

# TEXAS DEPARTMENT OF AGRICULTURE

TODD STAPLES  
COMMISSIONER



August 8, 2011

The Honorable Ken Salazar  
Secretary of the Interior  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

Dear Secretary Salazar:

Thank you for the opportunity to comment on the U.S. Fish and Wildlife Service's (FWS) proposal to institute a permitting system for the captive breeding of the scimitar-horned oryx, addax and dama gazelle.

In the proposed rule, FWS acknowledges the value of breeding programs and their benefits to enhancing, not harming, the antelope species. For this reason, I believe regulating the domestic management of these animals is beyond the fundamental intent of the Endangered Species Act. Now is a time to withstand the call for overly burdensome and unnecessary regulations and to protect the rights of private citizens who have responsibly promoted the conservation of these antelopes.

Instituting a permitting system based on the animals' status on another continent, which has drastically different values and assets than those found in Texas, dismisses the successes of domestic management efforts. Further, instituting a regulatory scheme that infringes on the free market and private property rights systems that has encouraged successful wildlife and habitat development in the Lone Star State is counterproductive for landowners and the species.

The exotic wildlife industry annually generates an estimated \$1 billion in economic activity in Texas, and property owners often participate in wildlife management to supplement the financial demands of land ownership. In this case, permitting could replace these incentives with a range of regulatory costs, discouraging conservation and resulting in losses to the antelope species, as well as to valuable habitat that supports other plants and animals.

Thank you for your consideration of these comments and for your efforts to work with the exotic wildlife breeders who are great stewards of our natural resources. Please feel free to contact me if I may provide additional information or assistance.

Sincerely yours,

Todd Staples

TS/KH/kh

