

Report from the Burrow

Forecast of the Prairie Dog



A Report from WILDEARTH GUARDIANS

By Dr. Lauren McCain

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MISSION STATEMENT

WILDEARTH GUARDIANS protects and restores the wildlife, wild places and wild rivers of the American West.

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REPORT FROM THE BURROW 2009: FORECAST OF THE PRAIRIE DOG

This year, on Inauguration Day, we begin a new era that more broadly defines who can achieve the American dream. Two weeks later, a nation of prairie dogs hopes for a small piece of that dream by sharing Groundhog Day with their famous cousins—by celebrating Prairie Dog Day.



Black-tailed prairie dog. © R. Reading

On February 2nd, WildEarth Guardians and other friends of prairie dogs continue creating a new era of renewal and safety for prairie dog colonies. The animals have suffered greatly during previous administrations. While groundhogs are occupied with seeing their own shadows, prairie dogs face the shadow of destruction—in the form of bulldozing, shooting, poisoning, and many other threats. Prairie dogs are vigilant about protecting themselves from natural predators – scanning their surroundings and warning their colony mates of danger – but they need your help to survive more overwhelming hazards posed by humans.

This particular Prairie Dog Day of Monday February 2nd, the human friends of the prairie greet the colony-dwellers with a renewed optimism. But, with his inauguration less than two weeks behind us, we're still uncertain about what Barack Obama's presidency will mean for the animals. Will Obama be a friend, an aloof acquaintance, stranger, or enemy? Lend your voice and encourage the new administration to be a supportive pal to our vitally important prairie dog companions.

While Punxsutawney Phil predicts the length of winter, prairie dogs foretell the future of the ecosystems they create and sustain. The biological and political status of prairie dogs forecasts our ability as a society to accept that all native wildlife are members of the community of life. We, as their guardians, have an ethical and legal obligation to protect them. Collectively, prairie dogs have lost between 93-99% of their historic range. It is time to take stock of the prairie dog society to appraise its current straits and determine what steps we must take to ensure its recovery.

Each year on Prairie Dog Day, WildEarth Guardians releases *Report From the Burrow: Forecast of the Prairie Dog*. The report assesses the state of the prairie dog community by evaluating the last year's performance of government agencies responsible for prairie dog protection. It is a tool for the public to hold our state and federal government institutions accountable. These agencies are legally bound to protect our wildlife and habitat.

Of the federal and state agencies responsible for prairie dog management, not one of them received an A. Arizona received the highest grade: a B, an improvement from last year's C+. We applaud Arizona's efforts to reintroduce black-tailed prairie dogs, which were extinct in southeastern Arizona for decades. We are disheartened that again several received Ds and Fs for their failures to take any steps to help prairie dogs. Instead some continue promoting, or passively allowing, prairie dog killing. Kansas, Oklahoma, and Texas have all taken steps backwards by relaxing shooting restrictions or approving the use of Rozol (chlorophacinone) and Kaput (Diphacinone) to kill prairie dogs. Formerly banned, these poisons kill prairie dogs and other wildlife by causing internal hemorrhaging. Suffering can last for days before death.

The U.S. Fish and Wildlife Service improved from a D- to a C. In 2008, the agency issued three positive decisions for prairie dogs. It designated part of the Gunnison's prairie dog population as warranted for listing under the Endangered Species Act but precluded from listing due to other agency priority species. The Service also issued preliminary findings that the black-tailed prairie dog and white-tailed prairie dog may deserve federal protection under the Act. Now, the Fish and Wildlife Service must follow through with granting these species full protection under the Endangered Species Act.

Actions government agencies can take to protect and recover prairie dogs include:

- Upgrade the Utah prairie dog status from Threatened to Endangered.
- Grant prompt protection of all unlisted species of prairie dogs—the black-tailed, white-tailed, and Gunnison's—under the Endangered Species Act.
- Ban poisoning and shooting of any prairie dogs, especially on public lands.
- Immediately ban Rozol and Kaput prairie dog toxicants.
- Support active efforts to prevent sylvatic plague outbreaks.
- Prohibit destruction of prairie dog habitat on public lands from oil and gas drilling, off-road vehicles, and other harmful land uses.
- Eliminate subsidies that contribute to destruction of prairie dog populations and habitat.
- Prevent continued loss of habitat to farming for the Endangered Mexican prairie dog.
- Carry out other steps necessary to protect and recover prairie dog populations.

Our 2008 report surveyed prairie dog ecology and threats to all five prairie dog species. Species include black-tailed, Gunnison's, Mexican, Utah, and white-tailed prairie dogs. This year, we highlight South Dakota's Conata Basin. The Basin is a last bastion of the deteriorating black-tailed prairie dog territory. It is a crucial refuge for Endangered black-footed ferrets and other struggling species that depend on prairie dogs, including swift foxes, burrowing owls, and ferruginous hawks.

THE GRADES

We grant letter grades to U.S. state and federal agencies responsible for managing prairie dogs for their recent performance in restoring and protecting prairie dogs and habitat. We use a standard four-point grading system. An “A” or 4.0 points signifies excellent performance, while an “F” or 0 is a failing grade. We use seven categories to determine final grades that are modeled on the Endangered Species Act’s five criteria used to determine federal protection eligibility. We added two criteria: monitoring and conservation to highlight additional activities the agencies should take on behalf of prairie dogs. Below we describe these criteria.

- **The Grading Criteria**

1. **Conserve:** The extent federal or state agencies are progressing toward final conservation plans and actively working to recover and protect prairie dogs.
2. **Habitat:** The degree to which the state or federal agency is working toward restoring prairie dog habitat or allowing habitat destruction with oil and gas drilling, livestock grazing, and off-road vehicle use. Oil and gas drilling facilities plus new roads destroy and fragment habitat and spread vegetation unsuitable for colonies. Non-native domestic livestock grazing promotes the spread of weeds, woody shrubs, and trees that can make land unsuitable for prairie dogs. In some areas, prairie dog colonies and populations expand on grazed land as prairie dogs seek adequate forage.
3. **Shooting:** Federal and state limits on shooting for recreation and control are evaluated as the key problem in this category.
4. **Plague:** Based on agency commitment to plague monitoring and mitigation.
5. **Policies:** An assessment of policies that further prairie dog conservation or contribute to prairie dog decline.
6. **Poison:** Factors include the level of lethal control allowed, existence of poisoning subsidies or direct support, mandatory poisoning policies, permitting Rozol and Kaput, and poisoning restrictions.
7. **Monitor:** Based on frequency of population surveys, robustness of survey methods, records kept on threats, and public access to monitoring data.

