

Data Submitted (UTC 11): 1/7/2020 12:55:21 PM

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Comments: Comments from Longreach Buffalo Company LLC

January 7, 2020

Longreach Buffalo Company LLC appreciates the opportunity to comment on the Draft Environmental Impact Statement for Prairie Dog Management on the Thunder Basin National Grasslands. Longreach Buffalo Company LLC grazes approximately 3,000 acres of national grasslands through its permit with Spring Creek Grazing Association, a separate northern portion of the Thunder Basin National Grasslands.

Comments are shown in reference to the page number of the "Thunder Basin National Grassland 2020 Plan Amendment Draft Environmental Impact Statement".

Longreach Buffalo Company LLC favors Alternative #2, the Proposed Action (page 29), with the following revisions:

Page 32, Prairie Dog Colony Acre Targets and Distribution

Revise the third item, second sentence - remove "visual barriers" as a tool to control growth. Visual barriers may work in South Dakota, but do not work in northeast Wyoming. On the Spring Creek grasslands, we have seen prairie dogs encroach into tall dense stands of big sagebrush and on deeded land have seen them encroach into alfalfa fields. Vegetative visual barriers may work in mid-grass prairies with 20+ inches of precipitation, but in the Spring Creek area it is questionable..... and even more questionable in the Thunder Basin Grasslands area due to lower precipitation than Spring Creek. Visual barriers of other materials such as fabric are aesthetically unappealing and will require continued maintenance.

Page 33, Density Control

We question the use of "satellite colonies" since management of satellite colonies would be very difficult. Trying to create areas on a map of future prairie dog colonies is doubtful.

Page 33, Approved Rodenticides

*Revise the second item to say ".....should not occur for more than 2 consecutive years" rather than 3 consecutive years.

*Revise the third items as follows: Delete "The use of anticoagulant rodenticides and fumigants are prohibited". Insert "Fumigants and anticoagulant rodenticides may be used only in boundary management zones and only after two consecutive applications of zinc phosphide. Fumigants and anticoagulant rodenticides may be used only if applied by a Forest Service-approved contractor (through direct contract or agreement) or Forest Service staff."

Page 33, Recreational Shooting

Recommend that recreational shooting be allowed year-round as the cost and time to enforce a recreational shooting ban on specific areas with irregular shaped boundaries would be prohibitive. Why have a ban you cannot enforce? Also, the effect of shooting is minor on the population.

Page 132, Effects Analysis - Forest Service Sensitive Species, Greater Sage-Grouse

Prairie dogs on the Spring Creek area have shown that as the prairie dog populations increase, they will encroach into sagebrush areas. While a prairie dog population can decrease rapidly due to the plague and then recover rapidly due to prairie dog reproductive capabilities, the sagebrush habitat is much slower to recover. Recommend some prairie dog control be implemented in sage-grouse core areas near leks.

