Objective (Justification) The reference given is p. D-12 in the Land and Resource Management Plan. On that page, I find a list containing the numbers 18, 21, 22 and 69. This proposed amendment cites the numbers 18, 22 and 66.

On p. 1-14, Thunder Basin Land and Resource Management Plan, I find #18 to contain the phrase "or thought" to be occupied by black-footed ferrets[hellip]. In the interest of consistency, please strike "or thought".

#21 was dropped from this reference- (pertains to replacing BFF habitat lost due to poisoning of prairie dogs or development of new facilities within colonies), but is replaced by proposed new language in the Proposed Action.

#22 -again, for consistency, delete "or thought to be occupied".

#69 pertains to locating new roads near or through existing prairie dog colonies.

P. A-66: Delete definition of Satellite Prairie Dog Colony.

Please see comments above for pages A-7 and A-55.

P. A-67: Delete "deltamethrin or".

Please see comment above for P. A-6.

Note: Acceptance of any of the above changes would necessarily require inclusion in other elements of the proposed amendment, such as the DEIS itself.

Comments on the Draft Environmental Impact Statement in addition to those above, which should be carried through to the DEIS :

Summary- p. ii-

Alternative 1-The last word in the paragraph should be, I believe, "acres", not "colonies".

Alternative 3- In the last line, insert "be" after "would".

p. 6, Table 2. Extent[hellip]..

Please add 2019 numbers to the table as they are now available.

p. 61- With regard to the Mountain Plover, it is likely that much more than 10,000 acres of MPLO nesting habitat is available on TBNG outside prairie dog colonies, but simply has not been inventoried. Casual observation of the soils in the area reveal a high percentage of bare ground. Range transects support this finding. Research is needed to document this statement, which would then lessen the need for 10,000 acres of prairie dogs to provide this habitat.

p. 69- At the bottom of the page, after "Federal allotments, insert ", thus causing a significant negative economic effect, perhaps even catastrophic failure, of the ranching operation".

The socio-economic effects are very poorly addressed in the DEIS. I urge more robust development of this effect with an emphasis on the impacts to landowners and permittees within the Thunder Basin National Grasslands.

p.70-second sentence- delete "Many", insert "All". (A requirement for being granted a TBGA grazing permit is dependency on the permit for the ranch to be a viable unit. (TBGA Bylaws, Article 9)

p. 70- At end of first paragraph, after "operations", add "which may, in turn, cause economic hardship, or even collapse, of the ranch unit".

p. 75- last paragraph- After "grazed by 57 association members. Add "However, annual permitted AUM's average only about 55,000 over the last thirty years due to loss of acres to the coal mines.

p. 91, Table 17 demonstrates that even under alternative 2, the proposed alternative, which provides for 10,000 acres of prairie dogs, there remains a loss of 5300 AUM's that are consumed by the prairie dogs. At the current National Grasslands grazing fee of \$1.35/AUM, that amounts to lost income of \$7,155.00, mostly to the Thunder Basin Grazing Association. That amount may seem small, but it would help replace the AUM's lost to mining.

p. 94- Please update Table 19 with 2019 costs.

p. 96- after "recreational shooting opportunities" add "as well as soil erosion by wind and water off prairie dog colonies, and associated Air Quality concerns.

General comments:

The Collaborative Stakeholder Group should be continued. The affected landowners in the Thunder Basin National Grasslands are the most knowledgeable about the conditions on the ground and have much to contribute to such a committee. They also have the most to lose, or gain, from actions recommended by this group, hence their preferences should be given additional weight.

Submitted for the Board of Directors by Frank G. Eathorne, Jr., Chairman