- **The Report Card**

GOV	CONSERVE	HABITAT	SHOOTING	PLAGUE	POLICIES	POISON	MONITOR	2008	FINAL
FWS	C	D	F	B	C	B	B	D-	C-
BLM	F	D	F	F	F	I	F	D-	D-
FS	D	C	D	C	D	F	A	D	D+
NPS	B	B	A	C	B	C	A	N/A	B
AZ	B	B	C	B	B	B	B	C+	B
CO	D	D	B	D	D	F	B	D+	D+
KS	F	F	F	F	F	F	C	D-	F
MT	C	F	F	F	F	D	C	D+	D
NE	F	F	F	F	F	F	F	F	F
NM	F	F	C	F	F	D	C	D	D
ND	F	F	F	F	F	F	C	D-	D-
OK	C	B	F	F	B	C	C	C	C-
SD	D	F	D	D	D	F	D	F	D-
TX	C	D	F	F	D	F	C	D-	D
UT	F	F	C	C	D	I	F	D+	D
WY	C	D	B	F	C	F	C	D	D+

- **Comments**

C- **U.S. Fish and Wildlife Service (FWS)**

The FWS oversees the Endangered Species Act. It is responsible for preventing wildlife extinctions and has management authority over federally protected species. Currently, the Utah prairie dog is protected as Threatened. The Mexican prairie dog is Endangered, but the Service has little control over species outside U.S. borders. In 2008, the Fish and Wildlife Service issued preliminary decisions that the black-tailed and white-tailed prairie dogs may require Endangered Species Act protection. The agency will make final determinations within the next two years. The Service made a mixed decision on the Gunnison’s prairie dog. The agency split the species’ population between “montane” and lower elevation “prairie” segments. It designated the montane segment warranted for listing but precluded by higher priority species. It excluded the prairie population, which encompasses the majority of the species’ range. None of these species yet receive actual Endangered Species Act protections needed for survival. Despite this mostly good news, the FWS is failing to protect and recover Utah prairie dogs. The Service will not acknowledge that livestock grazing degrades habitat by spreading weeds and woody shrubs. The FWS allows 6,000 of the animals to be shot annually—with only 10,000-11,000 adults left. FWS approved Habitat Conservation Plans with Iron County and the Cedar Ridge Golf Course that allow habitat destruction, incidental prairie dog killing, and massive translocation with little likelihood of success. The FWS may cede management

control of Utah prairie dogs potentially on all private land to a new, untested private group: Panoramaland. The Service monitors Utah prairie dog colonies for plague.

D- U.S. Bureau of Land Management (BLM)

The BLM manages vast expanses of public land across the West especially in Gunnison's, Utah, and white-tailed prairie dog habitat, though very little in the black-tailed range. The BLM remains focused on leasing out oil and gas drilling permits to private companies on public and private lands—not protecting prairie dogs. The BLM routinely exempts companies from complying with rules that would protect prairie dog colonies and habitat on lands leased for oil and gas drilling. The BLM leases out nearly all of its land in prairie dog habitat for livestock grazing as well. In 2008, Bureau decision-makers rejected a proposal by BLM staff to designate an Area of Critical Environmental Concern on white-tailed prairie dog habitat that hosts Utah's black-footed ferret recovery area. One bright spot, the BLM's review board rejected proposed drilling on a white-tailed prairie dog complex that encompasses Utah's black-footed ferret reintroduction area. Few BLM lands have shooting restrictions, and the agency normally defers to state shooting regulations. The Bureau even allows shooting on its Montana black-tailed prairie dog 40-Complex, a black-footed ferret reintroduction area. The BLM conducts prairie dog surveys on some of its lands.

D+ U.S. Forest Service (FS)

All four U.S. prairie dog species reside on National Forest lands across the West. The Service manages close to 60,000¹ acres of prairie dogs. The Forest Service's National Grasslands in the Great Plains provide the best hope of protecting black-tailed prairie dogs due to sparse public land in the region. The Forest Service allows oil and gas drilling within prairie dog habitat. Nearly all prairie dog habitat is grazed by livestock. The Forest Service defers to state regulations regarding prairie dog shooting, though it could impose bans. The Forest Service has amended land management plans to allow prairie dog poisoning in the Buffalo Gap, Fort Pierre, Little Missouri, Oglala, and the Pawnee National Grasslands. All undertook or approved poisoning in 2008, totaling several thousand acres. Thunder Basin National Grassland proposed a poisoning plan, but it has not been finalized. Plague is rampant across nearly all Forest Service lands within all prairie dog ranges. The Service worked with non-governmental organizations to prevent the spread of plague on the Conata Basin black-footed ferret reintroduction site in 2008 by dusting burrows with insecticides to kill flea-carrying plague. The Service does not otherwise mitigate for plague. The agency conducts regular population surveys.

¹ What does 60,000 acres mean in terms of prairie dog numbers? Though most government agencies use prairie dog acreage as a substitute measure for prairie dog population size, the number of prairie dogs living in an acre varies considerably. The U.S. Fish and Wildlife Service uses a science-based range of 2-18 prairie per acre. For 60,000 acres that means anywhere from 120,000 to 1,08,000 prairie dogs live within those acres.

B National Park Service (NPS)

The Park Service manages mostly small colonies at National Parks, Monuments, and other NPS lands. Four NPS units have occupied prairie dog areas over 1,000 acres. These include Badlands, Theodore Roosevelt, and Wind Cave in the black-tailed range in the Northern Great Plains and Dinosaur National Monument, which has white-tailed prairie dogs. Though National Parks are supposed to fully protect their wildlife, the Park Service has poisoned prairie dogs at Badlands, Devil's Tower National Monument, and Curecanti National Recreation Area. Lethal prairie dog control is also allowed at Wind Cave. The NPS monitors most land units for prairie dog colony changes and plague. The agency also tries to prevent plague by dusting with insecticide to kill fleas at several locations but it has also poisoned prairie dogs to prevent plague occurrence. No cattle grazing or shooting occurs on any National Parks.

B Arizona (*black-tailed and Gunnison's prairie dogs*)

Arizona does more than any other state to protect and conserve prairie dogs. Arizona lists the Gunnison's prairie dog as a "species of greatest conservation need" and black-tailed prairie dogs as "endangered." The Game and Fish Department reintroduced 73 black-tailed prairie dogs into the species' historic range in southeastern Arizona. We are happy that for the first time in many years the black-tailed prairie dog is no longer extinct in Arizona. Black-tailed prairie dogs are fully protected from shooting and poisoning. However, their habitat has been significantly degraded by weed, tree and shrub encroachment and is still open to oil and gas drilling. Land development, especially around Flagstaff, is destroying Gunnison's prairie dog habitat. Shooting Gunnison's prairie dogs is allowed with the exception of a spring seasonal closure during the breeding time. But, shooting pressure on the Gunnison's outside the seasonal closure is extensive. The state monitors but does not mitigate for plague. The state does not limit Gunnison's poisoning. Yet, Arizona Game and Fish conservation plan has an objective to recover Gunnison's prairie dogs to 75% of their historic range in the state. The state monitors for plague and has treated 3,700 acres to prevent plague.

D+ Colorado (*black-tailed, Gunnison's, and white-tailed prairie dogs*)

The Colorado Division of Wildlife has a Grasslands Conservation Plan that includes provisions for conserving black-tailed prairie dogs. The division believes populations exceed goals, so conservation action is unnecessary. In 2008, the division issued a draft management plan for white-tailed and Gunnison's prairie dogs that does not protect prairie dogs from poisoning and promotes shooting and does not have a population or prairie dog acreage target. The agriculture department renewed permits for Rozol and Kaput. Urbanization, particularly across Colorado's Front Range, eats away black-tailed prairie dog colonies every day. Oil and gas drilling has increased within all three prairie

dog ranges. The state is conducting a study on the impacts of oil and gas development in white-tailed prairie dog areas. Colorado has a spring seasonal shooting closure for all three species, but it does not apply to private and many state lands. The division of wildlife does not monitor for plague or mitigate for the disease, but the state Department of Public Health does do some plague monitoring. Other than its shooting closure, Colorado prairie dog policies do more to impede than promote conservation. For example, the state's unique relocation law, SB111, continues to inhibit prairie dog relocation from areas slated for development to other areas, even public lands. Colorado has undertaken three black-tailed prairie dog population surveys since 2002. Yet, the Colorado Division of Wildlife insists that the surveys demonstrate increased prairie dog acreage despite utilizing different methods for each survey.

