



**DELIBERATIVE, PRE-DECISIONAL, FOR INTERNAL COORDINATION ONLY**

**Topic:** 2020 Thunder Basin National Grassland Prairie Dog Amendment – Project Update

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**Issue Summary:** On April 18, 2019, the Medicine Bow-Routt National Forests and Thunder Basin National Grassland (TBNG) initiated public scoping for the Prairie Dog Amendment via publication of a Notice of Intent in the Federal Register. The scoping period ended on May 20, 2019; approximately 500 comment letters were received, with about 40 unique and substantive comments. The interdisciplinary team (IDT), which includes external members representing the Wyoming Game and Fish Department, Wyoming Department of Agriculture, and county commissioners, has read and coded all comments and is working to document scoping issues, develop alternatives, and select indicators for analysis.

**Background:** Preliminary issue statements and likely alternatives are presented below.

**Scoping Issues:**

1. **Species Viability/SCC** – Loss of suitable prairie dog habitat may lead to loss of viability for prairie dogs and associated species.
2. **BFF Recovery/Requirements** – Providing prairie dog acres and density may impact the sustainability of a black-footed ferret program in the future. Social and biological issues regarding black-footed ferrets may lead to reintroduction challenges.
3. **Forage for Permitted Livestock** – Occupied prairie dog colonies may impact the forage available to permitted livestock within NFS-managed lands.
4. **Prairie Dog Expansion onto Private and State Lands** – Prairie dog expansion from federal lands onto private and state lands may lead to resource conflicts, financial impacts, and public health and safety concerns.
5. **Socio-economics** – Active management of prairie dog acres while providing forage for livestock may lead to prioritization challenges.
6. **Use of Rodenticides, Including Anticoagulants** – The use of rodenticides may affect non-target wildlife species.
7. **Restricting Rodenticides** – May make control ineffective.
8. **Failure to Implement Current Management Plan and Conservation Strategy** – More aggressive implementation of the current plan, including use of prescribed fire, translocation, buffer fences, shooting closure, application of Deltamethrin (“Delta Dust”), and control along boundaries would reduce conflicts and the need for a plan amendment.
9. **Laws, regulations, and policies** – National Forest Management Act, National Environmental Policy Act, Endangered Species Act, and 2012 Planning Rule must be followed and implemented properly for this plan amendment, especially with regard to management of at-risk species.
10. **Buffer Zones** – Buffer zone of ¼ mile may not be enough to prevent encroachment.
11. **Density control** – Density control may lead to a loss of habitat.
12. **CCAA, CCAs** – May be providing additional habitat for prairie dogs and associated species within the grassland administrative boundary that is not accounted for.





13. **Implementation of New Plan** – Plan implementation via staffing and/or financial resources may limit effectiveness.
14. **Plague/Human Health** – Historical recurrence of plague in the area may affect future black-footed reintroductions and occurrence of potential human health impacts.
15. **Sage Grouse Habitat** – Prairie dog occupancy may affect sage grouse habitat.

#### **Preliminary Alternatives:**

1. **Modified Proposed Action** – The proposed action included a target of 10,000 acres of prairie dog colonies in proposed management area 3.67, with the option of using satellite acres to allow control activities inside of 3.67 as long as cumulative acres sum to 7,500 acres. It also included a ¼ mile boundary management zone (BMZ) that could be expanded to ¾ mile by special request. We anticipate analyzing a modified proposed action that emphasizes acres in 3.67 as a 10,000 acre complex suitable for future BFF reintroduction, addition of seasonal shooting restrictions within 3.67, and more detail regarding density control and management of colonies outside of 3.67.
2. **Grassland-wide Alternative** – We presented the concept of a “grassland-wide” alternative, in which all prairie dog acres on the grassland count toward a combined target, in the scoping document. Several commenters encouraged us to analyze this alternative. This alternative would maintain a target of 10,000 acres or more, and would manage prairie dog colonies for conservation across the grassland until the target is met. A collaborative stakeholder group would work to provide recommendations on preferred sizes and locations of conservation versus control colonies as acres approach 10,000 on the grassland. Although 3.67 would not have its own target, the majority of colonies are likely to occur there based on historic colony locations. This alternative would likely analyze a ½ mile BMZ with possible expansion to 1 mile by special request.
3. **Modified No Action** — Environmental organizations feel strongly that the current plan has not been implemented, and that conflicts could be reduced substantially if we implemented the current plan with more boundary work, both lethal and non-lethal. We anticipate analyzing a “modified no-action” alternative that maintains the current management area 3.63 and current acre targets and habitat management categories, but removes decision screens and allows control work in boundary management zones regardless of interior acres.
4. **No Action** — Analysis of a no action alternative will be critical given the environmental organizations’ position that this alternative provides adequate management flexibility.

We received alternative suggestions from the Association of National Grasslands (ANG), Rochelle Community Organization Working for Sustainability (RCOWS), and Western Watersheds Project (WWP). Elements of the ANG proposal will be integrated into the modified proposed action and grassland-wide alternative. Based on preliminary consideration, it is unlikely that the RCOWS and WWP proposals will be analyzed in detail. Alternatives analyzed in detail will include specific contrasting components such as shooting restrictions, use of anticoagulants and fumigants in boundary management zones, size of boundary management zones, and habitat acre targets, including total target and size and distribution of colonies.

**Recommendation:** We seek regional office support to continue working toward completion of a draft EIS in October 2019 based on alternatives equal or similar to those presented here. Issues, alternatives, and indicators will be finalized at an IDT meeting June 25-27, 2019. We expect the draft EIS to be released in October 2019, final EIS and draft ROD in May of 2020, and a final decision in the fall of 2020.

