



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

December 31, 2013

Medicine Bow-Routt National Forests and Thunder Basin National Grassland
Attention: Responsible Official
Douglas Ranger District
2250 East Richards Street
Douglas, WY 82633

To Whom It May Concern:

Following are the comments of the Wyoming Department of Agriculture (WDA) pertaining to the Medicine Bow-Routt National Forests and Thunder Basin National Grassland proposal to amend the 2001 Grassland Plan and 2009 Prairie Dog Management Strategy (Amendment).

Our comments are specific to our mission within state government: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this amendment impacts our agriculture industry, our natural resources, and the welfare of our citizens, we believe it is important you continue to inform us of proposed actions and decisions and continue to provide us the opportunity to express pertinent issues and concerns.

We appreciate the opportunity to provide scoping comments for the Amendment and in support of the Proposed Action. We offer the following comments regarding the Amendment and the Proposed Action.

WDA supports an adaptive management approach to the Proposed Action. We believe the future success of the Amendment will hinge upon the US Forest Service's (USFS) ability to work cooperatively with the State of Wyoming, private landowners, grazing permittees, and wildlife agencies. An adaptive management approach will allow the USFS to adjust management practices cooperatively on a case-by-case basis.

An adaptive management approach should include the use of any Environmental Protection Agency approved rodenticides. As new chemicals are tested and approved or new scientific data proves chemicals do not cause cumulative impacts to other species, the USFS can permit the use of these chemicals without future amendments or reinitiating the National Environmental Policy Act.

The Proposed Action on page 9 of the Scoping Document states in point two: *"Modifying existing management tool options to allow shooting and the use of rodenticides, including anticoagulant rodenticides, within the ¼ mile buffer"* but further down the document states: *"The Forest Service met with the State of Wyoming to clarify elements of the proposal. Based on those discussions, it was determined*

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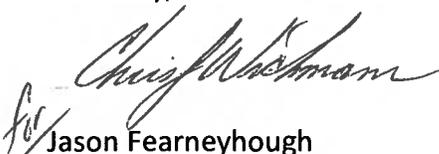
that acceptable management tools could include: approved rodenticides (zinc phosphide)..." We urge the USFS to ensure the Proposed Action is not limited to zinc phosphide or conflicts with point two.

WDA recommends the USFS provide clarification on bullets two and four of the 2009 Prairie Dog Management Strategy. We believe the Proposed Action should simply reference the Wyoming Game and Fish Department's Translocation Policy and not identify specifics. If the Translocation Policy were to change, the Management Plan could adjust accordingly. The fourth bullet discusses elimination of designated control colonies. We insist the USFS ensures this is clearly explained and there is consensus of the intent behind the elimination.

We appreciate the USFS' willingness to address these highly controversial issues and believe the Amendment can bring federal, state, and private landowners together while meeting a mission to achieve multiple use objectives.

If you have further questions, please feel free to contact us.

Sincerely,



Jason Fearneyhough

Director

JF/jw

CC: Governor's Policy Office
Wyoming Board of Agriculture
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