D- **Kansas** *(black-tailed prairie dog)*

The Kansas Department of Wildlife and Parks has shown little inclination to undertake conservation efforts. The department undertook a 2006 survey that found a 30% decline in acreage. Though Kansas has a prairie dog conservation plan, state laws give poisoning authority to counties. Kansas reinstated permits for Rozol and Kaput. The Kansas Department of Wildlife and Parks did not intervene when the Logan County Commissioners unleashed a massive prairie dog poisoning campaign between 2007-2008. Private lands in the county support a black-footed ferret reintroduction site, established in 2007. Poisoning is undermining ferret recovery by requiring landowners to poison prairie dogs. Kansas made one minor policy change in 2008; residents no longer need a permit for shooting. Plague recently wiped out one-third of the prairie dogs in Morgan County, home of the Cimarron National Grasslands. The state monitors 2,000 acres for plague but does no mitigation.

D **Montana** *(black-tailed prairie dogs, white-tailed prairie dogs)*

The staff of Montana's Fish, Wildlife and Parks Department wants to protect both prairie dog species in the state. The department is hamstrung by the state legislature, which in 2007 removed most of the wildlife department's authority to manage prairie dogs. To regain some management control, the wildlife department is working with the local conservation groups to influence state legislators. Montana's wildlife conservation plan lists both the black-tailed and white-tailed prairie dogs as high priority species despite the lack of conservation ability. The official designation of both species is "vertebrate pest." The state does hold conservation easements on private property to protect a variety of wildlife species but does not quantify the program's results. The wildlife department is working with Wyoming to relocate white-tailed prairie dogs to expand Montana's population. Oil and gas drilling is prevalent in both prairie dog ranges. Shooting is unlimited in Montana. The state does not monitor or mitigate for plague. The state wildlife department is surveying Montana's black-tailed prairie dog population.

F **Nebraska** *(black-tailed prairie dogs)*

The Nebraska Game and Parks Board of Commissioners ordered the state’s Game and Parks Department to stop all prairie dog conservation activities. The state continues permitting Rozol and Kaput. Nebraska receives failing marks in all of our evaluation categories.

D **New Mexico** *(Gunnison’s prairie dogs, black-tailed prairie dogs)*

The state is not actively conserving prairie dogs. Oil and gas drilling is rampant in both the Gunnison’s and the black-tailed ranges in New Mexico. Urbanization is also destroying Gunnison’s prairie dog habitat in Albuquerque, Santa Fe, and Taos. Shooting is banned on state trust lands but is otherwise unrestricted. The state does not monitor or mitigate for plague. The state has no policies aimed at safeguarding either of its prairie dog species. There are no reliable estimates of the Gunnison’s prairie dog population in New Mexico. The New Mexico Game and Fish Department attempted an estimate in 2004, but the FWS rejected it. New Mexico’s Natural Heritage program undertook a survey of black-tailed prairie dogs in 2004, and the state began a new survey in 2008. The state has an incentive program for landowners to protect prairie dogs, but no landowners have enrolled.

D- **North Dakota** *(black-tailed prairie dog)*

North Dakota does not protect its prairie dogs. The state Game and Fish Department acknowledges that legal and illegal poisoning has increased in the state. It has contracted out to gain prairie dog acreage estimates over the last few years.

C+ **Oklahoma** *(black-tailed prairie dog)*

Oklahoma has some conservation-oriented policies but has few prairie dogs left to protect—less than 60,000 acres. The Oklahoma Department of Wildlife Conservation pays landowners \$10 an acre not to poison prairie dogs. The Department also pays landowners who allow prairie dogs to expand on their lands \$10 per expansion acre. Twenty-six landowners participate, and 5,500 acres are currently protected. Oklahoma does not limit shooting, but a license is required. Oklahoma does not monitor or mitigate for plague. The state prohibits poisoning in counties where prairie dog acreage could be reduced below 500 acres. However, the state also approved Rozol and Kaput. Oklahoma has plans to conduct a population survey and is working off a draft conservation plan.

D- **South Dakota** (*black-tailed prairie dog*)

Despite its continued war on prairie dogs, the state supports a landowner incentive program to protect prairie dogs in three counties for the black-footed ferret recovery program. Just two landowners enrolled in 2007. The state pays \$18 an acre to not poison or shoot prairie dogs on private land. In other areas, the state pays \$10 per acre to protect prairie dogs. There is a spring shooting closure on public lands. South Dakota does some plague monitoring but not mitigation. South Dakota's prairie dog conservation efforts cannot outweigh harm caused by its extensive poisoning campaign begun in 2004. South Dakota's is the only wildlife department to pay for prairie dog poisoning on private and state lands. The department poisoned about 30,000 prairie dog acres in 2007 and continued poisoning in 2008. South Dakota's Agriculture Department sells prairie dog poison to landowners. South Dakota conducted its last prairie dog survey in 2007 but did not distinguish occupied colonies from unoccupied colonies.

D **Texas** (*black-tailed prairie dog*)

The Texas Parks and Wildlife Department has a prairie dog management plan but is not meeting its occupied habitat objective. The state does not work to restore or protect prairie dog habitat. Texas allows unlimited shooting of prairie dogs. Texas had a temporary ban on collecting animals for the pet trade, and now allows the collection of up to 25 prairie dogs without a permit and more with a permit. The state does not monitor or mitigate for plague. The state maintains a voluntary prairie dog colony-monitoring program meant to promote conservation, but the state does not have regulations that protect prairie dogs. The state agriculture department distributes poison and continues to approve Rozol and Kaput. On a positive note, Texas supports a landowners incentive program for prairie dogs and enrolled five landowners in 2007 protecting 8,700 acres.

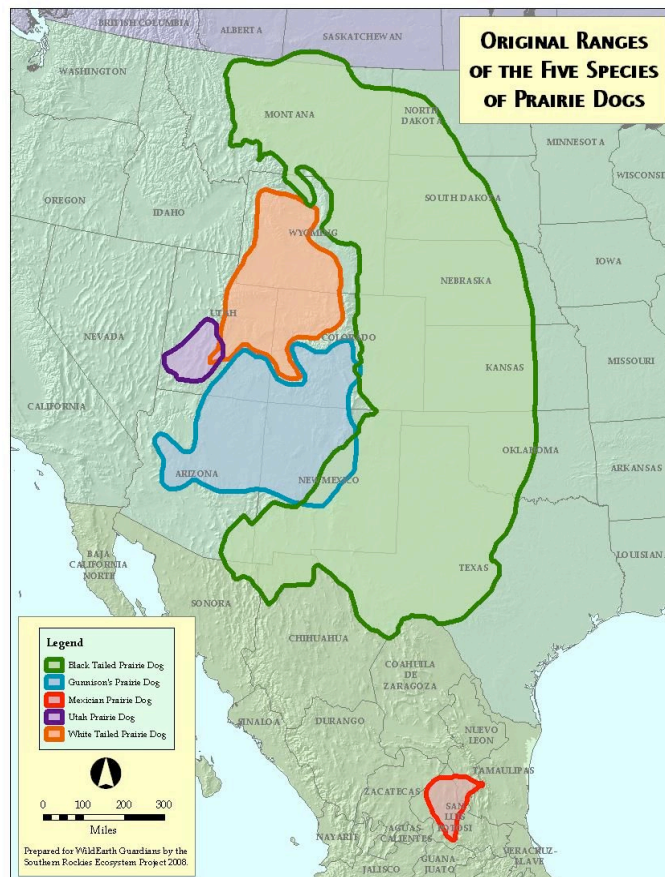
D **Utah** (*Gunnison's, Utah, and white-tailed prairie dogs*)

