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THUNDER BASIN NATIONAL GRASSLAND

## Consideration of Comments for the Permanent Seasonal Prairie Dog Hunting Order Thunder Basin National Grassland

### Comment Period

The 60-day comment period for the proposed permanent seasonal hunting order closure on Thunder Basin National Grassland began on August 18, 2022.

### Parties Responding to Comment Period

The Forest Service received three comments from individuals and organizations, all of which were received after the conclusion of the 60-day comment period. All three commenters stated support for the Record of Decision for the 2020 Plan Amendment, which includes a standard regarding shooting of prairie dogs. The comments address two main topics: different types of prairie dog hunting prohibitions - including no prohibition and year-round prohibitions, and review of county land use plans. The Forest Service previously analyzed these issues during the Plan Amendment process in response to similar comments submitted by these commenters. The commenters included organizations that were either cooperating agencies and/or part of the collaborative working group during the Plan Amendment process. The Forest Service continues to collaborate with the Thunder Basin Working Group on implementation of the Plan Amendment, taking into consideration the diverse stakeholder interests represented in that group.

### Extent of the Closure and Time Period of Closure

The 2019 John Dingell Jr. Conservation, Management and Recreation Act requires all federal land management agencies to provide public notice and comment before issuing a hunting, fishing, or recreational shooting order. The Dingell Act also stipulates in Sec. 4103(a)(2) that any area designated for a shooting closure be the smallest area that is required for public safety, administration, or compliance with applicable laws.

The final permanent order prohibits the hunting of prairie dogs in Management Area (MA) 3.67 from February 1 to August 15 of each year. The forest decided on the final closure area based on numerous factors analyzed in the 2020 Plan Amendment. A standard created by the Plan Amendment requires seasonal prohibition of prairie dog hunting in MA 3.67 to protect at-risk species associated with prairie dog colonies. This permanent seasonal hunting order implements this Plan Amendment standard. The size of the closure area is limited to the minimum necessary to implement the direction in the Plan Amendment.

**Table 1: Parties Who Responded**

Jim Willox, Converse County Board of Commissioners
Del Shelstad, Campbell County Board of Commissioners
Chamois Andersen (Defenders of Wildlife), Kristy Bly (World Wildlife Fund), Steve Forrest (Independent Consultant)

**Table 2: Comment Analysis & Response**

ISSUE/CONCERN	RESPONSE
<b>CLOSURE TIME FRAME</b>	
<p><b>#1. Permanent Year-Round Closure:</b>  <i>One commenter suggested:</i></p> <ul style="list-style-type: none"> <li><i>the Forest Service should secure a permanent year-round prohibition in MA 3.67 for black-footed ferret recovery.</i></li> </ul>	<p>The FEIS for the Plan Amendment analyzed several alternative structures for hunting prohibitions, including year-round hunting prohibitions on portions of the grassland in the prairie dog emphasis and no-action alternatives, and concluded that all alternatives – including a seasonal hunting prohibition – would provide the biological requirements for black-footed ferret recovery. Allowing hunting year-round outside of management area 3.67 and inside of management area 3.67 between August 16 and January 31 balances the environmental benefits of a seasonal hunting prohibition with the recreational opportunities and their associated local economic benefits. In addition, the Dingell Act requires the agency to “designate the smallest area for the <i>least amount of time</i> that is required for public safety, administration, or compliance with applicable laws.” This closure meets those requirements.</p>
<p><b>#2: Closure Should Not Be Permanent:</b>  <i>Two commenters suggested:</i></p> <ul style="list-style-type: none"> <li><i>the Forest Service should allow hunting when population levels reach a certain threshold</i></li> <li><i>no credible scientific data to support a permanent or otherwise order is necessary.</i></li> </ul>	<p>Prohibiting the hunting of prairie dogs protects other species in the area and allowing hunting when prairie dog populations reach a certain threshold would not address the effects of hunting on these other species. In addition, the Forest Service will continue to monitor, inventory, and map prairie dog populations. The best available scientific information supporting a permanent seasonal hunting prohibition is part of the record for the Plan Amendment, including Appendix E of the FEIS. This scientific data is incorporated by reference into the record for this order.</p>

**Table 2: Comment Analysis & Response**

ISSUE/CONCERN	RESPONSE
<b>COUNTY LAND USE PLANS</b>	
<p><b>#2. County Land Use Plans:</b> <i>Two commenters encouraged the Forest Service to conduct a consistency review with County Land Use Plans that were updated in September 2022.</i></p>	<p>These comments request the incorporation of updates that occurred after the order was proposed and after the initiation of the comment period. The Forest Service considered the management plans of local and State governments and agencies, including county land use plans, when developing the plan amendment. A full consistency review of the plan amendment with county land use plans was completed as part of the analysis to understand areas of agreement and disagreement within the scope and scale of the plan amendment and is detailed in Appendix F of the FEIS. Where these plans did not conflict with Federal law or Forest Service purview, the Forest Service made every effort to harmonize the preferred alternative with local laws and plans and discuss any inconsistencies between the preferred alternative and local plans. These comments did not identify any updates to the county land use plans that are relevant to the prairie dog hunting prohibition.</p>

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