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Comments: The Proposed Action: Changes to Grassland Plan Direction document includes numerous alterations in language which are deleterious to the re-introduction and survival of black-footed ferrets (*Mustela nigripes*).

There are 6 instances where the phrase "or thought" is removed from provisions which limit oil drilling and other activities in areas where black-footed ferrets reside. It is very reasonable to ensure protections for black-footed ferrets in areas where they probably reside, but have not been confirmed to live because their nocturnal and burrowing habits make them difficult to spot.

One of these instances is p. 1-15/F.22, which states "For routine maintenance, access to oil and gas facilities in prairie dog colonies occupies 'or thought to be occupied' by black-footed ferrets should be limited to daylight hours. This does not apply to emergency repairs." (Emphasis mine.)

The proposed action removes the phrase, "or thought to be occupied" from the existing component. This would allow for routine repairs of facilities in prairie dog towns where black-footed ferrets have not been confirmed to reside to be completed at night, significantly increasing the chance of vehicle collisions.

The black-footed ferret is one of the rarest mammals in North America. It is estimated that there are only approximately 300 wild black-footed ferrets alive today. By comparison, the Snow Leopard Conservancy estimates that 4,500-7,500 snow leopards are alive in the wild. Their population was, at one point, less than 20 individuals, and their genetic diversity is so low that zookeepers must plan almost every pair to prevent inbreeding. Even the death of a handful of individuals is devastating for the species' genetic health.

This also is not a good deal for oil or gas workers. Who wants to go to court for running over one of the rarest mammals in North America?

For the final plan amendment should NOT include removals of the "or thought" language pertaining to black-footed ferret habitat. They would permit more destructive activities in their habitat, whether it be through destruction of grassland or significantly increasing their chances of being hit by vehicles. Rules like this don't exist to annoy responsible people, but to prevent irresponsible people from cutting corners and harming people and wildlife through their negligence.

In addition, management of prairie dog colonies should emphasize large colonies suitable for their reintroduction, not larger amounts of smaller colonies which cannot support them.

The black-footed ferret is one of the few happy stories of conservation, of a species rescued from the jaws of extinction by international collaboration, private-public partnerships, and advances in wildlife biology. It is a beacon of hope to endangered species throughout the world, including a quarter of all mammal species. Unnecessary alterations like these douse these embers before they can light the torch forward.

As Theodore Roosevelt once wrote, "The civilized people of today look back with horror at their medieval ancestors who wantonly destroyed great works of art, or sat by slothfully by while they were destroyed. We have passed that age, but we are, as a whole, still in that low state of civilization where we do not understand that it is also vandalism wantonly to destroy or to permit the destruction of what is beautiful in nature - whether it be a cliff, a forest, or a species of mammal or bird."