



Union of Concerned Scientists  
Citizens and Scientists for Environmental Solutions

October 29, 2007

Gunnison's Prairie Dog Comments  
U.S. Fish and Wildlife Service  
764 Horizon Drive, Building B  
Grand Junction, CO 81506-3946  
[gunnisons\\_pdog@fws.gov](mailto:gunnisons_pdog@fws.gov)

**Re: Gunnison's prairie dog**

Dear Mr. Thompson,

The following comments from the Union of Concerned Scientists (UCS) Scientific Integrity Program are in regards to the 12 Month Finding on a Petition to List the Gunnison's Prairie Dog as Threatened or Endangered (72 FR 49245), open until Oct 29, 2007.

UCS requests that the U.S. Fish and Wildlife Service ensure that the 12 month finding for the Gunnison's Prairie Dog be free of the political interference that marred the 90 day petition determination for this species. Listing decisions must be based on the best scientific and commercial data available, as required by the Endangered Species Act.

Freedom of Information Act documents obtained by the nonprofit Forest Guardians have shown that the Gunnison's prairie dog 90-day petition determination was interfered with by political appointee Julie MacDonald, former Deputy Assistant Secretary for Fish, Wildlife and Parks. Mrs. MacDonald has since resigned after an Inspector General investigation into her widespread manipulation of Endangered Species Act listing determinations, and FWS has announced an official review of eight ESA decisions due to her interference. Memos released during this official review process show that the Regional Director of Region 6 determined that Mrs. MacDonald's interference did not affect the final outcome of the 90 day process, a claim which is suspect considering the contents of the FOIA documents mentioned above.

As of Jan 19, 2006, the Gunnison's prairie dog was on track to a substantial 90-day finding, as can be seen from the FOIA documents:

“We have determined that substantial information is presented in the petition and available in our files to indicate that sylvatic plague may threaten the Gunnison's prairie dog such that listing may be warranted.”  
(USFWS email dated January 19, 2006 at p. 31.)

However, intervention by MacDonald through political appointee Chris Nolin reversed this petition finding for the prairie dog. In an email dated 1/19/2006 titled “Gunnison

pd,” Nolin writes “Per Julie please make the pd finding negative.” It is clear that this command was implemented. The section above was rewritten to read,

“We have determined that information in the petition and readily available in our files do not constitute substantial scientific information that disease or predation are threats to Gunnison’s prairie dog such that listing under the Act may be warranted. We recognize that sylvatic plague has been and continues to be a major mortality [sic] factor for Gunnison’s prairie dog, but the impact that this disease has had on the overall status of the species remains unclear. More information on the impacts of disease, specifically sylvatic plague, with regard to persistence of Gunnison’s prairie dog populations is needed.” (USFWS email dated January 23, 2006 at p. 28.)

The final federal register announcement (71 FR 6241) reflected these changes to which reversed the consensus of FWS scientists and downplayed the threats to this species.

In light of this clear political interference, UCS requests that FWS make the 12 month finding process for the Gunnison’s prairie dog transparent and free of political influences. The Endangered Species Act requires listing decisions to be based on the best available science, and FWS should endeavor to conduct a listing review which maintains the highest standards of scientific integrity.

Sincerely,

A handwritten signature in black ink that reads "Francesca T. Grifo". The signature is written in a cursive, flowing style.

Francesca T. Grifo  
Director and Senior Scientist  
Scientific Integrity Program  
Union of Concerned Scientists

About UCS: The Union of Concerned Scientists is a leading science-based nonprofit working for a healthy environment and a safer world. The UCS Scientific Integrity Program mobilizes scientists and citizens alike to defend science from political interference and restore scientific integrity in federal policy making.