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Comments: Public lands belong to the public. Public watershed and public wildlife belong on public lands, not commercial, non-native livestock. And certainly not livestock at the expense of public land quality and public water quality, and at the expense of public wildlife. Commercial livestock grazing does not benefit the public, not given the large taxpayer-funded subsidies, not given the damage livestock grazing does to the public flora and fauna, not given the restrictions to public access that are the reality of many grazing allotments.

In general, protecting wildlife and wildlife habitat protects the public and the public resources on public lands!

In general, protect the public resources - public lands, public flora and fauna, public watershed - rather than subsidize commercial grazing and degradation of public resources!

KEEP AS IS: p. 1-9/B.2 "Manage land treatments to maintain enough organic ground cover in each land unit to prevent harmful increased runoff (exceptions shall occur in special habitat situations (e.g. prairie dog habitat))." If livestock growers cannot live in a world with prairie dogs, let them leave. Don't kill the prairie dogs or harm their habitat!

KEEP AS IS: p. 1-14/F.18 "n prairie dog colonies known or thought to be occupied by black-footed ferrets, limit oil and gas development to one location per 80 acres to help maintain suitable ferret habitat." The proposed change invites playing ignorant and suppressing research to avoid protecting ferret habitat.

KEEP AS IS: p. 1-15/F.19 "To help provide suitable habitat for black-footed ferrets and their young during the breeding and whelping seasons, prohibit the following activities within prairie dog colonies, or those portions of larger colonies, occupied or thought to be occupied by black-footed ferrets from March 1 through August 31: construction (e.g. roads, water impoundments, oil and gas facilities);reclamation; gravel mining operations; drilling of water wells; oil and gas drilling." Again the proposed change encourages playing ignorant as well as the suppression of research and

KEEP AS IS: p. 1-15/F.20 "To help provide suitable habitat for black-footed ferrets and their young during the breeding and whelping seasons, do not authorize the following activities within prairie dog colonies, or those portions of larger colonies, occupied or thought to be occupied by black-footed ferrets from March 1 through August 31: construction (e.g. pipelines, utilities, fencing); seismic exploration; permitted recreation events involving large groups of people." Protect the years of investments that have gone into protecting the prairie dogs, black-footed ferrets, and their habitats.

KEEP AS IS: p. 1-15/F.21 (as revised in Amendment 3, 2009) Any net loss of suitable black-footed ferret habitat as a result of development of new facilities within colonies shall be replaced within the year. This is based on the amount of suitable habitat available prior to prairie dog dispersal in the year of the development." Historians say the open range closed with the nineteenth century, but such proposed changes show that a few large stock operators still carry undue influence over the public lands, which are by law the property of the public who benefit from the public lands, the public watersheds, the public wildlife, but do not benefit from commercial livestock much less from subsidizing commercial livestock operations and the degradation of the public resources that accompany grazing non-native species on public lands.

KEEP AS IS: "p. 1-15/F.22 For routine maintenance, access to oil and gas facilities in prairie dog colonies occupied or thought to be occupied by black-footed ferrets should be limited to daylight hours. This does not apply to emergency repairs." Again, research and knowledge should be encouraged rather than discouraged.

KEEP AS IS: "p. 1-16/F.27 Any net loss of suitable and occupied mountain plover habitat as a result of prairie dog poisoning or development of new facilities within prairie dog colonies will be replaced within the year by concurrent expansion of suitable plover habitat or in some cases, by enhanced management and protection of occupied plover habitat elsewhere on or near the national grassland. The amount of habitat loss is based on the amount of suitable and occupied habitat available prior to prairie dog dispersal in the year of the poisoning or development." Wildlife species are not competing in a beauty contest much less in a livestock operator-judged contest. We the public can live with all wildlife species. Commercial livestock operators can pay commercial rates on private land but we the public should not subsidize their degradation of national, public resources. I would rather a mountain plover over a cow on public lands any day, and every day!

KEEP AS IS: p. 1-16/F.28 To help reduce disturbances and risks to nesting mountain plover, prohibit the following activities in plover nesting areas or within 0.25 miles of plover nests from March 15 through July 31: construction (e.g. roads, water impoundments, oil and gas facilities); reclamation; seismic exploration; gravel mining operations; oil and gas drilling; drilling of water wells; prescribed burning." Climate change is bring earlier springs, longer summers, and more extreme weather. I have not seen any science saying later nesting, but I have seen multiple journal articles saying earlier nesting seasons.

