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Rick Cables, Regional Forester
U.S. Forest Service
Rocky Mountain Region
740 Simms Street
Golden, Colorado 80401

Dear Mr. Cables:

I wanted to thank you for the productive meeting February 9 regarding coordination of endangered species issues between Region 2 of the U.S. Forest Service (Forest Service) and the U.S. Fish and Wildlife Service (Service), Region 6. I am writing to followup on some of our discussions and recommendations made during the meeting to expand black-footed ferret (ferret) recovery opportunities on other National Grasslands across the central plains.

Previous Forest Service commitments to ferret recovery and its success at Conata Basin significantly advanced the overall ferret recovery. No other reintroduction effort has yet achieved the level of success of Conata Basin, and given current habitat extent and presence of plague over much of the western prairie habitats, there are few sites that can realistically hope to match that success today. Moreover, Conata Basin is an essential donor source for wild born ferret kits and has helped initiate and/or bolster reintroduction efforts at three other sites in South Dakota, as well as recovery sites in three other States. The Forest Service's contribution to ferret recovery is enormous and deserving of recognition and appreciation of the Service and all of the other partners involved in ferret recovery.

However, despite considerable recovery progress since the mid-1980s, the ferret remains a critically endangered species. Potential recovery sites across North America are limited. Perhaps no other agency or identity can contribute to more assured and rapid recovery of the ferret than the Forest Service. Ferret recovery cannot be achieved on National Grasslands alone, but likewise, the establishment of adequate numbers of ferret populations across the historical range of the species (a recovery plan objective) may not be possible without concerted support by the Forest Service and expansion of field recovery efforts across more of the Forest Service's vast western holdings. Even with more focused Forest Service management and development of additional sites for prairie wildlife, the amount of managed land actually required to meet these needs would represent a small percentage of the almost 4 million acres of National Grasslands.

The Forest Service manages more lands distributed over plague-free, high-value black-tailed prairie dog habitat than any other State or Federal agency (i.e., in North and South Dakota). There may be excellent opportunities to expand reintroduction efforts into portions of other National Grasslands in Colorado, Kansas, Oklahoma, New Mexico, Texas, and Wyoming. I

have enclosed a draft "recovery site" evaluation table currently being finalized by the Conservation Subcommittee of the Black-footed Ferret Recovery Implementation Team. That document is designed to identify existing and potential recovery areas; it shows that National Grasslands throughout the Plains States represent the greatest long-range potential to expand ferret recovery. We understand that many Forest Service sites are highly fragmented in Forest Service/private ownership and that plague is present at many as well. It may or may not be feasible in some cases to consolidate land ownership in a similar manner as was accomplished at Conata Basin. Still, the Service and other recovery partners are pursuing establishment of smaller "nursery" populations and development of plague management capabilities with a view that successful distribution of small sites in the near term may be crucial to spreading population extinction risk, while simultaneously increasing numbers and distribution in the wild. Moreover, we are working on some innovative administrative procedures (via Endangered Species Act section 10(A)(1)(a)) whereby we can implement experimental recovery actions in a more timely and cost effective manner (as opposed to requiring a costly and protracted 10(j) rulemaking process, while still ensuring the protections afforded by 10(j) on adjacent landowners). Our hope is that we can get more small populations started and maintained, while simultaneous efforts can be made to manage for expanding habitat base and consolidating land ownership.

It is important then that the Forest Service examine all possible opportunities to expand recovery efforts across grassland units. While habitats the size and quality of Conata Basin are certainly desirable, we understand that such habitat development is not possible for most units, and that actual development of suitable prairie dog habitats for ferrets may take considerable time to accomplish. Nevertheless, the planning for recovery sites/grassland unit should be initiated as soon as feasible. Wherever possible (especially on plague free units), small nursery populations of ferrets should be established on suitable complexes where 1,500 to 3,000 acres of prairie dogs occur and can be maintained and managed for ferret recovery.

Finally, it is important to understand where the recovery program stands with respect to implementation and monitoring of ferret projects. Recovery partners are now trying to establish as many populations as possible as broadly as possible across the ferret's historical range. Funding for monitoring and research that was typically involved in earlier recovery efforts is largely unavailable today. Consequently, we are looking at more "hands-off" approaches to recovery that entail only basic monitoring requirements (e.g., one fall spotlight effort/year for the first 3 years, perhaps only every 3-5 years thereafter). We know that the cost of implementing recovery actions is becoming a greater problem for partners and it has become more important from a recovery perspective to establish more and better distributed populations.

I look forward to working more closely with you and your staff on ferret recovery and other issues of mutual interest. If you would like to discuss any of these concepts further, please contact me at 303-236-7920; Mike Stempel, Assistant Regional Director, at 303-236-4510; or Mike Lockhart, Black-footed Ferret Recovery Coordinator, at 307-760-8605.

