



*The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.*

January 9, 2020

Monique Nelson  
Planning Team Leader  
U.S. Forest Service  
2468 Jackson Street  
Laramie, WY 82070

Dear Ms. Nelson,

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Draft Environmental Impact Statement on the Thunder Basin National Grassland 2020 Plan Amendment.

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As the proposed action affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

The 2012 United States Forest Service (USFS) Planning Rule requires the USFS to "maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds in the plan area" (§ 219.9(a)(1)), and to "maintain or restore the diversity of ecosystems and habitat types throughout the plan area" (§ 219.9(a)(2)). The provisions outlined in this amendment along with implementing our recommendations will assist the USFS meet this mandate through a habitat-based approach across the Grassland.

WDA supports the shift in emphasis in this Amendment from single-species management to a habitat-based approach. We feel this approach to be more closely aligned with the USFS legal authorities and mandates. In our review of the proposed Amendments, WDA supports Alternative 2 - Proposed Action with the following recommendations:

- **Management Area 3.63 and the Cheyenne River Zoological Special Interest Area**
  - WDA supports the change of Management Area 3.63 to Management Area 3.67 - Rangelands with Short Stature Vegetation Emphasis including the reduction in size.
    - This approach supports the USFS direction to shift the management emphasis away from single-species to habitat-based.
  - WDA encourages the FS to consider the inclusion of Antelope Creek in the Cheyenne River Zoological Special Interest Area.
  - WDA supports the change to the Cheyenne River Special Interest Area to a riparian emphasis.
  - WDA does not support the expansion of Management Area 3.63 to incorporate more areas having the potential to grow prairie dogs. Expanding the Management Area will increase the total acres, but will impact potential resources to control prairie dogs.

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- **Prairie Dog Colony Acre Targets and Distribution**
  - WDA supports the management of prairie dog colonies to a target of 10,000 acres.
  - Lethal management controls, except for density control, within Management Area 3.67 would be available when total active prairie dog acres grassland wide exceed 10,000 acres.
  - WDA does not support any designation of satellite acreages or associated restrictions.
  
- **Grassland Wide Components**
  - Manage active prairie dog colonies to a target of 10,000 acres grassland wide, including in management area 3.67.
  - Account for active prairie dog colonies meeting identified suitable habitat minimum of 200 acres for associated species habitat, including but not limited to burrowing owl and mountain plover, and are outside any designated boundary management zone. These colonies would count towards the 10,000 acre target.
    - This ensures active prairie dog colonies provide suitable habitat for the associated species across the national grassland/planning unit.
    - The accounting methods aligns with a habitat based management approach.
    - Acres counted outside of Management Area 3.67 meeting the minimum of 200 acres will have no additional protection/restrictions placed upon them.
  - When the grassland wide target of 10,000 acres is met, implement any control measures within management area 3.67.
  - No treatment would occur when active prairie dog acres are verified below 3,000 acres within management area 3.67 except for boundary management zones.
    - 3,000 acres of active prairie dog colonies meets the minimum criteria for two black footed ferret reintroduction sites found in the Wyoming Game and Fish Department's Black Footed Ferret reintroduction plan.
  - The grassland wide components meet the intent of the 2012 Planning Rule and 36 CFR 219.8 (Sustainability) and 219.9 (Diversity of Plant and Animal Communities). Management of ecosystem characteristics across the grasslands by maintaining and restoring ecological integrity and ecosystem diversity.
  - WDA does not support the designation of complexes throughout the grasslands.
  - WDA does not support an increase to 15,000 acre targets of active prairie dogs.
  
- **Boundary Management Zones**
  - WDA supports control of prairie dogs within 1 mile of residences as a high priority for human health and safety.
  - WDA supports that a one-quarter-mile boundary management zone in Management Area 3.67.
    - Upon request or following prioritization recommendations by the Collaborative Stakeholder Group, a one-quarter-mile boundary management zone may be established outside of the management area.
  - WDA supports the establishment of a three-quarter-mile boundary management zone upon request.

- **Thresholds for Rodenticide Use**
  - All prairie dog control tools not otherwise restricted by this plan would be available for use in management area 3.67 when total active prairie dog colonies grassland wide reach 10,000 acres.
  - All prairie dog management tools not otherwise restricted by this plan would be available for use outside of management area 3.67 at any time.
  - When the total prairie dog colonies grassland wide are below 10,000 acres all lethal control tools in management area 3.67 would not be used except in boundary management zones and for density control.
  
- **Density Control**
  - Utilize density control measures across the grassland, including Management Area 3.67.
  - Utilize density control when desired vegetation conditions are not met.
  - WDA supports pretreatment data collection and monitoring in areas where density control measures are used.
  
- **Approved Rodenticides**
  - WDA supports all forms of zinc phosphide approved for use in Wyoming be available for use.
  - Utilize fumigants and anticoagulant rodenticides in boundary management zones and for density control after two applications of zinc phosphide rodenticides, to avoid bait aversion and give land managers as many tools for control as possible.
  - Include all future lethal treatment options when approved for use on the grasslands.
  
- **Recreational Shooting**
  - Remove all restrictions on recreational shooting grassland wide.
    - *"Recreational shooting is only moderately effective in the management of prairie dogs but only on a small scale and is not practical or cost effective as dogs often become gun-shy."* (Barbalace 2007a)
    - Limiting recreational shooting may have a detrimental effect on the local economy.
  
- **Drought Plan**
  - WDA supports the temporary reduction in target acres of active prairie dog colonies during drought conditions.
  
- **Plague Management**
  - Utilize plague management control treatments only when prairie dog colonies are below 10,000 acres across the grassland.
    - Once target ranges are met, all prairie dog control tools are available for use making plague management unnecessary.
  - Utilize the Collaborative Stakeholder Group to prioritize when and where to implement plague management control tools.

- **Management Strategy and Collaborative Stakeholder Group**
  - WDA supports the development of a Collaborative Stakeholder Group to provide management recommendations to the Forest Service.
  - The Collaborative Stakeholder Group will assist in annual prioritization of treatments, type of treatment, monitoring and potential funding for the entire grassland.
  - Monitoring within Management Area 3.67 will take precedence over requests for monitoring outside Management Area 3.67.
  - Areas outside Management Area 3.67 meeting the minimum of 200 acres can be brought to the Collaborative Stakeholder Group to be considered to count towards the 10,000 acre target.
    - Based on meeting the minimum of 200 acres the Collaborative Stakeholder Group will evaluate verify and recommend prioritization for future monitoring.
  - Based on landowner requests the Collaborative Stakeholder Group would advise treatment recommendations, including designated boundary management zones outside of 3.67, to the USDA.
  - We encourage landowner or grazing permittees to assist in monitoring and reporting active prairie dog colonies throughout the grassland.
  
- **WDA does not support Alternative 1 - No action or Alternative 4 - Prairie Dog Emphasis Alternative.**

WDA appreciates the USFS analysis of prairie dog impacts to available forage and believe it demonstrates the differences in potential impacts across alternatives. Identifying and acknowledging the competition between prairie dogs and other grazers is key to formulating a sound management strategy for future sustainability.

Thank you for the opportunity to comment and WDA looks forward to working with you on this important endeavor. If you have any questions or concerns please do not hesitate to contact us.

Sincerely,

  
for/ Doug Miyamoto  
Director

DM/sm

CC: Governor's Policy Office  
Wyoming Board of Agriculture  
Wyoming Stock Growers Association  
Wyoming Wool Growers Association  
Wyoming Farm Bureau Federation  
Wyoming State Grazing Board  
Wyoming Association of Conservation Districts  
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