

October 16, 2007

Stephanie K. Meeks  
Acting President and Chief Executive Officer  
The Nature Conservancy  
4245 North Fairfax Drive, Suite 100  
Arlington, VA 22203-1606

Dear Ms. Meeks:

We, the undersigned organizations and individuals, oppose The Nature Conservancy's practice of poisoning prairie dogs. Prairie dogs are native keystone species of our endangered western grasslands. All five prairie dog species within the genus *Cynomys* are imperiled and declining. We respectfully request that TNC discontinue poisoning prairie dogs.

On September 22, 2007 the *Hays Daily News* reported that TNC illegally gassed prairie dogs with Phostoxin® on its Smoky Valley Ranch in Kansas. This article shocked many of us who learned for the first time that TNC lethally controls prairie dogs. In an email response to critics, TNC Kansas Conservation Director Rob Manes apologized for not obtaining the required permit, but did not respond to criticism over the use of this poison in the first place. TNC also supports the Forest Service's plan to poison prairie dogs on Thunder Basin National Grassland.

TNC acknowledged that it "culls" (i.e., poisons) prairie dogs in a 2005 *Nature Conservancy* magazine article, "Prairie Dog Management Across the Great Plains," now on its website at: <http://www.nature.org/magazine/spring2005/features/art14875.html>. This article also recognized the importance of prairie dogs as keystone species and their dramatic population decline over the last century. The article articulated TNC's goal of ensuring "healthy, vibrant" populations of prairie dogs—a goal we support. However, killing prairie dogs that are so essential to maintaining grassland ecosystems and wildlife is antithetical to sound scientific principles of ecology, common sense notions of conservation, and humane wildlife management.

Regardless of the method used, or whether appropriate permits are obtained, all legal and available poisons kill non-target wildlife and cause significant suffering to prairie dogs. TNC used chlorophacinone (Rozol) to kill prairie dogs on its Smoky Valley Ranch in 2006, resulting in the deaths of not only prairie dogs but also a badger. Chlorophacinone is a bait-delivered anti-coagulant that causes internal hemorrhaging, which can continue over the course of five or more days until death. Phostoxin® or aluminum phosphide, the gas TNC used recently to kill prairie dogs, causes acute pulmonary edema and other painful symptoms when the gas mixes with moisture in an animal's lungs. Aluminum phosphide is not selective and will likely kill any animal in a burrow where it is applied. Zinc phosphide is an ingested bait poison that reacts with an animal's stomach acid to produce a highly toxic gas that acts primarily on the heart, liver, and kidneys; symptoms, including vomiting and convulsions, can occur within 20 minutes of ingestion but last 2-3 days until death. Zinc phosphide is hazardous to non-target wildlife, particularly granivorous birds.

By continuing to poison prairie dogs and support poisoning, TNC reinforces the idea among people who dislike prairie dogs that the animals are “pests” or “vermin” that require control. This indicates that TNC has accepted myths and misconceptions about prairie dogs promoted by conservation opponents. And, this undermines the efforts of other conservation organizations and caring individuals that promote policies and conservation actions—including non-lethal humane relocation methods—that truly protect prairie dogs and their ecosystems.

TNC has rationalized its actions, as in the Kansas Smoky Valley Ranch case, by claiming that antiquated laws have forced the organization to kill prairie dogs. Actions speak louder than words. Poisoning vast acreages of prairie dogs on TNC property and on neighboring properties without fighting the legislation is akin to supporting that legislation, especially when an organization that professes to be a conservation organization does the poisoning. The situation is particularly sad in Kansas because some of TNC’s rancher neighbors have been willing to go to court, risk financial penalties, and accept social scorn to protect the prairie dogs on their land. TNC missed a tremendous opportunity to stand in solidarity with these ranchers to challenge Kansas’s antiquated anti-prairie dog laws had it refused to kill prairie dogs on the Smoky Valley Ranch. This would have sent a powerful, positive message to local landowners, your members, and the rest of the country that these animals are important and worth protecting and that laws need to be changed to reflect current values.

The Nature Conservancy is one of the most influential non-profit organizations in the U.S. We urge TNC to do the right thing and take a leadership role in protecting prairie dogs by developing a written policy that prohibits lethal control on land it owns and leases. We also request that TNC stop poisoning prairie dogs on neighboring properties or participating in lethal control on any other properties. Please join with us to fight outdated laws and policies that encourage or require prairie dog killing. There is still time to support conservation-minded ranchers in Kansas to challenge the state’s mandatory poisoning laws, for example. As the nation’s wealthiest conservation NGO and largest private land management organization, TNC should embrace this role as a true prairie dog defender.

We look forward to your timely response to our request. You may contact Lauren McCain directly at 303-573-4898 or [lmccain@fguardians.org](mailto:lmccain@fguardians.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'L McCain', with a long horizontal line extending to the right.

