

Data Submitted (UTC 11): 1/9/2020 7:07:21 PM
First name: Jennifer
Last name: Hart
Organization: Campbell County Conservation District
Title:
Comments:

January 9, 2020

Thunder Basin Plan Amendment Comments
Medicine Bow-Routt National Forests and Thunder Basin National Grassland Supervisors Office
2468 W. Jackson Street
Laramie, WY 82070

Re: Thunder Basin National Grassland 2020 Plan Amendment, Draft Environmental Impact
Statement #55479

Dear Forest Supervisor Bacon,

The Campbell County Conservation District (CCCD) appreciates the Forest Service's continued efforts to address concerns on the Thunder Basin National Grasslands (TBNG). As an active participant throughout this process, CCCD is encouraged by the plan amendment and its potential to address some of the concerns on the TBNG. The CCCD would like to respectfully submit the following comments on the Thunder Basin National Grassland 2020 Plan Amendment, Draft Environmental Impact Statement. Our comments are specific to our mission: To provide leadership for the conservation of Campbell County's soils and water, protect the agricultural resource base, promote the control of soil erosion, promote and protect the quality and quantity of Campbell County's water and all other natural resources, preserve and enhance wildlife habitat, protect the tax base and promote the health, safety and general welfare of the county through responsible conservation ethic.

The CCCD is in support of the main concepts of the proposed action, Alternative 2, with some amendments, which we believe will provide of the maximum benefit to the grasslands while creating flexibility that will allow the USFS to properly implement the conservation measures within the plan. Our organization supports the emphasis on rangelands with short-stature vegetation and the emphasis in the Cheyenne River Zoological on riparian habitat that is included in Alternative 2.

Pg. 33, Alternative 2- Proposed Action, Density Control

While the CCCD appreciated the improvements to the satellite concept in Alternative 2, the USFS should consider adding a minimum colony size to aid in the designation of these areas. The CCCD suggests setting a

colony range of 200-500 acres . This number is based on the minimum amount of acres needs for associated species. This will ensure that the satellite areas are providing benefit to the grasslands and are not randomly assigned throughout the grasslands to only reach control numbers. Once designated as a satellite colony, the CCCD supports density control as well as lethal control should the colony expand beyond its size at designation.

Pg. 33, Alternative 2- Approved Rodenticides

In order to provide managers with the flexibility to respond to changing conditions on the TBNG it is imperative that control options are not limited. The CCCD appreciates the use of the USFS's inclusion, in Alternative 2, of control options including: recreational shooting, rodenticide, translocation, and fumigants. However the CCCD encourages the USFS to expand controls further. The approved lethal control of Zinc phosphate is just one option and due to labeling restrictions is only available for use one time per year. Although fumigants have been included, in Alternative 2, it is important to note that this treatment option is extremely labor intensive and the most costly option. With the limited resources available to the USFS, for management, it is important that other options are included so that treatments can be realistically implemented in a reasonable time frame. Land managers across the TBNG have seen first-hand how quickly prairie dog populations can escalate. For this reason the CCCD encourages the USFS to re-examine the use of anticoagulants as an option should other options be unsuccessful.

Pg. B-1, Appendix B: Proposed Approaches to Prairie Dog Management, Collaborative Stakeholder Groups

The CCCD appreciated the inclusion of a collaborative stakeholder group and supports the use of such a group moving forward. If this group is well constructed it will aid in the affective implementation of this plan for years to come. However it is imperative that the structure and interaction with this collaborative stakeholder group be well thought out and articulated in this document. In the second paragraph of this section it states that the "...responsible official will meet with the collaborative stakeholder group or representatives a minimum of once per year..." The CCCD would suggest that the responsible official meets with the stakeholder group quarterly. By meeting with a higher frequency the responsible official will be able to be apprised of planning, surveys, treatments, and results. This will aid in the official's ability to properly implement this plan.

The CCCD encourages the USFS to add language that clearly defines the stakeholder group its' function and make up. The document currently states that the stakeholder group would be composed of "...state and local agencies, educational and research institutions, ranching groups, grazing association members, environmental organizations, individuals with expert knowledge on topics such as range and wildlife management, private landowners, and other interested parties." This list of potential participants should also include local governments as local agencies may not be interpreted to include counties and municipalities. The CCCD also believes that this section could be strengthened by adding that the stakeholder group should be composed of a representative group comprised of "...state and local agencies, [local governments,] educational and research institutions, ranching groups, grazing association members, environmental organizations, individuals with expert knowledge on topics such as range and wildlife management, private landowners, and other interested parties." that are also balance geographically across the grasslands. Spending time on the composition of this collaborative stakeholder group will allow for equitable distribution of limited resources during plan implementation. This collaborative group could have additional oversight with the use of an interdisciplinary team. This structure could be similar to Wyoming's Sage Grouse Implementation Team process .

Pg. B-4, Prairie Dog Density Control

In order to properly implement this plan, emphasis should focus on the vegetation present in the TBNG. The CCCD appreciated the incorporation of ecological site description within this amendment. This method will provide the USFS with a realistic idea of what the various ecological sites across the grasslands are capable of producing. This knowledge will allow the USFS to establish thresholds for acceptable levels of vegetation and

create triggers for control of prairie dogs, both lethal and density.

The CCCD appreciates the opportunity to comment on the draft environmental impact statement document and looks forward to meaningful engagement with the USFS and TBNG stakeholders. The CCCD supports the proposed action with amendments to increase flexibility and appreciates the effort put forth by the USFS to reach a solution that will benefit the resources and the multiple uses of the Thunder Basin National Grasslands.

Sincerely,

Jennifer Hart
District Manager
Campbell County Conservation District

Cc: Wyoming Association of Conservation Districts
Campbell County Commissioners
Wyoming Department of Agriculture
Converse County Conservation District