KEEP AS IS: p. 1-16/F.29 To help reduce disturbances and risks to nesting mountain plover, do not authorize the following activities in plover nesting areas or within 0.25 miles of plover nests from March 15 through July 31: construction (e.g. pipelines, utilities, fencing); workover operations for maintenance of oil and gas wells; permitted recreation events involving large groups of people; grasshopper spraying; prairie dog shooting (in consultation with state wildlife agencies and U.S. Fish and Wildlife Service)." "Do not authorize" is clear and absolute and less inviting to livestock industry interpretation than "should not be authorized." Furthermore, shooting prairie dogs is not necessary nor is it desirable. Shooting prairie dogs during plover nesting can only disrupt nesting. That is a bad idea, a bad thing to do. Don't do it.

KEEP AS IS: p. 1-16/F.32 "Vegetation management projects in suitable mountain plover habitat will be designed to maintain or improve mountain plover habitat." Yes, we the people want healthy habitat for plovers, other birds, wildlife. If it is not healthy, maintained or improved, in terms of the plovers, it's not healthy for people. Plovers on habitat are like canaries in coal mines. Keep the bird population healthy and the habitat will be healthy for people.

CHANGE TO: p. 1-17/F.34 "To improve or maintain mountain plover nesting and brooding habitat, vegetation management techniques that enhance short-stature vegetation communities should be considered for use in projects that occur in suitable mountain plover habitat."

KEEP AS IS; p. 1-19/F.62 "To optimize habitat for burrowing owls, manage for active prairie dog colonies that are larger than 80 acres." The proposed change is a loop whole big enough for a herd of cattle to graze through. Don't do it.

KEEP AS IS: p. 1-19/F.63 Coordinate and consult with the appropriate wildlife management agencies and local landowners to prohibit prairie dog shooting in areas where significant risks have been identified for other wildlife species or where shooting is preventing or slowing a desired prairie dog population expansion. Restrictions shall be year-long or seasonal, and dates of seasonal restrictions shall vary depending on the species at risk." I prefer the standard over unscientific anticipation of shooting regulations.

KEEP AS IS: F.65b (as added in Amendment 3, 2009) "Adopt and implement a black-tailed prairie dog management strategy. This strategy is made a part of this plan (Appendix N)." Without strategy any plan is subject to the third party influence, mostly likely the stockgrowing industry, since wildlife won't have a seat at the table.

KEEP AS IS: p. 1-23/H.1 (as revised in Amendment 3, 2009) "Limit the use of rodenticides (grain baits) for reducing prairie dog populations to the following situations:

? Public health and safety risks occur in the immediate area. Standard

? Damage to private and public facilities, such as cemeteries and residences. Standard

? On site-specific colonies where unwanted colonization onto adjacent non-federal lands is occurring and other tools are impractical, ineffective or have been proven to be unsuccessful. Guideline

? Colonies outside Categories 1, 2, 3, and 4 (as identified in strategy) if the Forest

Service determines they are not needed for habitat for prairie dogs, black-footed ferrets or other associated species. Guideline."

Labeling laws in the USA are infamously lax and not sufficient to protect flora or fauna, much less people and private property.

KEEP AS IS: p. 1-23/H.4 (component proposed to move up with numbering changed accordingly) "From January 1 through September 30, don't use rodenticides (above-ground baits) to reduce prairie dog populations. This is necessary to reduce risk to migratory birds. To reduce risk to other wildlife, don't use burrow fumigants in prairie dog colonies." Given the recent scientific study (Science, September 19, 2019) that nearly a third of the total bird population of North America has disappeared since the 1970s, we want to strengthen protections rather than reduce the time period in which birds have protection. The shifting baseline has been one of decline long before the 1970s baseline.

QUESTION CHANGE: H-XX "To avoid bait aversion, rodenticide application should not occur for more than 3 consecutive years in a given location." Why rodenticide at all? Establish a healthy ecosystem with natural checks on population.

Reducing conflict should not apply to livestock grazing on public lands, where the solution is obvious: remove the livestock rather than the public wildlife!