Lauren McCain, Ph.D.  
Deserts and Grasslands Program Director  
Forest Guardians  
1536 Wynkoop Street, Suite 302  
Denver, Colorado 80202

And the following signatories:

Animal Defense League of Arizona  
Stephanie Nichols-Young, President  
Phoenix, AZ

Animal Protection Institute  
Monica Engebretson, Project Director  
Sacramento, CA

Animal Protection of New Mexico, Inc.  
Elisabeth Jennings, Executive Director  
Albuquerque, NM

Animal Protection Voters  
Elisabeth Jennings  
Albuquerque, NM

Marc Bekoff, Professor Emeritus  
Ecology and Evolutionary Biology  
University of Colorado  
Boulder, Colorado

Big Wildlife  
Brian Vincent, Communications Director  
Vancouver, BC

Biodiversity Conservation Alliance  
Erik Molvar, Wildlife Biologist  
Laramie, WY

Liz Boussard  
Public Land GIS and Policy Consultant  
Flagstaff, AZ

Center for Biological Diversity  
Michael Robinson, Conservation Advocate  
Pinos Altos NM

Conservation Congress  
Denise Boggs, Executive Director  
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Debra L. Donahue, J.D.  
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Grand Canyon Wildlands Council  
Kim Crumbo, Conservation Director

Grand Canyon, AZ

Habitat Harmony, Inc.  
Sherry Golden, Director  
Flagstaff, AZ

Steven G. Herman, Ph.D.  
Emeritus Member of the Faculty  
The Evergreen State College  
Olympia, Washington

John Hoogland, Ph.D.  
University of Maryland Center for Environmental Science  
Frostburg, MD

Humane Society of the United States  
Dave Pauli, Northern Rockies Region Director  
Billings, MT

Jews Of The Earth  
Daniel Ziskin, Ph.D., President  
Denver CO

Midwest Prairie Dog Shelter, Ltd.  
Dianne James, President  
Wabash, IN

Nebraska Green Party  
Steve Larrick and Frances Mendenhall, Co-chairs  
Lincoln, NE

Reed F. Noss, Ph.D.  
Davis-Shine Professor of Conservation Biology  
University of Central Florida  
Department of Biology  
Orlando, FL

Elizabeth L. Painter, Ph.D., Ecologist  
Santa Barbara, CA

Prairie Dog Pals  
Yvonne Boudreaux, President  
Albuquerque, NM

Prairie Dog Specialists, Inc.  
Kathy Boucher, President

Arvada, CO

Prairie Preservation Alliance  
Judy Enderle, President  
Denver, CO

Predator Defense  
Brooks Fahy, Executive Director  
Eugene, OR

Public Lands Without Livestock  
Mike Hudak, Project Director  
International Humanities Center  
Malibu, CA

Richard Reading, Ph.D.  
Associate Research Professor  
Department of Biological Sciences  
University of Denver  
Denver, Colorado

Rocky Mountain Animal Defense  
Christopher R. Jones, Operations Director  
Boulder, CO

Rocky Mountain Peace and Justice Center  
Boulder Environmental Activists' Resource  
Betty Ball  
Boulder, CO

Sinapu  
Wendy Keefover-Ring, Director of Carnivore Protection Program  
Boulder, CO

Judith Miller Smith, Environmental Education Consultant  
Lakewood, CO

Southern Plains Land Trust  
Nicole Rosmarino, Ph.D. President  
Pritchett, CO

Western Nebraska Resources Council  
Buffalo Bruce, Board Chair  
Chadron, NE

Western Watersheds Project Home Office

Jon Marvel, Executive Director  
Hailey, Idaho

Western Watersheds Project Wyoming Office  
Jonathan B. Ratner, Wyoming Director  
Pinedale, Wyoming

George Wuerthner, Ecologist  
Richmond, VT

cc: Charles Bedford, State Director, The Nature Conservancy Colorado  
Andrea Erickson, State Director, The Nature Conservancy Wyoming  
Mike Fuhr, State Director, The Nature Conservancy Oklahoma  
Patrick Graham, State Director, The Nature Conservancy Arizona  
Mace Hack, State Director, The Nature Conservancy Nebraska Field Office  
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Conservancy Montana  
Dave Livermore, State Director, The Nature Conservancy Utah  
Peggy Ladner, State Director of Dakotas  
Alan Pollom, State Director, The Nature Conservancy Kansas  
Carter Smith, State Director, The Nature Conservancy Texas  
Terry Sullivan, State Director, The Nature Conservancy New Mexico  
Brent Lathrop, Program Director Southeast Wyoming Program, The Nature Conservancy  
Rob Manes, Director of Conservation, The Nature Conservancy in Kansas  
Tish McDaniel, Shortgrass Prairie Project Coordinator, The Nature Conservancy  
Milnesand Prairie Preserve  
Sally Morton, Program Director, The Nature Conservancy Northeast Wyoming Program  
Bob Paulson, Program Director, The Nature Conservancy South Dakota  
Linda Poole, Glaciated Plains/Matador Ranch Project Director, The Nature Conservancy  
Gerald Reichert, North Dakota Field Representative, The Nature Conservancy  
Jeff Symstad, Conservation Coordinator, The Nature Conservancy Whitney Preserve  
The Nature Conservancy, Northern Arizona Program & Hart Prairie Preserve  
The Nature Conservancy, Eastern Colorado Program Office  
The Nature Conservancy, Aiken Canyon/Chico Basin Platform Projects