The Utah Division of Wildlife Resources has not made any significant policy shifts that would protect and recover its prairie dogs. The state is not funding any Gunnison's conservation work. The Utah Division of Wildlife Resources has no plans to restore prairie dog habitat. Utah bans Gunnison's prairie dog shooting during breeding season. It maintains no white-tailed shooting restrictions but prohibits shooting on the black-footed ferret reintroduction. Based on reports by Division of Wildlife Resources, technically Utah bans killing Gunnison's and white-tailed prairie dogs under a "controlled" wildlife species designation, but this is not enforced. As a federally listed species, the U.S. Fish and Wildlife Service has authority over the Utah prairie dog. However, the Service delegates much of its responsibility to the state. The Utah Division of Wildlife Resources used to monitor Utah prairie dog populations and produce an annual status report but has not released a report since 2003 or census numbers for 2008. The Division treated a few

Utah prairie dog colonies with insecticide to prevent the spread of plague via fleas in 2008.

D+ Wyoming (*black-tailed and white-tailed prairie dogs*)

The Wyoming Game and Fish Department has not conducted a statewide white-tailed prairie dog survey since 1995 but believes the population is secure. The department surveyed its black-tailed prairie dog populations in 2006. It believes acreage expanded since 2003 but that the species is threatened by increased poisoning. White-tailed prairie dogs are a “species of concern” but this has no management implications. The state establishes private land conservation easements to protect a variety of species and has an incentive program to pay landowners to allow prairie dogs on their lands. One conservation easement protects white-tailed prairie dogs. Around Thunder Basin National Grassland, the state is paying four landowners \$3 per acre to protect 487 acres of black-tailed prairie dogs. A non-profit provides an equal dollar match. Wyoming has no limits on shooting. The state does not monitor or mitigate for plague. Wyoming law puts prairie dog poisoning in county hands. Rozol and Kaput are approved for poisoning black-tailed prairie dogs. The Wyoming Game and Fish Department is concerned about increasing black-tailed prairie dog poisoning and believes landowners are misusing Rozol and dropping poisons from aircraft.

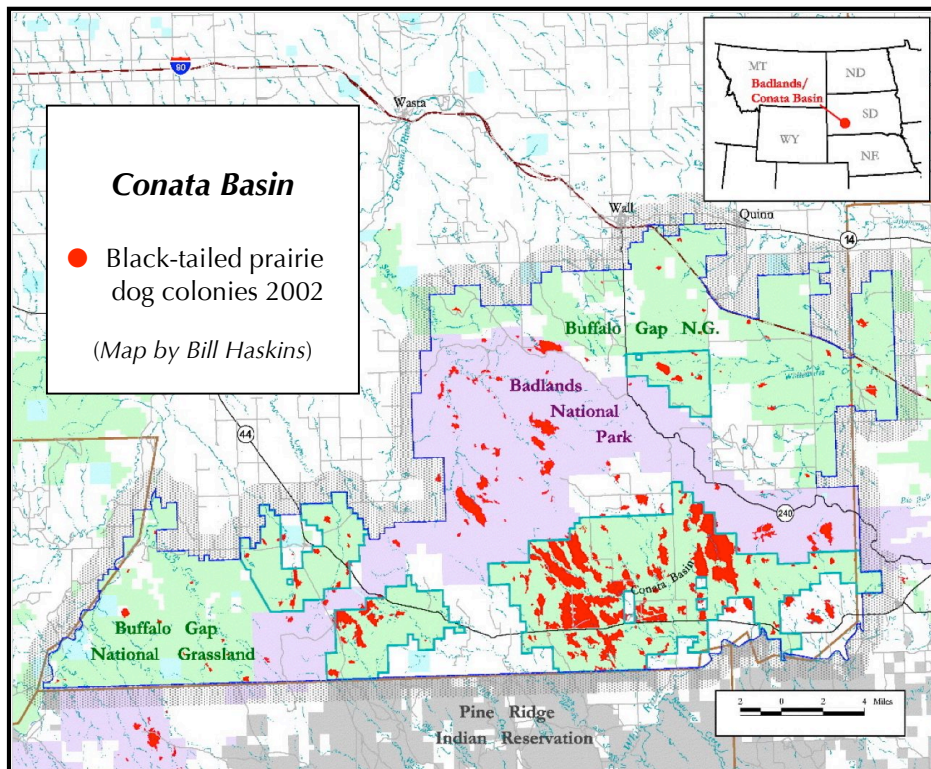


CONATA BASIN: SAVING A LAST STRONGHOLD

Conata Basin hosts the largest remaining concentration of black-tailed prairie dog colonies in the United States. This is the last large (over 10,000-acre) prairie dog complex² on public lands. Conata Basin, in southwest South Dakota, includes parts of Badlands National Park, Pine Ridge Indian Reservation, private lands, and the Buffalo Gap National Grassland—the heart of the Basin, which is managed by the U.S. Forest Service. The Basin is a gorgeous expanse of grassland surrounded by rocky, colorful escarpments of the Dakota Badlands.



A prairie dog eyes the Badlands in Conata Basin. © T. Livieri.



The unique prairie dog complex makes the Basin the most ecologically vital, most controversial, and most tragic prairie dog region in the West. Wildlife champions have been fighting livestock ranchers, who oppose prairie dogs, and over the Basin for decades. As one of their last strongholds, we must save prairie dogs of Conata Basin and the wildlife that depend on them.

² For purposes of black-footed ferret recovery, scientists define a prairie dog complex as: groups of nearby colonies within 1.5 kilometers of each other.

- **Government Waste at its Worst**

The Conata Basin situation stands as a stunning example of government economic and public lands mismanagement at its worst. It demonstrates the prairie dog/black-footed ferret paradox occurring on all ferret recovery sites. The U.S. Government spends millions of our tax dollars trying to rescue Endangered ferrets, which are on the verge of extinction. Yet, it spends even more to kill off the ferret's food source and habitat creator: the prairie dog. It's a constant tug-of-war, in this case between the Fish and Wildlife Service—responsible for preventing wildlife extinction, and the Forest Service—responsible for protecting our national forests and grasslands while also promoting agricultural and extractive interests.

- **Importance of Conata Basin**

Because of its prairie dog abundance, Conata Basin sustains the best recovery area for black-footed ferrets. Black-footed ferrets live only on prairie dog colonies. They sleep and breed in prairie dog burrows and rarely eat anything but prairie dogs. Ferrets need large prairie dog complexes.

The abundant prairie dog colonies also make Conata Basin a magnet for other prairie wildlife. The Basin is home to the largest burrowing owl population in the northern plains, numerous ferruginous hawks, a newly reintroduced swift fox population, badgers, eagles, and more.

Because of dramatic prairie dog population losses across their range, black-footed ferrets have been on “life-support” for more than 35 years. They were one of the original species protected under the Endangered Species Act in 1973. In 1974, scientists believed the ferret went extinct when the last known population died out in South Dakota. When a remnant population was discovered in Wyoming, it seemed that the black-footed ferret came back from the dead. In the mid-1980s state and federal officials caught the last 18 remaining wild ferrets for a captive-breeding program as a last-ditch effort to save the species. In 1996, the U.S. Fish and Wildlife Service and the U.S. Forest Service worked together to establish a ferret reintroduction site in Conata Basin on the Buffalo Gap National Grassland, managed by the Forest Service.

