

Data Submitted (UTC 11): 1/9/2020 10:00:00 AM

First name: Quade

Last name: Schmelzle

Organization: Wyoming Weed and Pest Council

Title: Council Secretary

Comments: Please accept the following comments from the Wyoming Weed and Pest Council (Council) regarding the United States Forest Service (USFS) request for comments regarding the draft Biological Assessment.

The Council comprises twenty-three (23) Weed and Pest Control Districts in the state including Converse County Weed and Pest Control District; Campbell County Weed and Pest Control District; Weston County Weed and Pest Control District; Crook County Weed and Pest Control District and Niobrara County Weed and Pest Control District.

The Wyoming Weed and Pest Control Districts are required by state statute to implement an "effective program" for the control of designated weeds and pests. Prairie dogs (genus *Cynomys*) are listed as a designated pest in the state of Wyoming due to their destructive impact on agricultural and natural resources. We believe any plan amendment the USFS approves should recognize prairie dogs accordingly.

Based on these principals, the Council offers the following comments and recommendations.

Comments on the Draft Thunder Basin National Grasslands 2020 Plan Amendment

General Comments:

Black-footed ferret reintroductions. The Council does not support the reintroduction of black-footed ferrets in the Thunder Basin National Grasslands. However, we understand the strategy is required under National Environmental Policy Act (NEPA) to include protections and improvements for black-footed ferrets which includes the management of black-tailed prairie dogs as habitat. We would reiterate our position on reintroductions is in line with the Wyoming Game and Fish; Wyoming Department of Agriculture and the Wyoming State Lands and Investments Office. In their letter dated November 17th, 2016 it noted reintroductions should not occur until a management strategy has been successfully implemented that protects the interests of the lessees and neighboring landowners.

Rodenticides. The DEIS summary states an amendment to the prairie dog strategy is needed to "[hellip]increase the availability of lethal prairie dog control tools to improve responsiveness to a variety of management situations,[hellip]" (Page i). The Council does not believe any of the Alternatives meet this purpose.

Zinc phosphide is an effective tool for prairie dog management, however the continued reliance on one form of rodenticide in treatment areas will increase "bait shyness" will diminishing the FS ability to meet management goals.

Additionally, label restrictions such as calendar use and limitations on retreatments will regulate the ability for zinc phosphide to assist with management needs. Without the approval of anticoagulants and fumigants within any of the Alternatives, the FS will not meet the purpose of the amendment. Anticoagulants have been approved by the Environmental Protection Agency (EPA), the Wyoming Department of Agriculture (WDA) and have been properly vetted through the USFS Pesticide Use - Risk Assessment.

The US Fish and Wildlife Service reviewed these products under the required Section 7 consultation with the EPA. In response, the USFWS made note of their concerns with anticoagulants as related to the Migratory Bird Act. The EPA and registrants made and approved label changes to address those concerns as needed.

The EPA, as the lead agency for pesticide registration, concluded those changes met the needs expressed in the Section 7 consultation. It is not the role of the USFWS to regulate pesticides beyond the consultation process, and the FS should not be indentured to the USFWS in their final decision.

The Council strongly believes the FS should include the use of anticoagulants and fumigants within the strategy. The FS can prioritize the use of zinc phosphide over anticoagulants within the implementation, but limiting the rodenticides to only one formulation is contradictory to the intent of this amendment.

Proposed Alternatives

Alternatives 1 - No Action The Council does not support Alternative 1. We believe the current prairie dog management strategy has proven ineffective and has restricted the ability for the FS to react to prairie dog expansions and encroachment as needed. It has also served as a catalyst to the most recent plague epidemic in the region.

Alternatives 3 - Grasslands-wide The Council supports certain aspects of Alternative 3, however this Alternative would need to be clarified further. The cost of grasslands wide monitoring may take up a significant portion of the FS management budget. Additionally, comprehensive grasslands wide mapping could potentially delay FS management decisions in critical areas. However, spreading the acreage objective over a large area may reduce the pressure on MA 3.67.

Alternative 4 - Prairie Dog Emphasis The Council does not support Alternative 4. Target acre objectives for Category 1 mirror the current objectives. Those targets have proven damaging to the ecological system and unmanageable for the FS and its partners.

Alternative 2 - Proposed Action The Council supports Alternative 2. However, there are some areas we believe should be further addressed or clarified.

