

Kansas Farm Bureau
Policy Statement

Senate Committee on Natural Resources

**SR 1711; Opposing the black-footed ferret programmatic
safe harbor agreement**

February 14, 2013

Testimony provided by:

Michael Irvin

Legislative Counsel - Governmental Relations

KFB Governmental Relations

Chairman Powell and Members of the Committee:

Thank you for this opportunity to provide written testimony on Senate Resolution 1711 opposing the black-footed ferret programmatic safe harbor agreement and environmental assessment. I am Michael Irvin, Legislative Counsel - Governmental Relations for the Kansas Farm Bureau (KFB).

KFB stands in support of SR 1711.

KFB is the largest general farm organization in Kansas, representing over 40,000 farm and ranch families in all 105 counties. These Farm Bureau members produce livestock and crops that would be directly affected by the U.S. Fish and Wildlife Service (USFWS) action of introducing the Black-footed Ferret (BFF) under the Safe Harbor Agreement.

Our organization has been contacted by a number of members who have or are being affected by the increased nuisance created by the explosion of prairie dogs in our state. Many of these same landowners are now facing a new obstacle regarding the planned release of the more BFF through the proposed Safe Harbor Agreements.

Initially, we did not have very much information about this issue, but now we have determined that action must be taken in order to protect our members. Therefore, our organization feels compelled to discuss our concerns with the proposed USFWS Draft Assessment (EA), Enhancement of Survival Permit Application, and Draft BFF Programmatic Safe Harbor Agreement and to convey our opposition to the plan that has been proposed.

We have six primary causes of concern:

- The BFF Program has been and continues to be a heavy-handed federal encroachment on private property rights
- The USFWS has failed to conduct an Environmental Impact Statement (EIS) for the reintroduction of the BFF's. This includes lack of study as to the impacts on economic; historic, culture and social elements of the human environment; and the rural ecosystem
- Failure of the USFWS to produce a baseline benchmark for the BFF reintroduction
- The Agreement is riddled with problems for participants as well as adjacent landowners
- The USFWS lack of regard for sound science (i.e. migration and control of the prairie dogs and BFF's. An example - inadequate barriers surrounding BFF release sites)
- The USFWS fails to provide regulatory protection for adjacent and/or surrounding landowners

Unfortunately, the manner, time, implications, and consequences of the proposal have made landowner adaptation and participation much more challenging than should be the case. Further, adjacent and surrounding landowners are placed in a quagmire, since they have not been provided with any financial rewards, remedies or protections afforded the participants. This leads to an inadequate, unjust and unfair proposal that our organization and members adamantly oppose.

For private landowners, this process is alarming. Our members have been down this road before when the USFWS reintroduced the BFF's in Logan County during the later part of 2007. Our members felt their concerns were certainly not addressed nor considered prior to this release. In addition, the service has repeatedly failed to cooperate and provide documentation to the Logan County Commissioners during coordination meetings.

The vast majority of landowner/members take tremendous pride in being good stewards of their natural resources. This resource is their livelihood. This plan will disrupt the balance that farmers and ranchers already maintain.

We appreciate the opportunity to present these comments today. KFB stands ready to assist this committee as you consider this important issue.