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Title: Range Manager

Comments: The Spring Creek Grazing Association appreciates the opportunity to comment on the Draft Environmental Impact Statement for Prairie Dog Management on 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".

The Spring Creek Grazing Association favors Alternative #2, the Proposed Action (page 29), with the following revisions:

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 prairie dog populations increase, they will encroach into sagebrush areas, even areas of very tall big sagebrush (Artemesia tridentata). While a prairie dog population can be reduced rapidly due to the plague and then recover rapidly due to prairie dog reproductive capabilities, the sagebrush habitat is much slower to recover. Recommend prairie dog control be implemented in sage-grouse core areas near leks.