Today, of the 18 ferret reintroduction sites across prairie dog country, Conata Basin is the only one to have consistently maintained a larger number of ferrets in the wild than the number of individuals released from captivity. In 2007, Conata Basin had a population of



A black-footed ferret. © D. Showalter.

at least 292 ferrets after the release of 150 over 12 years. In contrast, on the UL Bend National Wildlife Refuge in Montana, the Fish and Wildlife Service found only 13 ferrets after releasing 208 since 1994. Outside of Conata Basin, scientists have found keeping wild ferret populations alive and breeding after reintroduction to be extremely difficult, if not impossible.

Black-footed ferret researcher, Travis Livieri, checks on a recaptured ferret at Conata Basin. © T. Livieri.



Across the West, disease, poisoning, shooting, habitat destruction, livestock grazing, drought, and other threats have caused such severe prairie dog losses and colony fragmentation that almost no prairie dog complexes remain that can sustain ferrets. The relative success of Conata Basin as a black-footed ferret recovery area is due to two situations: 1) conservation of prairie dogs on large, contiguous blocks of public land, and; 2) lack of sylvatic plague, an exotic disease that has

spread from west to east across almost the entire prairie dog range. Sadly, these two situations recently changed.

- **Killing Conata**

Many in the South Dakota livestock industry consider prairie dogs pests. Industry representatives put tremendous pressure on government officials to poison prairie dogs on the Buffalo Gap National Grassland and surrounding areas. On August 12, 2004, the Fish and Wildlife Service announced that it was removing the black-tailed prairie dog from the list of “candidate” species awaiting federal protection. Also in 2004, the Forest Service lifted its ban on prairie dog poisoning, which it enforced since 1999. Shortly after, the Forest Service announced plans to poison prairie dogs on a massive scale in Conata Basin and across Buffalo Gap.

WildEarth Guardians, in coalition with other organizations, sued the Forest Service to help save Conata Basin’s ferrets, prairie dogs, and other wildlife. The Forest Service planned to exterminate thousands prairie dog acres. Unfortunately, we could not prevent poisoning completely. Our lawsuit restricted killing to narrow buffer zones along boundaries with adjacent private lands. We saved roughly 4,500 acres. The lawsuit also forced the Forest Service to undertake an analysis of poisoning’s environmental impacts. Its assessment revealed that many animals dependent on prairie dogs and those which benefit from prairie dog colonies could be killed or harmed by prairie dog poisoning, including black-

footed ferrets. Nonetheless, the Forest Service poisoned over 20,000 acres of prairie dogs between 2004-2008 in the buffer zones.

South Dakota kicked off its own poisoning program for private lands the very day after the Fish and Wildlife Service announced its 2004 prairie dog decision. Poisoning prairie dogs on private lands in and around Conata Basin has and will continue to prevent black-footed ferret recovery, which requires ferret expansion. Between 2004-2007, the state poisoned over 70,000 acres on private and state land and continues this program. This figure includes only poisoning paid for and conducted by the state not additional poisoning by landowners who buy poison from the South Dakota Agriculture Department. South Dakota sold over one million pounds of poison since 2004. That's enough to kill every prairie dog in the United States, let alone in South Dakota.

- **The Dreaded Plague**

In May 2008, the event that all prairie dog and ferret supporters hoped would never occur happened: Conata Basin's prairie dog population started dying of plague. Federal agencies and non-governmental organizations worked together to save the prairie dogs and ferrets by dusting individual burrows with insecticide to kill the plague-carrying fleas. An arduous task, but the flea dusting effort likely saved several thousand prairie dog acres and the heart of the ferret recovery area. Yet, plague killed off about one-third of the prairie dogs. Now infected, plague die-offs could become a recurring event in the Basin's future. (See: *When Plague Hits a Colony Complex* on page 16.)

- **Just Plain Crazy**

Ironically, the Forest Service is killing Conata Basin's prairie dogs on behalf of fewer than a dozen ranchers who hold subsidized livestock grazing permits on the Buffalo Gap Grassland. The price to satisfy a few private interests may be the extinction of black-footed ferrets and the loss of a unique biodiversity hotspot in Conata Basin.

In a continued twist, the Forest Service proposed a 2007 plan to kill even more prairie dogs on the Buffalo Gap—this time within the original boundary buffer zones and core black-footed ferret recovery areas. After intense public scrutiny that included a CNN exposé, the Forest Service finalized a 2008 prairie dog plan that left Conata Basin out of the killing zones but allowed prairie dog poisoning everywhere else, including potential ferret expansion areas in Buffalo Gap, Oglala, and Fort Pierre National Grasslands. And, another proposal to allow poisoning more prairie dogs within Conata Basin is still under consideration.

- **Stopping the Madness**

WildEarth Guardians is putting extra emphasis on protecting black-tailed prairie dogs and helping to save black-footed ferrets in and around Conata Basin. We are working with other organizations, including Defenders of Wildlife and the Prairie Dog Coalition, to stop the insanity. WildEarth Guardians believes a combination of carrots and sticks will change the Conata Basin situation to one where humans and prairie wildlife can coexist ... eventually. We support the actions of other groups trying to build collaborations with landowners for protecting prairie dogs (see *box*). Where necessary we will ensure that federal environmental laws are enforced to protect the unique wildlife that call the Conata Basin home.

New Partnerships Bring Hope to Conata Basin

By Lindsey Sterling Krank, Prairie Dog Coalition

The situation in Conata Basin is grim. Yet, some hope may be on the horizon. In the past few years, conservationists have developed stronger partnerships with landowners around black-footed ferret recovery zone and across the region. More and diverse voices from South Dakota's wildlife advocacy community are coming to the table. Public support for wildlife is strong among South Dakotans. Local citizens, often new to the game of wildlife and public lands policy, are joining with conservation groups to urge elected officials to support positive solutions. Prior to these discussions, Governor Rounds, and most of South Dakota's congressional delegation and local government representatives vocally opposed any prairie dog safeguards. They actively pressured the federal government to conduct and subsidize prairie dog eradication on public and private lands. Most continue to resist prairie dog protection, but several are more open to supporting local conservation ideas. A common love for the land has brought reluctant ranchers and conservationists together to overcome long-standing distrust. Local Forest Service representatives have facilitated some of these meetings, yet Bush administration appointees have forced top-down decisions to poison. Whether it is establishing grass banks, supporting landowner incentives, advancing eco-tourism, continuing to build public support for native wildlife, or fighting government mismanagement, conservation groups are committed to doing what it takes to save the treasure of Conata Basin's wildlife and wildlands.

For if we can save the prairie dogs, the ferrets, and other prairie wildlife in Conata Basin, we have hope of saving them elsewhere across the American West.



