

**South Dakota Chapter of The Wildlife Society**  
**Position Statement on the Petition to List Black-tailed Prairie Dogs**  
**as a Federal Threatened Species**

The South Dakota Chapter of The Wildlife Society (SDTWS) acknowledges that black-tailed prairie dogs (*Cynomys ludovicianus*) have experienced a range-wide population decline approaching 99% and suffered habitat reductions ranging from an estimated 100-250 million acres to the current estimate of 700,000-800,000 acres. Declines occurred primarily from direct habitat loss as a result of conversion of native prairies to agricultural cropland; poisoning, sylvatic plague, and recreational shooting in some areas. Most of the actual loss of habitat occurred well over 2 decades ago, but some annual losses still take place; and poisoning, recreational shooting, and the effects of sylvatic plague continue to annually reduce the remaining acreage of black-tailed prairie dogs (Schenbeck 1986, Sharps 1988, Tschetter 1988, Hanson 1988, U.S. Fish and Wildlife Service 1991, Knowles 1998). Reductions in total acreage, size of individual colonies, and the number of colonies in remaining complexes serves to fragment prairie dog habitat. Habitat fragmentation increases the probability of extirpation of local colonies, and could eventually put the survival of the species at risk.

The black-tailed prairie dog is a key component of healthy shortgrass and shrub steppe prairie ecosystems. Black-tailed prairie dog colonies provide habitat for a wide variety of predators (swift fox, ferruginous hawk, badger, golden eagle, prairie falcon, long-tailed weasel, coyote) and many species which utilize the burrows or short grass habitat created by the black-tailed prairie dog (mountain plover, burrowing owl, prairie rattlesnake, and many other reptile, amphibian, and insect species). The endangered black-footed ferret is an obligate of prairie dog towns for both food and shelter.

Long-term survival of the black-footed ferret is dependent upon preservation of healthy prairie dog populations, including both white-tailed and black-tailed prairie dogs. In addition, habitat for the mountain plover and burrowing owl, and future management of these species, possibly including the need for federal listing, is at least somewhat tied to the preservation of the habitat provided by black-tailed prairie dog complexes.

Because black-tailed prairie dogs closely crop vegetation within their colonies, the majority of the farming and ranching community has the perception that black-tailed prairie dogs are significant forage competitors with domestic livestock. Available scientific data indicate competition between black-tailed prairie dogs and livestock is less than commonly believed. Although more closely cropped, vegetation in black-tailed prairie dog towns is substantially more nutritious than adjacent rangeland. Vegetation responds to the effects of soil churning by prairie dogs, and cattle as well as wildlife benefit from increased plant diversity and nutrition created by this process (Coppock et al. 1983a, Coppock et al. 1983b, Krueger 1986, Whicker and Detling 1988).

State wildlife agencies have, in the past, deferred to state statutes or regulations which legally classify the prairie dog as a "pest". The black-tailed prairie dog is a native wildlife species and we strongly believe they should be managed as such by state wildlife management agencies.

According to the National Wildlife Federation's recent listing petition, approximately 1/3 of existing, occupied black-tailed prairie dog habitats occur within the boundaries of Native American reservations. We believe affected tribes should be included in the development of any management strategies for black-tailed prairie dogs.

### **Recommendations:**

1. We believe state wildlife agencies are in the best position to take the lead in changing the status of, and attitude toward, black-tailed prairie dogs; both within individual state governments, and with persons who shoot prairie dogs for recreation. We strongly encourage state wildlife agencies to institute management programs which recognize the prairie dog as a wildlife species and eliminate the need for listing or control as a pest by other agencies such as state Departments of Agriculture. Black-tailed prairie dogs should be managed as a legitimate component of the prairie ecosystem with acreage, distribution, and annual harvest objectives. Recreational shooting should be controlled by season and bag limit. Tribal wildlife agencies should be encouraged to institute management programs for prairie dogs on tribal trust and allotted lands containing black-tailed prairie dog habitat. Funding should be provided for these agencies to conduct black-tailed prairie dog surveys and to develop management plans and monitoring programs.
2. We do not believe federal intervention under the Endangered Species Act (ESA) is in the best interest of the black-tailed prairie dog. Black-tailed prairie dogs are widely distributed (Whicker and Detling 1988, Knowles 1995, Muihern and Knowles 1995) and the current population is viable if decimating factors are controlled. Although populations are currently depressed and losses continue, the species reproduces at a rate which enables it to reoccupy available habitat if protected after poisoning (T. Byer personal communication) or reduction by recreational shooting (Vosburg 1996, T. Byer personal communication). Recreational shooters, farmers, and ranchers from states within the black-tail's historic range are expected to mount strong opposition to listing. This resistance is likely to foster a lack of cooperation in any recovery program forced by provisions of the ESA. We believe private landowners are much more likely to respond favorably to a state-sponsored management planning process than to federal ESA listing.
3. We do not support the approach suggested in the National Wildlife Federation's petition to use black-tailed prairie dogs as a means to bring about changes in management of the prairies of the Great Plains states. While CMPS supports the goal of managing grassland ecosystems to conserve all native species, it does not believe listing black-tails is the proper means to that end. The black-tailed prairie dog issue should stand alone, and other means should be used to achieve protection of grassland ecosystems.
4. We recommend federal efforts be directed toward providing administrative assistance and funding to help states in forming a Conservation Team to develop a range-wide management planning process and a Conservation Strategy for the black-tailed prairie dog. We view the

situation as similar to that of the swift fox when that species was proposed for ESA listing in 1995. At that time, there was a lack of data on the distribution and population trend for swift fox, and management programs were not in place. A Conservation Team comprised of state wildlife agency biologists has since effectively addressed concerns for the swift fox by devoting resources to inventory, research, and development of a range-wide Conservation Strategy for this species. We recommend a similar Conservation Strategy approach be pursued for the black-tailed prairie dog. This approach should encourage tribal wildlife agency participation since many Native American reservations with the black-tail\*s historic range have some of the least human-altered grasslands. Also, given the checkerboard nature of land ownership within reservation boundaries, it is imperative that tribal and state wildlife agencies work cooperatively to develop a management strategy that incorporates the objectives and needs of both parties for all lands within these boundaries. The Conservation Strategy process will allow much more flexibility in development of management planning, and will do more to insure the long-term viability of black-tailed prairie dog populations than will ESA listing. The Conservation Strategy should include development of methods to monitor populations and trend.

5. We recommend the National Wildlife Federation and other non-government organizations support a Conservation Strategy process in an oversight role. Both non-government organizations and the U.S. Fish and Wildlife Service can help to develop sources of funding for private landowner incentive programs to protect important habitats (i.e., conservation easements). National Grasslands should be encouraged to join in the Conservation Strategy by developing management plans consistent with state objectives. This may include control of recreational shooting as per state objectives, and limited use of poisoning to maintain acreage and density objectives.
6. We recommend the federal government coordinate prairie dog control programs on public lands with the Conservation Strategy Team and state and tribal wildlife agencies to meet Conservation Strategy objectives for acreage, density, and distribution.

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