Sincerely,



Deputy Regional Director

Enclosure

D R A F T

BLACK-FOOTED FERRET REINTRODUCTION SITE EVALUATION (Updated, modified 1/10/07)

SITE	HAB	DIS	4X	MST	SCON	RePr A B C	TOTAL	RANK	COMMENTS
ACTIVE REINTRODUCTION SITES (in order of ranked priority)									
Conata Basin/Badlands, SD	5	5	40	5	3	5, 5, 5	63	1	Large, closely distributed prairie dog complexes; sustained, high annual recruitment; outstanding monitoring & scientific contributions; principal donor site of wild kits; site conservation potential diminished in recent years.
Cheyenne River Sioux, SD	4	5	36	5	3	5, 5, 1	55	2	High habitat values; developed prairie management plan; high survival & production levels; second site to contribute wild kits to other emerging reintroduction areas.
Rosebud Sioux, SD	3	5	32	5	3	3, 3, 1	47	3	One of largest overall expanses of black-tailed prairie dog acreage in North America; however, aggressive prairie dog management limits core recovery complexes; prairie dog colonies moderate size & more scattered than other sites.
Shirley Basin, WY	5	0	20	5	3	5, 5, 5	43	4	First ferret reintroduction site; impacted by plague in mid-1990s; extensive prairie dog recovery in 2000s; mixed landownership but massive geographical habitat area to support widespread, large ferret population.
Arizona	3	3	24	5	--	3, 5, 5	42	5	Perhaps best Gunnison's prairie dog site for abundance/distribution. Success, wild recruitment has improved substantially over recent years.
Kansas	4	5	36	3	3	--	42	5	Fragmented but moderate, relatively dense black-tailed prairie dog habitat with no evidence of plague.
Lower Brule Sioux, SD	3	5	32	5	3	--	40	6	Small, widely distributed prairie dog colonies; moderate potential for expansion. New reintroduction effort.
Wind Cave, SD	3	5	32	3	5	--	40	6	Small, scattered distribution with moderate potential expansion potential; important site for education benefits.
Mexico	1	5	24	5	--	3, 3, 1	36	7	Once supporting largest single colony of prairie dogs in North America, habitat now seriously degraded (grazing/drought); residual number of ferrets persist. Conservation efforts underway to improve habitat quality.
Vermejo Park, NM	3	3	24	3	3	--	30	8	Small colonies with good complex configuration; developing release site for nursery population. Good long-term conservation potential (Turner property).
Colorado/Utah	2	0	8	5	5	3, 3, 5	29	9	Scattered prairie dog colonies over extensive area; important experimental programs & contributions; on-site preconditioning & breeding pens.
Phillips County, MT	3	0	12	5	3	1, 1, 5	27	10	Locally moderate habitat values, but more widely distributed colonies; significant losses of habitat from plague in recent years; remaining ferret population minimal; outstanding scientific contributions.

SITE	HAB	DIS	4X	MST	SCON	ABC	TOTAL	RANK	COMMENTS
INACTIVE REINTRODUCTION SITES (in order of ranked priority)									
Standing Rock, ND/SD	3	5	32	--	--	--	32	11	Habitat thought to consist of moderate, scattered prairie dog complexes but data generally lacking.
Western ND	3	3	24	1	5	--	30	12	Moderate prairie dog colonies. Potential opportunity for shared National Park/NG reintroduction site.
Bad River Ranch, SD	1	5	24	1	3	--	28	13	Small but growing colonies of prairie dogs (2,900 acres). Good long term conservation potential (Turner prop).
Ft. Pierre NG, SD	1	5	24	1	5	--	28	13	Small, scattered prairie dog colonies (1,700 acres); potential for cooperative effort with Lower Brule.
Grand River NG, SD	1	5	24	1	3	--	28	13	Small but growing colonies (1,800 acres), decent Federal land base.
Ft. Belknap, MT	3	0	12	5	3	1, 1, 1	23	14	Moderate prairie dog complexes, poor prior success in reintroduction effort; area impacted by plague.
Thunder Basin, WY	4	0	16	3	3	--	22	15	Formerly with high habitat values, but compromised by two recent plague episodes. Reintro plans proceeding.
Pine Ridge Sioux, SD	5	0	20	--	--	--	20	16	Formerly largest prairie dog complex in North America; extensively poisoned; recent large plague epizootic; high potential but little/no Tribal support.
NE Utah	1	3	16	1	--	--	17	17	Private lands with small scattered white-tail colonies. No historic evidence of plague on site.
Crow Reservation, MT	3	0	12	1	--	--	13	18	Small to moderate colonies with locally suitable complex configurations; recent plague episode impacted site.
Northern Cheyenne, MT	3	0	12	1	--	--	13	18	Moderate colonies with good connection to make suitable complexes; historic plague episode, nothing recent.
Trans-Pecos, TX	3	0	12	1	0	--	13	18	Private lands. Moderate colonies, good complex configurations. No known plague in prairie dogs within area.
Custer Creek, MT	1	0	8	1	3	--	12	19	Small prairie dog population; rebounding from plague; complexes divided by river; checkerboard ownership.
Cisco Desert, UT	1	0	4	1	5	--	10	20	Moderate, scattered acreage of prairie dogs; area improving after plague episode; almost entirely public land.
Comanche NG, CO	1	0	4	1	5	--	10	20	Small/moderate prairie dog colonies; impacted by plague, apparently rebuilding; scattered public/private lands.
Cimarron NG, KS	1	0	4	1	5	--	10	20	Small/moderate prairie dog colonies with favorable complex configuration.
Rita/Kiowa NG, TX/NM	1	0	4	1	5	--	10	20	Small/moderate prairie dog colonies; impacted by plague; scattered public/private lands.

