



United States Department of the Interior



FISH AND WILDLIFE SERVICE Mountain-Prairie Region

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MAY 3 0 2017

Mr. Brian Ferebee, Regional Forester
United States Forest Service
1617 Cole Boulevard, Building 17
Lakewood, Colorado 80401

Dear Mr. Ferebee:

Thank you for visiting with me on May 16, 2017, regarding concerns related to black-tailed prairie dog population expansion at Thunder Basin National Grasslands (TBNG) in northeastern Wyoming.

The U.S. Fish and Wildlife Service (Service) appreciates the Forest Service's conservation efforts for many wildlife species on these unique lands. The TBNG is one of the few large grassland properties in federal ownership with extensive black-tailed prairie dog populations. Prairie dog concentrations as they exist at TBNG are exceedingly rare and are a haven for golden and bald eagles, other raptors, as well as mountain plovers, burrowing owls, swift fox, and other species of conservation concern. Of particular interest, TBNG is a site that has high potential to contribute to the recovery of the endangered black-footed ferret (ferret). While there are currently no immediate plans to reintroduce the ferret at TBNG, it may well be the best existing site across the species' range in 12 western states, Mexico, and Canada that could significantly contribute to its recovery at the present time.

I understand that your consideration of various stakeholder interests at TBNG, as well as current vegetation and drought conditions, may prompt a revision of the current TBNG Grassland Plan to address reduction of prairie dog populations while still potentially contributing to migratory bird conservation and endangered species recovery. I look forward to providing Service input regarding how compromise might be achieved among all interests and still allow the TBNG to contribute to the Forest Service's responsibilities.

In the short term, however, I feel compelled to advise you of the Service's significant concerns regarding the use of anti-coagulant toxicants for prairie dog control including, but not limited to, brand names Rozol and Kaput. I understand that these products have been approved for use by the Environmental Protection Agency and by some State Government entities; however, I have

attached references with summary highlighted concerns of various agencies and other parties related to migratory birds as well as ferrets. In particular, the Service's experience is that the product label requirements are inadequate to limit secondary poisoning of non-target animals and that full label instruction compliance may be limited in practice. Moreover, the use of these products is more expensive and is no more efficient than the use of other products.

You will note in some of the enclosed references that the secondary poisoning of federally protected species continues to occur where anti-coagulant toxicants are used for prairie dog control. While the Service recognizes the need for prairie dog control at TBNG, I urge you to consider less environmentally harmful products in any revised management actions.

As mentioned above, I will reach out again to share Service perspectives about TBNG Grassland Plan changes. Thank you for your consideration of our joint wildlife conservation interests. If you have any questions concerning this matter, please contact Michael Thabault, Assistant Regional Director for Ecological Services, at (303) 236-4210.

Sincerely,

A handwritten signature in blue ink, reading "Norman E. Walsh". The signature is written in a cursive style with a large initial "N".

Regional Director

Enclosures (8)