A Conata Basin black-footed ferret peaks out from a prairie dog burrow.
© T. Livieri

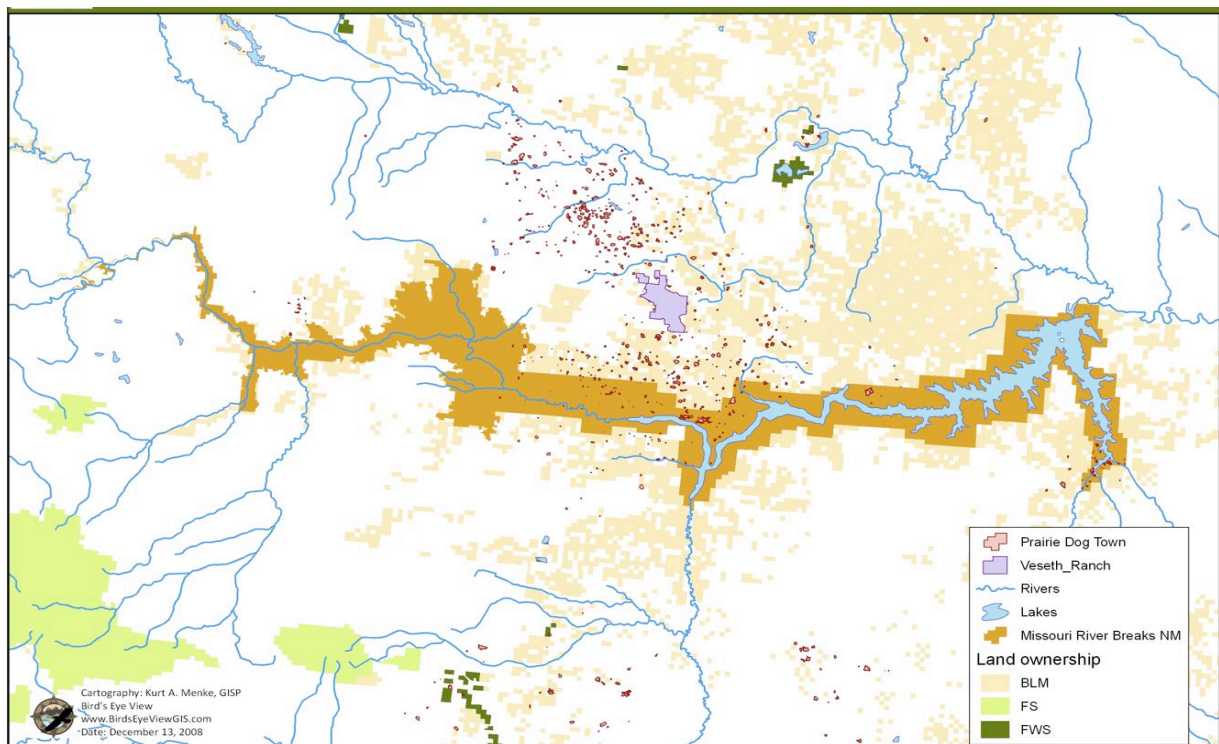
WHEN PLAGUE HITS A PRAIRIE DOG COLONY COMPLEX

Colonies expand and contract in response to natural factors including bison grazing, fire, and drought. The exotic plague threat emerged just in the 1940s and disrupted this sustainable dynamic. Prairie dog colonies can repopulate after plague but populations rarely recover to peak levels. Plague cycles distress prairie dog ecosystems. Without prairie dogs, burrows collapse, weeds move in, and the areas become uninhabitable for many animals. Birds lose nesting and foraging grounds. Burrowing owls, swift foxes, and others lose their homes. Wildlife such as ferruginous hawks, badgers, and golden eagles lose a major prey base. For black-footed ferrets, which need large prairie dog colony complexes and also succumb to plague, cycles of plague spell doom.

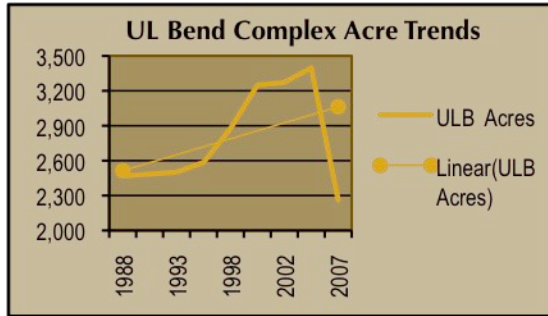
Until plague first hit Conata Basin in 2008, ferret populations and prairie dog colony acreage was trending upward. What will plague mean for the Basin's wildlife? Without protections from poisoning in and around the area coupled with flea control and vaccine development, poor performance at other sites gives us an idea. The following sections compare prairie dog colony trends in Phillips County, Montana and Conata Basin.

The UL Bend (ULB) National Wildlife Refuge in Montana became a black-footed ferret reintroduction site in 1994. The area in southern Phillips County, Montana, had abundant public land. The ULB sits within the Charles M. Russell (CMR) National Wildlife Refuge and near public lands where ferrets could expand. In 2001, the government oversaw ferret releases to Bureau of Management (BLM) lands north of the refuges.

