

Thunder Basin Grazing Association

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Objection to Draft ROD and FEIS-2020Thunder Basin National Grasslands Plan Amendment

1. The National Grasslands were created in the 1930's by Congress as it recognized that another Dust Bowl was being created in the High Plains by encouraging the settlement of these arid areas. The Land Utilization Programs, followed by the Bankhead-Jones Act, were developed as a response. The intent of Congress was to change the use of these lands from farming to one more appropriate for the climate- grazing. Proper grazing practices do not denude the land. Prairie dogs have been a part of this landscape for many years. However, prairie dogs in high numbers and concentrations do denude the land, thus causing the Dust Bowl effect. Control of numbers and densities of prairie dogs are essential to the health of the land- witness the effects of the population explosion of the prairie dogs in 2017.
2. The proposed Boundary Management Zones will prove to be inadequate to control the prairie dogs' repetitive expansion on to adjacent private and State lands in most cases. I urge the adoption of larger BMZ's in most cases, similar to the more effective boundaries used in the Buffalo Gap National Grasslands LRMP.
3. Sage Grouse and prairie dog Management Areas must not be allowed to overlap- in fact, a buffer area, rigorously enforced with regard to prairie dog encroachment, should be established where the two species habitat overlaps. Sage Grouse numbers continue to decline and any action, or inaction, which contributes to the decline must be remedied.
4. The use of Deltamethrin, or any other substance, to protect the prairie dog from sylvatic plague by reducing the flea population is counter-productive to the survival of another important species- the Mountain Plover, which has been proposed for listing under the Endangered Species Act. A study done by US Forest Service in Montana demonstrated that the use of Deltamethrin degraded the insect population to the detriment of the Mountain Plover population in that area. I submit that the Mountain Plover will be more impacted from the lowered insect population than will the prairie dog, therefore I request that Deltamethrin, or any other substance which reduces the insect population to favor the prairie dog, not be used in TBNG.

Thank you for considering these objections.


Frank G. Eathorne, Jr.
Chairman of the Board