SITE	HAB	DIS	4X	MST	SCON	RePr A B C	TOTAL	RANK	COMMENTS
Pawnee NG, CO	1	0	4	1	5	--	10	20	Small, highly fragmented prairie dog colonies; potential for developing small nursery recovery site.
Pueblo Army Depot, CO	1	0	4	1	5	--	10	20	Small, but well distributed colonies that could be intensively managed for a nursery site.
Navajo Reservation, AZ	1	0	8	--	--	--	8	21	Current data limited; widely distributed population of Gunnison's prairie dogs.

Hab = Habitat Factors; Dis = Disease Factors; 4X = Adjusted Weight Factor; Mst = Management Status; Scon = Site Conservation Factors; RePr = Reintroduction Program Attributes; NG = National Grassland, administered by USDA Forest Service.

Habitat Factors

- 5 = Black-tailed prairie dog; 15,000-20,000+ acres with large core complexes, closely distributed, and relatively high densities (e.g., Conata Basin, SD)
- 5 = White-tailed prairie dog; mix of small, moderate and large colonies distributed over massive geographic area (e.g., Shirley Basin, WY)
- 4 = Black-tailed prairie dog; 8,000-15,000 acres with moderate/large core complexes but more widely distributed
- 3 = Black-tailed prairie dog; 2,000-8,000 acres, smaller/moderate complexes, more widely distributed
- 3 = White-tailed/Gunnison's prairie dog; large, relatively closely distributed complexes
- 2 = White-tailed/Gunnison's prairie dog; large complexes, more widely distributed
- 1 = Black-tailed prairie dog; residual, highly fragmented complexes
- 1 = White-tailed/Gunnison's prairie dog; small-moderate complexes, widely distributed

Disease Factors

- 5 = No historical evidence of plague on or within 20 miles of reintroduction area
- 3 = Documented plague within 20 miles of reintroduction area, but core release areas with no recent documented evidence of plague
- 0 = History of plague within, or immediately adjoining, release area(s)

4X Biological suitability of the site (i.e., both the quality of the habitat and the occurrence of plague) is given substantially greater weight in an evaluation of overall reintroduction site merit. This same weight factor has been used by the Fish and Wildlife Service since 1996 to develop allocation priorities for distribution of ferrets to reintroduction projects. The sum of the scores for habitat and disease are multiplied by a factor of four.

Management Status

- 5 = All rulemaking, planning and approval processes necessary to implement reintroduction program complete; reintroduction efforts underway
- 3 = Active planning to implement recovery program
- 1 = Expressed interest/preliminary planning
- 0 = No expressed interest/planning

Site Conservation

- 5 = Reintroduction area comprised of predominantly Federal and/or State public lands with assurance of long-term ferret conservation
- 3 = Federal, State, Tribal, or private lands (or mixtures) with conservation agreements and/or moderate potential for long-term conservation of ferret populations
- 0 = Reintroduction area includes substantial private, or Tribal lands with no specific conservation easements/agreements for ferret management

Reintroduction Program Attributes

- 5 = Demonstrated high short term, post release ferret survival; good long term survival (over multiple years) demonstrated
- 3 = Moderate to high short term survival; little or no know long term survival; or modest long term survival
- 1 = Low to moderate short term survival rates; minimal documented long term survival; or, survival significantly reduced from previous levels
- 5 = Active/successful reintroduction effort, substantial wild production, likely self sustaining, donor site for translocation of wild kits
- 3 = Active reintroduction effort, documentation of wild production over successive seasons
- 1 = Inactive reintroduction project; active but with minimal documentation of wild production; or, previously successful but compromised by disease or management problems

5 = Significant scientific contributions to recovery programs (i.e., intensive experimental practices re. population monitoring, predator management, disease management, pen breeding, etc.)

3 = Moderate levels of scientific contribution to recovery program

1 = Employs basic procedures to monitor prairie dog and ferret populations