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David Tenny
Deputy Under Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 2025

Dear Deputy Under Secretary Tenny:

The American Society of Mammalogists (ASM) is a non-profit, professional scientific society consisting of over 4,000 members from the United States and 60 other countries worldwide. It was founded in 1919 and is the world's oldest and largest organization devoted to the study of mammals. In addition to its scientific pursuits, the ASM is deeply concerned about the future of mammals worldwide in increasingly threatened habitats, and thus we strongly support mammalian conservation. When decisions are made affecting the conservation of mammals, the ASM values sound conservation planning based on quality research and scientific accuracy.

We are writing now to express concern about changes in prairie dog management plans in South Dakota that would impact the conservation of the critically endangered black-footed ferrets (*Mustela nigripes*) that prey on them. Specifically, we are concerned with an emergency rule adopted by the South Dakota Game, Fish & Parks Commission that could lead to the poisoning and shooting of prairie dogs on part of the Buffalo Gap National Grassland in the Conata Basin.

Black-footed ferrets are the most endangered mammal in North America, and Buffalo Gap National Grassland is the most successful reintroduction site for them. It is well known that black-footed ferrets need large, intact prairie dog colonies to survive (e.g., Hillman and Clark 1980, Roemer and Forrest 1996). Thus, we have major concerns regarding both the legality and rationale of shooting prairie dogs on or in the buffer zone adjacent to the Buffalo Gap National Grassland.

We strongly oppose any efforts to reduce prairie dog populations in Management Area 3.63, the fraction of federal land designated as black-footed ferret recovery habitat. Reductions in prairie dog abundances have adverse impacts on black-footed ferrets and were chief among the factors that nearly caused their extinction in the first place (USFWS 1988). Poisoning and shooting of prairie dogs has already reduced prairie dog populations on U. S. Forest Service land elsewhere in South Dakota (Knowles and Knowles 1994, NWF 1998), so that now, only 1.1% of USFWS lands is occupied by black-tailed prairie dogs (USFWS 2000). This further emphasizes the importance of this area for ferret recovery. Indeed, the 5000 plus acres of Management Area 3.63 would go a long way towards meeting the USFWS recommendations of at least 10,000 acres of occupied prairie dog habitat for black-footed ferret recovery (USFWS 2000).

In conclusion, the predator-prey relationship between prairie dogs and ferrets requires that they be managed together, and that persecuting the prey would be catastrophic for this critically endangered predator. Therefore, we urge that restrictions on black-tailed prairie dog control be maintained in and adjacent to the Buffalo Gap National Grassland.

Respectfully submitted,

Guy N. Cameron

President, American Society of Mammalogists

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