The Charles M. Russell and UL Bend National Wildlife Refuges

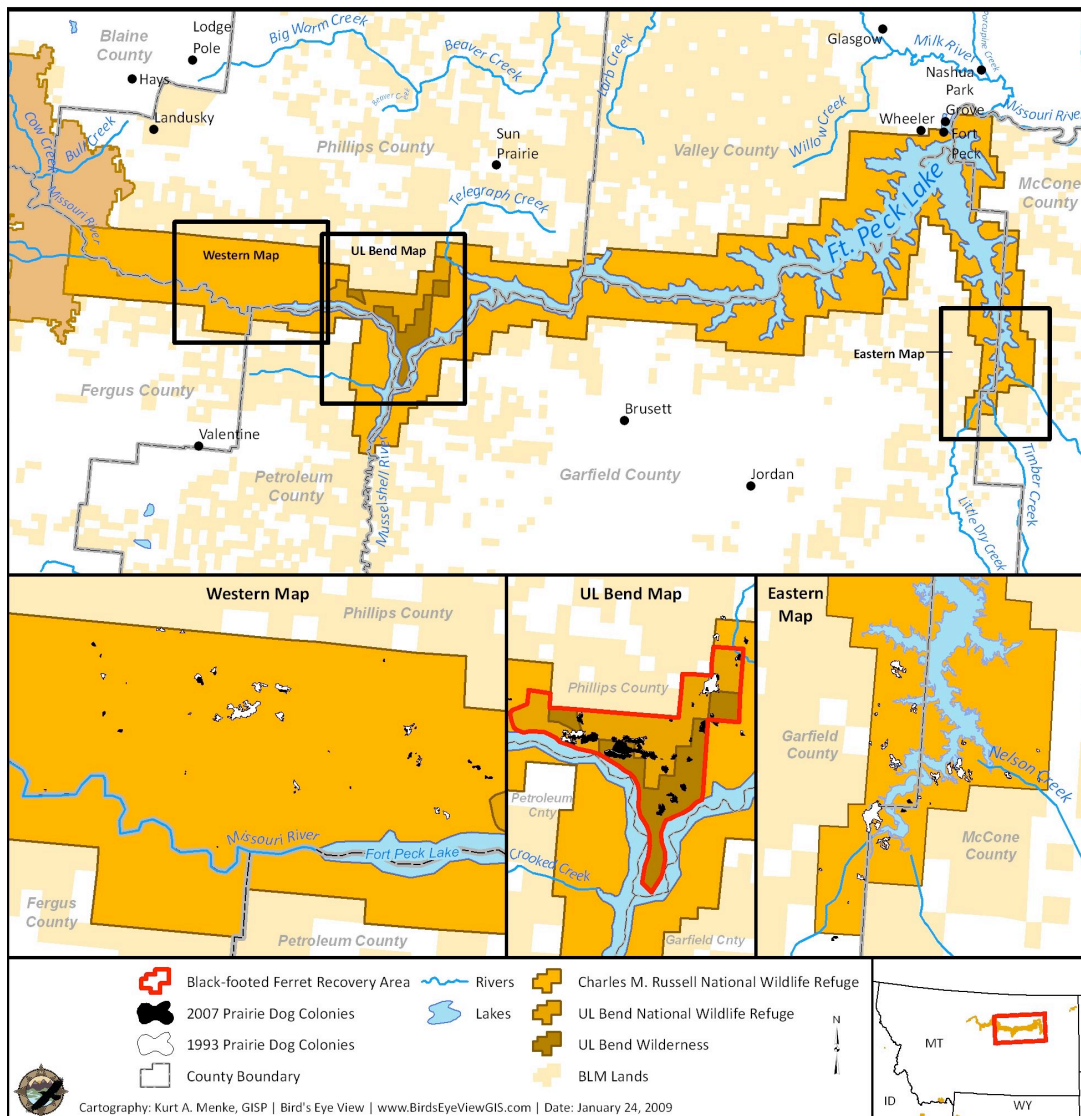


Plague first infested the Montana complexes in 1992, killing off 75% of the prairie dogs by 1996. Ferret populations crashed too. Officials conducted flea dusting on the ULB between 1993-2005 to prevent plague. Between 1994-2005, the Fish and Wildlife Service released 208 ferrets into the refuge and found just 13 in 2007. The Service suspended ferret releases in 2005. The BLM released a total of 95 ferrets and found no ferrets in its last survey.

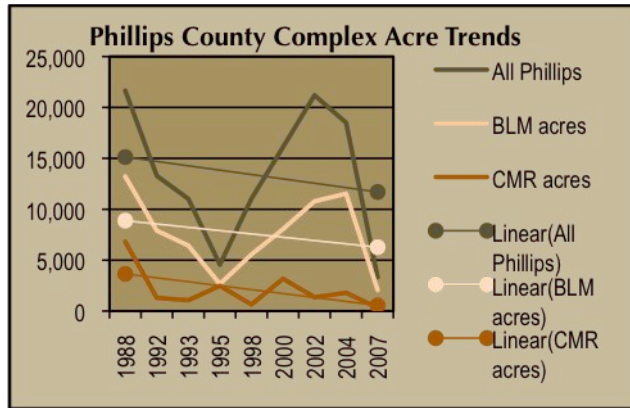


The graph (left) and map (below) show how flea dusting helped save part of the UL Bend prairie dog complex—at least until dusting stopped in 2005. However, the Western and Eastern maps sections of the Charles M. Russell refuge demonstrate how plague wiped out and fragmented untreated colonies there. The white areas of the maps within the CMR are colonies that died off.

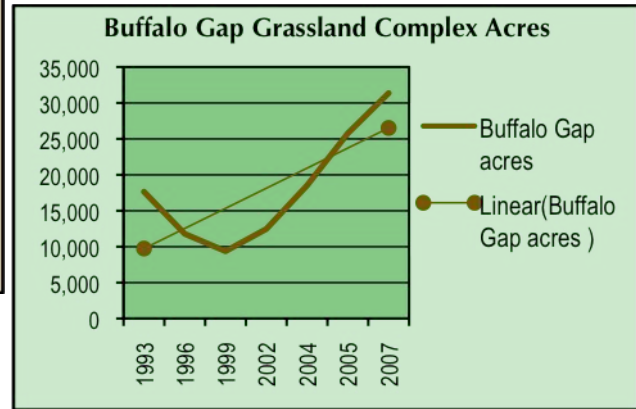
A Closer Look at the Charles M. Russell Colony Loss and Fragmentation



Comparing prairie dog colony size trends in Phillips County, Montana and Conata Basin, prior to the 2008 plague, clearly demonstrates the differences between prairie dog complexes with and without plague. The upward trend in Conata Basin colony acreage indicates why the region is, and hopefully will remain, a black-footed ferret stronghold. While the downward cycling of the Phillips County complex helps explain the loss of ferrets there.



The graph (left) of the Phillips County complex illustrates a typical plague trajectory. The Buffalo Gap National Grassland data (Below) from within Conata Basin shows a strong growth trend, before 2008.

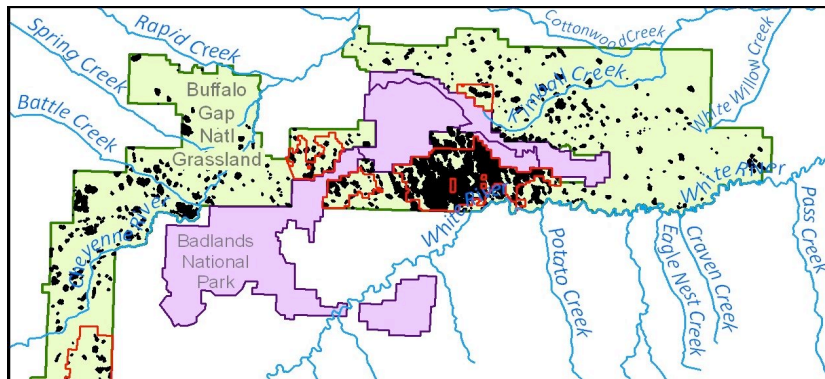
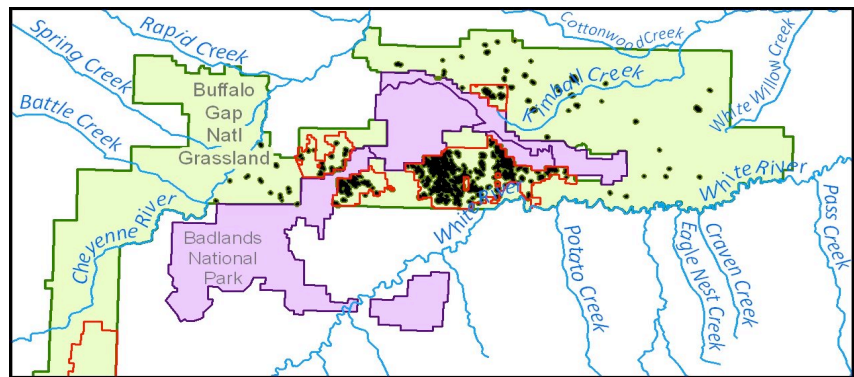


Government scientists are still analyzing prairie dog and ferret data from 2008.

They believe at least 10,000 prairie dog acres died out during the plague outbreak.

The map (below, left) shows Conata Basin in 1996, when black-footed ferrets were first released. The map (below, right) shows the general trend of colony complex expansion between 1996 and 2006.

Black-footed Ferret Recovery Area on the Buffalo Gap National Grassland in 1996.



Black-footed Ferret Recovery Area on the Buffalo Gap National Grassland in 2006.

STATUS REVIEWS OF THE FIVE PRAIRIE DOG SPECIES

As evident from the earlier sections of this report, threats to prairie dogs are many and safeguards are few. The reach of plague continues to expand east. It is a significant threat to all species except for the Mexican prairie dog. The livestock industry and others have increased prairie dog poisoning and demands for poisoning subsidies. Contrary to some prairie dog managers, livestock grazing and oil and gas development can reduce prairie dog habitat by spreading weeds. Fire suppression on behalf of the livestock and oil and gas industries remove natural fire from prairie dog habitat, which also spreads weeds and encourages woody shrub and tree encroachment. The loss of native grasses to taller, woody vegetation diminishes existing prairie dog habitat. Recreational shooting of prairie dogs remains popular and more lethal to prairie dogs and dangerous to other wildlife and shooting technology increases. Because state wildlife departments are failing to protect them, WildEarth Guardians recommends all five species receive necessary protection under the ESA.

