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Organization:

Title:

Comments: Dear Thunder Basin Grasslands,

Wildlands Defense strongly opposes the limited range of alternatives and overwhelming reliance on shooting and poisoning Prairie Dogs in the proposed Thunder Basin Plan.

We believe the USFS must go back to the drawing board and develop a plan that adequately takes into account the adverse impacts of continued domestic livestock grazing across all USFS lands, and accurately details the serious adverse ecological impacts of continued grazing.[comment end] [comment:120-3]These are made worse by climate change stresses. See Beschta et al. 2012, Belsky and Gelbard (2000), Fleischner 1994. Increased site drying and desertification, more extreme weather, less natural ecological resiliency are all predicted kWh climate change, and grazing aggravates this. Livestock grazing spreads exotic species and alters native ecosystems.

The use of poisons on the Grasslands is entirely unacceptable. A new range of alternatives based unapplying non-lethal methods must be examined in a Supplemental EIS.

Full and detailed site-specific baseline inventories must be conducted for all species that inhabit and/or migrate through the Grasslands, and the magnitude of effects of this outright poisoning with rodenticides, and lead poisoning from shooting, must be fully assessed.

Three billion birds have vanished form North America. See Rosenberg et al 2019. The Grasslands must be managed to aid in restoration of native fauna, not poisoning it with rodenticides and lead. This is necessary to comply with NFMA, and to sustain a broad spectrum of sensitive species and migratory birds.

Full and detailed analysis must take place, and a suitable plan to address the climate crisis, the biodiversity crisis, and recover avifauna on these publicly owned lands must be developed.

References Attached

Beschta et al. 2012

Fleischner__Ecological Costs of Livestock Grazing in Western North America

Belsky Gelbard_2000 Livestock Grazing and Weed Invasion in the Arid West

Rosenberg et al 2019