

February 14, 2004



FAX/COVER LETTER

ATTEN: Philip L. Chao

2503 14 FEB 25 2004

RE: CDC/FDA Ban on prairie dogs. FDA docket #2003N-0400

THE MONKEYPOX SCARE IS OVER! It faded quickly, with only a few people getting ill, one seriously, but all victims recovered completely. Hundreds of animals, specifically prairie dogs have been euthanized needlessly, 1) because the government wanted to test for Monkeypox, even though most PD's did not show signs of illness and only a few were actually found to be infected with the disease, and 2) because many wholesalers and pet stores could not afford to feed and board the animals and had no alternative.

Living in times of potential bio terrorism, the ban was the responsible thing to do at the time. However, eight months have gone by without a single hint of Monkeypox. There are approximately 3000 prairie dogs held by rescuers, relocators, and pet stores. These are transitory pets, who normally would be moved out to adoptive homes quickly. The estimated cost nationally to board, feed, and care for these animals over a period of eight months, is \$360,000.00, not including veterinary care. These are tax payers, who couldn't in good conscience, have these animals killed. Now they continue to bare the burden. There are numerous professional rescuers/relocators that have lost a portion or all of their lively hood. And there is major concern that the current breeding season (prairie dogs only breed once a year), will see ranchers, who previously allowed rescuers to control PD's populations on their land, return to extreme measures for removal.

The government's ruling is so restrictive, prairie dog owners cannot board their animals to go on vacation; terminal patients cannot will their beloved pets to be cared for after they die, because the ban says the animal must be euthanized; responsible owners can't place their animals in a more appropriate home, when circumstances change in their lives; and if a PD owner has an emergency, they can't ask a friend or neighbor to care for their pets, because the government says they would be exposed to the risk of Monkeypox. These restrictions are oppressive to the extreme and need to be lifted immediately.

There are powerful organizations, that signed on to the Animal Protection Institute's heartless recommendation to make the ban on prairie dogs permanent and to phase them out as pets. They prefer a species already threatened, to be pushed further towards extinction, rather than make provisions for responsible pet adoptions. Attached are letters to refute the API's recommendation to the FDA, which was based on erroneous assumptions, misinformation, and blatant fabrication.

This letter represents over 2000 experienced PD experts from the following groups:

Creating GreenPiece.com, Citizens for Prairie dogs, Prairie dog pet forum, PMS Relocators, Gena Seaberg Consultant, LUV-R-PDS, and Prairie Dog Advocates

**2003N-0400**

**C 80**

February 11, 2004

Animal Protection Institute

RE: Prairie dog docket comments.

Dear Ms. Engebretson,

The opening line of your comment, "the popularity of prairie dogs as pets has done more to endanger prairie dogs, than preserve them", truly exemplifies the superficial depth of your knowledge and an amazing lack of credibility for the Animal Protection Institute.

Any unbiased, thoughtful, open scrutiny of the prairie dog situation for decades, would invariably form the opposite conclusion. The National Wildlife Federation and other conservations groups are still struggling to have prairie dogs reclassified as wildlife, instead of the current classification of vermin or pests. This classification has allowed the species to be an open and unchecked target on public lands, private lands, and by city, state, and federal entities.

One terrible situation is going on right now in Lubbock, Texas. A development project is currently paving over a prairie dog colony, trapping them underground, with no hope of survival. Across town, The Citizens for Prairie Dogs organization is underway with plans to relocate and house 80-100 starving prairie dogs, until their 7 acre tract of land can be replanted and water systems installed. Those prairie dogs received no aid from the city and have been in pathetically poor condition, with little growth from last year, missing tails and appendages, chewed feet, missing fur, and exposed ribs. No matter what rhetoric the Animal Protection Institute espouses, you cannot invalidate these horrendous facts, simply by ignoring them and blaming the pet industry for prairie dog demise. Extinction by natural process cannot be compared to extinction by genocide.

The API and its supporters, see everything in black and white, when the prairie dog predicament is a series of gray complexities. You cannot speak with any wisdom or authority, without exploring the other side of the equation, which you clearly have not. The sad fact is, there are very few public lands available that would support prairie dog life. According to NWF, the endangered Utah prairie dog relocation effort has failed, because after relocation, the colonies all died off. Conservation efforts continue, but development continues faster.

Your comments underestimate the prairie dog's ability to adapt to a human family. They are communal creatures and will easily bond to a human family, as they would their own. Because prairie dogs are born in the wild, their natural instincts remain with them through out their lives. They gleefully "communicate" with their human families as they would their own in the wild. Prairie dogs have been denied the "laws of natural selection" you talk about, by decades of habitat destruction and colony eradication, not by responsible pet owners. Most rescuers bring out the entire colony, not just the pups, and they do it as

humanely as possible. In the case where they do rescue only the pups, it is because a compromise has been reached with the rancher, who is willing to allow prairie dogs on his land, as long as the population is kept stable. The problem is, available land, with vegetation to support the animals is so scarce. You claim there are still vast areas of prairie dog habitat that remains and that is true, but the reason prairie dogs no longer inhabit those lands, is because they have been eradicated. The only way PD's could be relocated to those public and private lands, would be if the original custodians agreed to have them reintroduced. Conservation groups, like NWF are making some head way with education of ranchers, etc., but old attitudes die hard.

The most amazing thing about your comments, is the inaccurate and radical conclusions regarding captive breeding of prairie dogs. I would like to see where you get your information. Prairie dogs only breed once a year in the wild and are rarely bred successfully in captivity, because they require specific underground tunnels and chambers, that are not easily recreated. You are laboring under the misconception that breeding prairie dogs is like breeding rabbits; put a male and female into a cage and off you go. By extension, you make the radical and bizarre prediction that prairie dog breeders will start mutating the species. You dismiss having prairie dogs as pets, because humans are simply selfish. I can't think of anything less selfish, than the extraordinary lengths PD owners will go through for their pets, in both habitat creation, medical care, and preservation in the wild. Yes, there may be a small percentage of owners, who aren't a good match for prairie dog stewardship, just as there are some parents who beat their children, but you don't punish the entire race. You claim that adopting prairie dogs as pets is an exercise in futility, because eventually, there won't be enough human households to help the cause. The brain swirls with astonishment. The last I checked there were something like 6 billion humans on this planet.

I'm sure your organization accomplishes many good things, but you are way off track on this one. How can you claim that prairie dogs must remain in the wild, without offering up a single solution to the fact that they are dying in the wild? Companies like yours and individuals like yourself, have a consciousness that cannot be raised, while you are living under a veil of denial and ignorance. We will continue to make every effort to communicate with people, who have a voice of reason, even if it is different from ours. Obviously, your company does not fall into that category and it is truly unfortunate.

Jean Williams  
President  
Creating GreenPiece.com