

Congress of the United States
Washington, DC 20515

January 14, 2013

Mr. Daniel M. Ashe
Director
U.S. Fish and Wildlife Service
U.S. Department of the Interior
4401 N. Fairfax Dr., Suite 330
Arlington, Virginia 22203

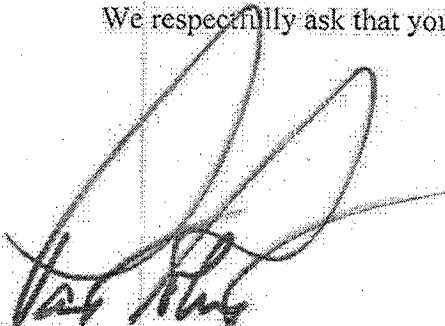
Dear Mr. Ashe:

We are writing to express our support for a 30-day extension to the comment period for the U.S. Fish and Wildlife Service (USFWS) Black-footed Ferret Safe Harbor Agreement and Environmental Assessment (FWS-R6-ES-2012-N190; FF06E16000-123FXES11130600000D2). Extending the deadline would allow affected individuals more time to review the agreement and environmental assessment.

The notice was published on December 19, 2012, and the deadline for submission is January 18, 2013. This notice, however, was published during the holiday season and many farmers and ranchers have not had the opportunity to evaluate the proposal. Providing an extension to the comment period would give interested parties the ability to thoroughly evaluate the program and provide USFWS with comprehensive comments about the impact of the proposal.

We respectfully ask that you extend the public comment period.

Sincerely,



Pat Roberts



Jerry Moran



Tim Huelskamp

CC: Ms. Kimberly Tamkun



TO: Members of the Kansas House
Agriculture and Natural Resources Committee
FROM: Alan Pollom, Senior Conservation Specialist, The Nature Conservancy in Kansas
DATE: January 22, 2013
SUBJECT: Black-footed ferrets & prairie dogs in Kansas

Thank you for considering these comments regarding prairie dog management and the reintroduction of black-footed ferrets in Kansas. I realize that this is an emotionally charged issue, which carries valid points of view from more than one perspective. Those perspectives include the rights of landowners who do not want prairie dogs on their lands; landowners who do want prairie dogs and ferrets on their lands; and citizens of every walk who recognize and value the diverse wild resource base that characterizes and enriches our state and nation. There is no need for these to be competing perspectives; and denying any one of them indicates disrespect for the values that make us Kansans and Americans.

The Nature Conservancy is a private, science-based conservation organization, with its Kansas operating unit headquartered in Topeka and conservation grazing facilities in other regions of the state. Among the Conservancy's fundamental tenants are: integrity, collaboration with private landowners, and respect for communities, cultures, and economies. We recognize that the work we do must benefit both wild Kansas and the people of Kansas; or it will not be relevant, and it will not last.

The Conservancy has a quarter-century history of conservation successes in Kansas, built, in large part, on solid relationships with private landowners. We are committed to this approach in Logan County, where we manage a 16,800-acre, full-care grazing operation known as Smoky Valley Ranch. About 2,000 acres in the interior of this ranch host a wild-reproducing population of black-footed ferrets, North America's rarest mammal. This core area is strategically buffered from other private lands surrounding the ranch, and prairie dogs are intensively managed in this buffer to prevent dispersal. This successful reintroduction alone is important to Kansas' natural heritage. I regularly receive comments of enthusiasm of people from across the state, who see stewardship of wildlife as both a private and a government obligation.

The Conservancy's efforts in Logan County, like those of a few other private landowners in the area (and across the western US), are part of a larger recovery initiative, which we hope will result in the eventual delisting of the ferret under the federal Endangered Species Act. I would mention here that there are already enough prairie dog complex acres scattered on the western U.S. landscape to delist the black-footed ferret; these complexes are simply too scattered and too dysjuncted to meet the life-cycle requirements of the ferrets. The proposed USDA-Fish & Wildlife Service program you have learned about recently, while perhaps not perfectly drafted in its current form, is appropriately designed to favor the creation of large prairie dog complexes by paying willing-participant private landowners to produce prairie dogs. The program is also designed to eliminate dispersing prairie dogs as well as entire prairie dog populations when

House Agriculture & Natural
Resources Committee

Date 1-22-2013

Attachment # 3

participating landowners choose to leave the program. Landowner groups were represented at meetings where the program was conceptualized.

The Conservancy's agreement with the U.S. Fish & Wildlife Service for the Logan County reintroduction program is predicated on the principle that neither the presence of the ferrets, nor the prairie dogs that sustain them, should hinder private grazing operations. We have clearly expressed this in multiple venues. Service officials have repeatedly, both in writing and verbally, assured us and other area private landowners that the Logan County ferrets bear a legal designation that protects landowners' interests and rights. While some subsequent legal and policy rulings imposed on local Service staff have forced minor adjustments in their approach to related issues, the Service has remained true to that important fundamental principle.

The Conservancy has been diligent and successful for many years in managing prairie dogs to prevent them from occupying other private lands adjacent to Smoky Valley Ranch. This has involved considerable effort and expense on our part. We acknowledge some mistakes and that we were not as expert in this realm early on, as we are today. I believe that our neighbors are generally satisfied with our program to protect their interests today. We are committed to continuing in this manner, as good neighbors and cooperative members of the community. As part of this endeavor, we contract with a wildlife control expert from USDA to ensure that we are addressing our neighbors' desires to keep their lands free from expanding prairie dog colonies. We have also provided direct prairie dog control assistance to our neighbors, when their individual circumstances called for such actions. To the best of my knowledge and that of my local ranch staff, there is virtually no unaddressed problem with prairie dogs (or ferrets) occupying neighboring land adjacent to the Conservancy's property. If such an issue is identified, we will, as we have in the past, address it as quickly and aggressively as possible.

In summary, The Nature Conservancy maintains a long-term commitment to stewarding the full and diverse compliment of wild species in Kansas, and to ensuring that neither black-footed ferrets nor prairie dogs associated with the reintroduction effort pose hardships on nearby landowners. The successful reintroduction of the ferrets serves the broad public interest of maintaining the state's and the nation's diverse wild resource base and possibly removing federal Endangered Species Act designation from an animal once believed to be extinct. This is a worthy cause reflected in the values of your constituents.

Again, thank you for considering these comments. Please contact me if you have questions or recommendations regarding this or other matters associated with The Nature Conservancy in Kansas.

Alan Pollom, Senior Conservation Specialist. apollom@tnc.org. 785-233-4400 (o).