

Data Submitted (UTC 11): 1/9/2020 10:00:00 AM

First name: Holly

Last name: Kennedy

Organization: Wyoming Farm Bureau

Title: Field Services & Federal Lands Assoc.

Comments: Please see attached comment letter.

The Wyoming Farm Bureau Federation is commenting on behalf of over 2,600 agricultural producer members in the state of Wyoming. Many of our members have specific interest in how the Thunder Basin National Grasslands (TBNG) are managed and all of our members are vested in the management of lands under the Forest Service (FS) umbrella. The current management scenario in TBNG of Management Area 3.63 (MA), the Black-footed Ferret Reintroduction Habitat, is both untenable and unsustainable. We support components of both Alternative 2 and 3. We do not and cannot support Alternatives 1 or 4.

When looking for implementable solutions to improve the management of the TBNG we would encourage the FS to recall the foundational principles upon which the TBNG were established. Under the Bankhead-Jones Act these lands were established as a site for grasslands agriculture. Furthermore, the FS itself is nestled under the umbrella of the United States Department of Agriculture. Yet, this agricultural focus often seems lost to the demands of special interests. While we realize the FS is caught in a scenario where they must consider many interests, they should not forget their principal charge.

Areas of Support & Concern

Socio-Economic Impacts

We are concerned by the lack of socio-economic impact analysis to date. We feel more emphasis should be placed on how these management scenarios and decisions will affect local economies and individual operations.

Rangelands with Short Stature Vegetation Emphasis

We are concerned that through this process the FS has shifted away from the highly supported "rangelands with short stature vegetation" emphasis back toward a focus that attempts to manage a species that is not federally listed. This rangeland focus better aligns with fulfilling the Forest Service's mission of managing lands; not species. All management goal references to "prairie dog colonies" or "acres of prairie dogs" should be changed to "acres of short stature vegetation" or similar habitat focused language. Acreages counted toward this goal should be based off of landscape and vegetative composition, not solely presence of prairie dogs. This supports a landscape scale approach that benefits multiple species and the landscape as a whole.

Control Methods

The Forest Service must be given more tools and funding for said tools if this Plan Amendment is to successfully change on ground conditions. We support additional methods of lethal control being made available for use. We can only support non-lethal control methods being used if FS funds and personnel not used to implement or maintain them. We want to be clear that our support is only for the allowance of these nonlethal projects to occur. Additionally, we do not support any kind of shooting ban or restriction.

Drought Reductions

We support reducing acreage goals during times of drought.

We support removing references to the 2015 Black-tailed Prairie Dog Conservation Assessment and Management Strategy.

Density Control

We whole heartedly support density control and believe this can be used to reduce impacts to the landscape while still maintaining areas of short stature vegetation to meet FS management goals.

Stakeholder Group

We support a stakeholder group being formed and utilized to inform management decisions. We would recommend the groups that have been heavily involved in the working group effort prior to this Plan Amendment should comprise the initial group. We cannot stress enough the importance of the inclusion and involvement of area landowners, who are both the most heavily impacted and often the most in tune with on ground situations. As such, their interest should be more heavily weighted than that of other parties.

Cheyenne River Special Interest Area

We support changing both the focus of and the boundaries of the Cheyenne River Special Interest Area. We support the Alternative 3 proposed Boundary that follows both the Cheyenne River and Antelope Creek. We cannot and will not support any proposed reductions to grazing use or stocking numbers as a result of this change to a riparian focus.

Boundary Management Zones

We support the implementation of Boundary Management Zones (BMZ's). We feel that these should be a minimum of $\frac{1}{2}$ mile and should be able to be increased up to one mile in areas that have been problematic in the past. We feel that area 3.67 should have BMZ's permanently in place. We also feel that throughout the TBNG landowners should be able to request temporary BMZ's in problematic areas where encroachment onto adjacent Private and State lands is occurring. All residences within the TBNG should have a minimum of a one mile BMZ permanently in place.

Acreage Goals

We feel that all acres of short stature vegetation across the TBNG should count toward management goals. For this reason, we support the concept of Alternative 3. We support managing for a set acreage of short stature vegetation within 3.67 however, 10,000 acres is wholly inappropriate. Additionally, as shown by trend data (as detailed on page 6 of this DEIS), it is unachievable in most years. We feel 3,000 acres within 3.67 is a more appropriate goal. Furthermore, we feel that grasslands wide the goal should contain a maximum acreage if it is going to contain a minimum. We feel that 10,000 acres should be the maximum number of acres grassland wide.

Designated Complex

IF there is a designated complex, it should be very carefully chosen with some of the following considerations: natural barriers, proximity to the Special Interest Area, proximity to non-federal lands, avoidance of known problematic areas, adjacency of residential buffers, ecological site descriptions, etc. Our recommendation would be that this complex may be best accepted within the rest pastures.

Size of Short Stature Vegetation Areas

We support managing for areas of short stature vegetation that are 200 - 500 acres in size. We feel this meets habitat goals for several species while reducing negative impacts to the landscape. Attention should still be given to density and the availability of forage and composition of plant species within these colonies.

Pasture Design

We would support this area being exempt from fence line or other restrictions that may inhibit the ability to change the level of burden placed on areas within the MA. We question if the focus on

increasing pasture sizes perhaps shifts decisions in a direction that places scenic values over utilizing best management practices to ensure optimum rangeland management.

Livestock Management/Forage Allocations

We believe the ability to utilize livestock timing, density, etc. to enhance desired conditions on the ground may currently be underutilized. FS should work with the grazing associations and landowners to identify potential opportunities. We believe an approach similar to the Bureau of Land Management's Outcome Based Grazing might be well suited to this scenario. We wholeheartedly support using rangeland health to drive management decisions.

Funding

We feel that the ultimate success of this Plan Amendment depends on adequate and consistent funding. The FS must do everything possible to allocate and prioritize funding to implement both proactive and reactive management strategies.

In Conclusion

We feel that the incorporation of these suggestions and concepts can provide a potential path forward that will bring relief to adjacent landowners, lessees, and the rangeland itself. We feel that combining the above suggestions into a blended option from Alternatives 2 and 3 provides the best path forward. We look forward to engaging in future management discussions on the TBNG and in the Plan Amendment process.