(Page 29) **Management Area 3.63 and the Cheyenne River Zoological Special Interest Area.** The Council recommends that The Cheyenne River Zoological Special Interest Area (SIA) be incorporated into Management Area 3.67 (MA 3.67). Prairie dogs already exist in the SIA and therefore would help the TBNG in meeting the 10,000 acre objective.

(Page 32) **Prairie Dog Colony Acre Targets and Distribution.** The Council supports the removal of Category 2 and Category 3 management areas, and focusing the management within MA 3.67. It should be noted that prairie dog colonies have existed in these areas for centuries and the removal of theoretical category boundaries will not translate to eradication of those historic colonies. In other words, the Council strongly believes prairie dog colonies will continue to exist in these areas not identified within the plan.

(Page 32) **Boundary Management Zones.** The Council supports the control of prairie dogs within 1 mile of residences as the highest priority. Prairie dogs can transmit plague to humans and protecting the community from potential exposure should be the highest concern. The Council does not support the concept of boundary control to control expansion. Boundary management in some cases may delay expansion, but without colony density control, boundary management will be expensive and time consuming. Additionally, limiting rodenticides allowed under the plan will likely influence overall boundary control success. Because the Council sees boundary management as a temporary "band aid" we would remind the FS that Weed and Pest Control District are not required to contract with the FS, and each district may coordinate with the FS differently. We would advise the FS to work with the USDA - Wildlife Services on implementation of boundary management when the local Weed and Pest Control District cannot or will not provide that assistance.

(Page 32) Thresholds for Rodenticide Use. Using established acres as a trigger for management activities is a flawed algorithm for deeming prairie dog management needs; however the Council appreciates Alternative 2 incorporating flexibility within the thresholds to allow treatments when acreage in MA 3.67 is below 10,000 acres.

(Page 33) Density Control. The Council strongly supports the inclusion of density control within the finalized TBNG strategy. Density control is not the eradication of colonies. Density control allows for program managers to reduce the potential for an overcrowded colony to expand or encroach into unwanted areas. Density control will assist the FS in managing for a diverse plant community.

If the FS is reluctant to include density control due to push back from other organizations and groups, we suggest the FS ask for assistance from the Weed and Pest Control Districts and landowners in the area who have implemented density control successfully for advice. We also believe pre and post treatment monitoring of active prairie dog mounds will be critical in determining density control success.

(Page 33) Recreational Shooting. The Council believes recreational shooting should be allowed year round. Prairie dogs are a state designated pest and we believe any wildlife shooting restrictions or hunting seasons on public lands should only be determined by the state, and not the federal agencies. We do not believe recreational shooting is an effective tool at managing prairie dog colonies. We also believe recreational shooting of prairie dogs has economical value to the local communities. Out-of-state hunters traveling to the TBNG for recreational shooting provide local communities and businesses additional commerce that is not often recognized.

If the FS does implement recreational shooting closures in MA 3.67 and the satellite colonies it is imperative that the FS makes sure that information is readily available for the public through public notices, signage and website updates.

(Page 33) Drought Plan. The Council supports the plans flexibility on target numbers based on drought conditions.

(Page 33) Plague Management. The Council does not oppose the implementation of plague management through the use of deltamethrin. When deemed appropriate to protect human health and safety by the FS and neighboring landowners, plague management should be utilized.

Plague management should not take budgetary priority over management of prairie dog encroachment when the request is not related to human health and safety. The implementation of plague management for management goals not related to human health and safety should require approval of the collaborative stakeholder group regardless of who is paying for the treatments.

(Page 34) Management Strategy and Collaborative Stakeholder Group. The Council supports the creation of a collaborative stakeholder group. However, we are uncertain as to what the expected time and travel requirements will be for participation. The success of the stakeholder group will be highly dependent on the inclusion and involvement of the private landowners from the local area. The FS should be expected to compensate any private citizen for travel costs associated with serving on the stakeholder group.

Although the Council supports the idea of the stakeholder group, we would remind the FS, it is the agencies ultimate responsibility to manage the TBNG, not the stakeholder group. To do this the FS will need to maintain staff in the Douglas Field office with experience in managing this program and willing to meet and work with the community directly impacted by these decisions. Furthermore, the FS will need to make the financial commitment to the proper implementation of any Alternative they implement.

The Wyoming Weed and Pest Council appreciate the opportunity to comment on the proposed amendment. We look forward to continuing to work with the FS on this program and others across the state.