



**Western
Watersheds
Project**

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Working to protect and restore Western Watersheds

Russ Bacon

Forest Supervisor

2468 Jackson Street

Laramie, WY 82070-6535



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Working to protect and restore Western Watersheds

Russ Bacon
Forest Supervisor
Medicine Bow – Routt National Forest/Thunder Basin National Grassland
2468 Jackson Street
Laramie, WY 82070-6535

September 5, 2018

Dear Supervisor Bacon:

I am writing to express our dismay at efforts by livestock grazing permittees on the Thunder Basin National Grassland to advocate for greater poisoning of black-tailed prairie dogs and abandonment of black-footed ferret recovery efforts on the Thunder Basin. As a direct result of efforts by the livestock industry to weaken protections for prairie dogs and frustrate the return of the indigenous black-footed ferret on the Thunder Basin, I have been instructed to increase our scrutiny of livestock grazing leases and activities in this area and to ramp up our advocacy on behalf of prairie dog and black-footed ferret recovery efforts.

The black-tailed prairie dog is considered a “keystone species” for shortgrass and mixed-grass prairie ecosystems, forming a key food source for numerous species including swift foxes and birds of prey, and creating unique habitat features that are relied upon by a variety of rare native wildlife including, most notably, the burrowing owl which prefers to nest in active prairie dog towns. The black-tailed prairie dog is a Region 2 Sensitive Species, is valued as native wildlife by the public, and as a linchpin of grassland wildlife assemblages, should not be targeted for lethal control for any reason on federal public lands. Such livestock permittees who find it necessary to kill of native wildlife to advance their own profit motives should be encouraged by the Forest Service to remove their livestock from public lands and find private pasturage instead, so they will not create conflicts for native wildlife on the public lands.

The black-footed ferret is an obligate predator of prairie dogs, and lives exclusively in active prairie dog colonies. Ferrets are native to the Thunder Basin National Grassland, and we believe the Forest Service has a legal and moral obligation to provide sufficient habitat for this species on the Thunder Basin.

WWP strongly supports the Black-footed Ferret Reintroduction Habitat (MA 3.63) designation in the Thunder Basin Grassland Land and Resource Management Plan, and furthermore urges the Forest Service to maximally implement the recovery and expansion of black-tailed prairie dog colonies both inside and outside this zone, with the goal of creating an adequate acreage of contiguous (within 7 km of each other) and occupied prairie dog colonies on the Thunder Basin national Grassland to support the reintroduction of the endangered black-footed ferret.

It has been a while since we last talked, just before you left Kemmerer. In recent years, the Thunder Basin National Grassland has received a lesser amount of attention so we could focus on other priority issues. Both myself and WWP's Executive Director, Erik Molvar were deeply disturbed by efforts by Karen Budd-Falen and area permittees to pressure the Forest Service into reneging on direction for prairie dog management emphasis areas on the National Grasslands.

It is our understanding that captive ferrets are living out their lives and dying in captive facilities for a lack of prairie dog colonies of sufficient expanse. Because of the widespread (and indefensible) use of zinc phosphide, Rozol, and other poisons, black-tailed prairie dogs remain limited to about 5% of their historic natural range. Public lands managed by the Forest Service and other federal agencies, with their multiple-use mandates, provide the strongest candidates for prairie dog expansion, and ultimately, for black-footed ferret reintroduction. Prairie dogs should not be poisoned here.

As a result, I plan to ramp up WWP's oversight program of Thunder Basin National Grasslands livestock management program. Please double-check to ensure that I am listed as an interested party to receive notifications of any and all NEPA processes regarding livestock grazing lease renewals, livestock-related infrastructure projects, and vegetation treatment projects that could affect both native wildlife and livestock grazing. Next week, I will begin by submitting a FOIA to refresh our records regarding livestock grazing and prairie dog management issues.

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jonathan B Ratner". The signature is fluid and cursive, with the first name "Jonathan" written in a larger, more prominent script than the last name "Ratner".

Jonathan B Ratner
Director – Wyoming Office