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Comments: Thunder Basin Grassland Prairie Ecosystem Association (Association) has participated in various efforts to address prairie dog management within the Thunder Basin National Grassland over the past two decades including the most recent working group. We appreciate the effort Forest Service has made to involve a wide variety of groups and perspectives while developing the current planning documents and continue to fully support a robust collaborative approach to prairie dog management in northeast Wyoming.

In general, the Association supports most components of Alternative 2 - The Proposed Action as given in both the narrative version and the proposed changes to Chapter 1, 2, & 3 plan direction. However, we would like to provide the following comments and suggested modifications to the Thunder Basin National Grassland 2020 Plan Amendment - Draft Environmental Impact Statement (DEIS):

Chapter 1 - Unless otherwise noted, the Association supports all of the changes indicated in the Proposed Action.

\* p. 1-8/Goal 4b (Appendix A, p. A-2): We fully support the proposed inclusion of the collaborative approach and encourage the Forest Service to fully adopt the Collaborative Stakeholder Group management action as given in Appendix B, page 1.

\* F.XX (Appendix A, p. A-3): We recommend that the following language be included in the proposed action: "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 250 to 800 acres. Guideline" based on TBNG Biological Evaluation of Animal Species and Potential Animal SCC Report, p. 139.

\* F.XX (Appendix A, p. A-7): After further discussion with our members and other landowner groups, we do not believe that the use of satellite colony designations to provide additional prairie dog management flexibility in MA3.67 will offset the following issues and concerns: 1) based on costs incurred by the Association for collaborative monitoring over the past three years, effectively monitoring satellite colonies will be very expensive and will reduce the effort that can be directed to monitoring in MA 3.67, 2) designation of satellite colonies outside of MA 3.67 will create additional demands on boundary control to protect adjacent private landowners, and 3) designation of satellite colonies will reduce the time, manpower, and financial resources that can be better utilized for management control within MA 3.67.

\* p. 1-23/H.1 as revised (Appendix A, p. A-9): We recommend that fumigants be included in the list of allowable lethal control measures in the proposed action. To protect associated species, use of fumigants could require a pre-use search for burrowing owl nests or might be used only in active prairie dog burrows.

Chapter 2 - Unless otherwise noted, the Association supports all of the changes indicated in the Proposed Action.

\* p. 2-2/Broken Hills, Desired Condition (Appendix A, p. A-15): To aid in prairie dog management and restoration efforts, we suggest adding the following to the last paragraph. "Pastures will be large unless prairie dog management considerations dictate otherwise."

\* p. 2-5/Broken Hills, Objectives, Infrastructure, 1 (Appendix A, p. A-18): As above, we suggest that the Proposed Action be changed to read "The landscape is dominated by large pastures sizes, except where prairie dog management considerations dictate otherwise, 15 years from plan approval. Objective"

\* p. 2-12/ Cellars Rosecrans, Objectives, Infrastructure, 1 (Appendix A, p. A-25): As above, we suggest that the Proposed Action be changed to read "The landscape is dominated by large pastures sizes, except where prairie dog management considerations dictate otherwise, 15 years from plan approval. Objective"

Chapter 3 - Unless otherwise noted, the Association supports all of the changes indicated in the Proposed Action.

\* p. 3-9/SIA 2.1 (Appendix A, p. A-49): We suggest replacing the last bullet point under Additional Direction with the following: "Utilize this area to demonstrate the benefits of upland water development and other innovative livestock grazing management techniques to promote development of mature cottonwood willow riparian areas and other desired habitat conditions. Standard"

\* MA 3.63/MA 3.67, Fish and Wildlife, XX (Appendix A, p. A-53, Item 3): As indicated above, we do not believe that the concept of satellite colonies is beneficial and recommend that references to these colonies be eliminated from the Proposed Action.

\* MA 3.63/MA 3.67, Fish and Wildlife, XX (Appendix A, p. A-54): In order to ensure adequate mountain plover habitat, we suggest modifying the Proposed Action to read "Density control (for example, using rodenticides, translocation, or collapsing of burrows) may be used to maintain desired vegetation conditions within a prairie dog colony. Desired vegetation structure and composition may vary by ecological site or colony and should include consideration of necessary mountain plover habitat. Where density control occurs, pretreatment data including active prairie dog burrows, mountain plover habitat conditions, mountain plover use, etc. must be collected, and similar monitoring data must be collected for a minimum of two years after treatment. Guideline."

\* MA 3.63/MA 3.67, Fish and Wildlife, XX (Appendix A, p. A-55): Delete reference to satellite colonies.

## Appendices

\* Glossary, Satellite Prairie Dog Colony (Appendix A, p. A-66): Delete

\* Glossary, Prairie Dog Colony Control Tools (Appendix A, p. A-67): Add fumigants to the list of tools.

## Appendix B

\* Prairie Dog Density Control (Appendix B, p. B-4): As above, we suggest that mountain plover habitat conditions and mountain plover use be explicitly included in the determination of where to conduct density control. While the focus in paragraph 2 on "more productive ecological sites such as the loamy and lowland" helps clarify density control goals, it would be helpful to provide additional parameters as to where density control could occur. As mentioned in paragraph 3, we have no research examining the impact of density control on prairie dogs or associated species, so we would suggest incorporating a robust monitoring/research effort to determine these impacts.

\* Since the northern end of the proposed MA 3.67 overlies the Thunder Basin sage-grouse core area, it would be helpful to have a description of how the Forest Service intends to manage prairie dogs to avoid destroying sage-grouse habitat. We would suggest a discussion that highlights the historical co-existence of sage-grouse and prairie dogs in this area but also restricts management actions that diminish sage-grouse and sagebrush habitat. The discussion should also include pro-active management actions that could be used if prairie dogs are actively destroying sage-grouse habitat.

## General Comments

\* Creation of New Alternative for the FEIS. We strongly support creation of a new MA 3.67 focusing on short-stature vegetation as delineated in the DEIS along with many components of Alternative 2. However, we would suggest that the Forest Service create a new, blended version of the plan components based on DEIS Alternative 2 which would include the components indicated above for evaluation in the Final EIS. We believe this will yield a more comprehensive document and provide a clearer connection to the final Record of Decision.

\* Modification of the Proposed MA 3.67. After looking at both the 2016-2017 maximum prairie dog colony extent and 2019 mapping efforts, we suggest reevaluating the proposed MA 3.67 to focus on the "best" prairie dog habitat. This might include:

\* Revising the northeast borders of MA 3.67 to follow the pasture boundaries. This would have the boundary follow the Dry Lake Pasture fence on the east, the Underwood Draw/East Pasture fence on the north and east, and the Keyton Pasture fence on the east until it intersects the SIA.

\* Eliminating some of the northwest portions of MA 3.67 (perhaps the Northwest Pasture) that were only lightly used.

\* In order to keep MA 3.67 acreage the same, it might be advisable to include an equal number of acres of the southern portion of MA 3.63 which showed high prairie dog use in 2016-17 and recolonization in 2019. We recommend that this area not be connected to the northern MA 3.67 area and that SIA 2.1 continue to serve as a geographical "barrier" which might help minimize the spread of plague. Retaining a southern area would also help reduce the impact on permittees in the currently proposed MA 3.67.

This might be an ideal area to research density control techniques and determine impact (either positive or negative) on mountain plover habitat. We would be willing to work with Forest Service and other interested stakeholders in developing and conducting this research.

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 continuing the collaborative process, utilizing community input and the best available science to develop prairie dog and associated species management tools for the Thunder Basin National Grassland.