- **Black-tailed Prairie Dogs**

Prairie dog supporters got a nice surprise on December 2, 2008. Under court order, the Fish and Wildlife Service responded positively to WildEarth Guardians' August 2007 petition to list the black-tailed prairie dog under the Endangered Species Act. The agency agreed that our petition demonstrated the species might need federal protection. The Service must now conduct a full review and issue its final decision in December 2009.



Black-tailed prairie dogs at play. © S. Nervig

This is a positive step. Endangered Species Act listing is likely the only way to prevent the black-tailed prairie dog's extinction. State agencies within the black-tailed prairie dog range have done little to protect prairie dogs. Most have enacted policies to promote killing them. We urge the Service to give the species the federal protection it deserves.

The black-tailed prairie dog population once numbered in the billions and ranged across 11 U.S. states and portions of Mexico and Canada. The animals disappeared from up to 99% of their historic range in the last 150 years. Plowing up native grasslands for agriculture, particularly in the eastern portions of the species' range, resulted in the permanent loss of approximately 40% of the rodent's original habitat.

- **Gunnison's Prairie Dogs**

Under court order, the Fish and Wildlife Service decided that part of the Gunnison's prairie dog population warranted protection under the Endangered Species Act. The Service determined that "montane" populations of the species in southwestern Colorado and northwestern New Mexico warrant federal listing, but the population cannot be listed now because the Service says it is too busy. This Endangered Species Act "candidate" status is also called "warranted-but-precluded." Approximately 250 species wait in the same policy purgatory, where some have languished for decades. The Service deemed that lower elevation "prairie" populations in Arizona, Colorado, New Mexico, and Utah do not deserve federal protection. Most Gunnison's prairie dogs live in the prairie region. We are pleased that the Fish and Wildlife Service decided that part of the Gunnison's population needs protection. This is not enough. The animals will not benefit from Endangered Species Act safeguards until they are listed as a Threatened or Endangered species.



Gunnison's prairie dog. © S. Nervig

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WildEarth Guardians gave the Fish and Wildlife Service notice in 2008 that we plan to sue over its Gunnison's prairie dog ruling. We believe the agency violated the Endangered Species Act by splitting the Gunnison's population into arbitrary categories. The entire Gunnison's prairie dog population in its original range in Arizona, Colorado, New Mexico, and Utah should be granted federal protection. Additionally, the agency is abusing the warranted-but-precluded loophole.

The Gunnison's prairie dog population has declined by 98-99% across its historic range. Habitat occupied by prairie dogs has declined from 24 million acres in 1916 to 340-500 thousand acres as of 2008. Land development and oil and gas operations are particular threats. For example, the Fish and Wildlife Service predicts that urban and suburban sprawl and commercial development will impact 49% of Colorado's habitat by 2020.

- **Mexican Prairie Dogs**

Mexican prairie dogs are protected under the U.S. Endangered Species Act as Endangered. The U.S. Government, however, can do little more than arrest people who try to bring the animals into the country. The Mexican prairie dog is critically endangered, primarily due to farming and poisoning on livestock ranches. Agriculture in the state of Nuevo Leon remains the biggest threat to Mexican prairie dogs. Transnational potato companies, in

particular, are destroying Mexican prairie dog habitat. A major problem is that these companies do not understand Mexican environmental laws that prohibit killing prairie dogs, and the laws are not consistently enforced.



Mexican prairie dog. ©R. List

The Mexican government outlawed killing Mexican prairie dogs in 2004. Mexican prairie dogs are now doing best on livestock pastures because poisoning and shooting are both outlawed. Landowners do not always abide by the law, but these threats have decreased. However, the law does not protect prairie dog habitat. Conservation organizations, including Pronatura Noreste and Profauna, are working to protect the animals and their habitat. For example, private landowners and collective livestock ranches (called *ejidos*) have given conservation easements to environmental groups to help prairie dog and habitat recovery. The states conserve Mexican prairie dogs on a colony basis.

Only 2% of the species' population still exists. Colonies have shrunk and disappeared. However, Mexican

prairie dogs in the northern-most areas of Coahuila State and southern-most areas of San Luis Potosí State have experienced some population stability within the last three years.

- **Utah Prairie Dogs**

Utah prairie dogs keep moving closer to extinction. In 2007, the Fish and Wildlife Service refused to upgrade the species from Threatened to Endangered. WildEarth Guardians submitted the petition to up-list Utah prairie dogs to Endangered in 2003 in collaboration with other groups and individuals. This would have halted shooting and other threats. We sued the Fish and Wildlife Service for rejecting this petition.



Utah prairie dogs. © J. Alford

Government agencies treat the Utah prairie dog community as if there are plenty of members to throw away. The agency called the animals a “nuisance” in its own Utah prairie dog recovery plan. The Service allows people to shoot up to 6,000 prairie dogs per year—over half the adult population! The Cedar Ridge golf course and private commercial

interests have permission to eliminate or remove by relocation large segments of the population. The Fish and Wildlife Service tries to relocate prairie dogs to public land, but this results in more prairie dog deaths than rescues. The Service may hand over Utah prairie dog management on private land to a little-known, non-government group called the Panoramaland Resource Conservation and Development Council. The Service would give up authority of potentially two-thirds of the remaining Utah prairie dogs for the next 50 years.

The Utah prairie dog population has declined from about 100,000 to around 10,000 individuals. Utah prairie dogs disappeared from close to 90% of their historic habitat.

- **White-tailed Prairie Dogs** (co-authored with Erin Robertson, Center for Native Ecosystems)

Our friends at Center for Native Ecosystems heads up the campaign to recover white-tailed prairie dogs. In 2006, Center for Native Ecosystems' research uncovered that the Interior Department illegally ordered the Fish and Wildlife Service not to grant the white-tailed prairie dog Endangered Species Act protection. Center for Native Ecosystems, WildEarth Guardians, and others sued the Service in 2007.

In 2008, the agency agreed that substantial information indicated that protection under the Act might be necessary. The Service will complete a review of the white-tailed prairie dog's status and issue a new decision by June 2010. While white-tailed prairie dogs await the Fish and Wildlife Service's decision on Endangered Species Act status, the animals and their habitat are still suffering. So far, federal and state agencies have ignored their opportunity improve prairie dog management before the Service makes its 2010 decision.



White-tailed prairie dog. © S. Nervig

Center for Native Ecosystems helps protect white-tailed prairie dog habitat from oil and gas drilling. In 2008, white-tailed prairie dogs in Colorado were granted a reprieve from drilling. The Bureau of Land Management manages much of the species' habitat. In 2006, the Bureau leased the best white-tailed habitat in Colorado for oil and gas drilling. The leased area included a black-footed ferret recovery site. In 2008, the BLM's review board overturned the Bureau's drilling plans in response to Center for Native Ecosystems' appeal. This ruling saved 63,000 acres of habitat.

White-tailed prairie dogs suffered a setback in Utah in 2008. The BLM failed to designate Areas of Critical Environmental Concern (ACECs) to protect habitat. These are special BLM-designated areas that safeguard sensitive species from threats, such as oil and gas drilling. In this case, the Bureau rejected its own staff recommendation for the ACECs that encompass Utah's black-footed ferret reintroduction area.

The white-tailed prairie dog once occupied 10-44 million acres across sagebrush areas of Montana, Colorado, Utah, and Wyoming. Since the late 1800s that area has dropped to just 805,000 acres. That is a decline of 92% to 98%.

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