

Comments	How comment dealt with
Is there a way to change the format of the document so when you print- it automatically changes from portrait to landscape as appropriate from page to page, vs. <u>cutting off half the page?</u>	We formatted the document so that it automatically changes from landscape to portrait.
This plan presents a menu of options for conserving prairie dogs, but implements none of them – addressing the on-the-ground needs of prairie dogs is punted to an Implementation Plan that will be created at some undisclosed later date. This plan will not directly contribute to the conservation of either species.	IPA action plans will be developed through a public involvement process. Action plans will be developed for a 3-5 year period. Please see Implementation Process section page 176. Individual action plans will be an addendum to this Strategy when completed.
While we strongly urge CDOW to include implementation in the conservation plan itself, if the agency insists on delegating that task to an Implementation Team, we <u>would like the opportunity to be part of such a team.</u>	We are not developing a team at the current time. Individual IPA action plans will be developed through a public involvement process (see page 176). If a team is developed we will invite your participation.
Contrasting the PVA findings to the strategies outlined in the plan, we find the plan deficient: 1) it does not provide focused management attention on ensuring higher juvenile female survival rates and female reproductive success; 2) it fails to provide populations from the full range of anthropogenic and natural stressors (and, indeed, it would be impossible to protect them from the latter unless in a laboratory setting; however, the anthropogenic threats can largely be reined in); 3) while it provides for flea dusting, it is not clear where and when that will take place; 4) the plan does not provide for statewide seasonal closures on shooting, nor does it (or likely can it) provide shot populations with insurance against plague; and 5) the plan does <i>nothing</i> to address the extent or frequency of poisoning.	The PVA is only a tool for investigating current and future risk of GUPDs and WTPDs population decline or extinction. The need for and consequences of alternative management strategies can be modeled to suggest which practices may be the most effective in managing prairie dog populations. Many researchers have cautioned against the exclusive use of absolute results from a PVA in order to promote specific management actions for threatened populations (e.g., Ludwig 1999; Beissinger and McCullough 2002; Reed et al. 2002; Ellner et al. 2002; Lots et al. 2004). Instead, the true value of an analysis of this type lies in the assembly and critical analysis of the available information on the species and its ecology, and in the ability to compare the quantitative metrics of population performance that emerge from a suite of simulations, with each simulation representing a specific scenario and its inherent assumptions about the available data and a proposed method of population and/or landscape management. Strategies were thus developed with the PVA in mind. Adaptive management will be used to evaluate success of implemented strategies on populations.

<p>We hope that the PVA is further refined, as we question some of its assumptions:</p> <ul style="list-style-type: none"> <li>• All four baseline model scenarios predicted no probability of extinction for even very small populations, in contrast to field observations where colonies frequently do become extinct now that plague is present throughout the ranges of both species</li> <li>• The model assumes that white-tailed prairie dogs' mean litter size at weaning is 5.47;</li> <li>• The model assumes that 100% of yearling males of both prairie dog species breed, despite acknowledging that 50% of male white-taileds breed as yearlings (p. G-6). Hoogland (2001) found that only 24% of male Gunnison's breed as yearlings.</li> <li>• In analyzing shooting and poisoning, the model appears to assume that there are "plague-free" prairie dog populations in Colorado, despite the fact that plague encompasses the entire range of both species.</li> <li>• The model assumes that shooting results in mortality of only 5-20%. The scientific literature has found and tested much higher shooting rates.</li> <li>• It is not clear that the model accounts for the partial nature of seasonal closures: they only apply on public land, not private. The plan recognizes that the majority of the Gunnison's prairie dog's range and 44% of the white-tailed's range occur on private land (Table 2 at p. 24). Half, or nearly half, of these prairie dogs therefore do not benefit from a seasonal shooting closure.</li> </ul>	<p>The PVA will not be re-run. We used the best data available at the time to run the model. We asked Dr. Hoogland, as well as other experts, to help us determine the demographic parameters to be used in the model. We held a 2-day workshop with experts to determine the parameters to use, and we contacted additional experts for clarification when needed. We developed four baseline models to examine extinction rates through time. In the baseline models, we had no risk analysis attributed to them. The reason we did not limit the PVA to only two baseline models (one for each species) is because we recognize plague is in the system, and thus we developed baseline models both with and without enzootic plague for both species. We assumed that 100% of yearling males breed because they can breed at 1 year of age. We do not have good estimates of shooting pressure of GUPD and WTPDs and so estimated what we thought was a realistic range-wide shooting pressure from anecdotal evidence from local biologists. We could not include the impacts of shooting closures on public versus private lands. But we were able to demonstrate that the shooting closure reduced the extinction rate.</p>
<p>The PVA also does not address habitat destruction, which results in loss or reduction in prairie dog populations. Indeed, Miller notes that PVAs generally underestimate threats:</p>	<p>Correct, this was not modeled in the PVA. We modeled threats for which we felt we had sufficient data for modeling with some certainty.</p>
<p>Many of the objectives and strategies outlined, some of them flowing from stakeholder workshop recommendations, are aimed at politically and socially palatable measures, rather than what is necessary to address biological threats.</p>	<p>Public education is needed to promote techniques for protection of prairie dogs and to describe the ecological importance of prairie dogs. Prairie dogs can cause problems for individuals and at times private landowners may need to control populations.</p>
<p>The plan should serve more as a recovery document, and then if the plan is successful and prairie dog populations recover they can be removed from the endangered species list. The Gunnison sage grouse is a good example. That plan has been in operation for 12 years and sage grouse still have not recovered. The impacts threatening Gunnison sage grouse don't come close to what's happening to and within PD populations.</p>	<p>This is not a recovery plan, as neither Gunnison's or white-tailed prairie dogs is listed as threatened or endangered. We have removed references to recovery plans. We are working to develop action plans for each IPA.</p>

<p>I did not find the current conservation efforts currently being implemented in any of the IPAs, other than the Northwest population IPA, sufficient to recover PD. The only actions being implemented presently are the seasonal shooting closures, a few studies and some monitoring. Even though the Forest Service may have identified PD as a sensitive species it doesn't provide much protection since 97 percent or more of the PD colonies are on BLM and private. Unfortunately, BLM and private lands do not have stipulations that protect PD habitat.</p>	<p>This plan is the start of the process for conservation, but Colorado has been active in working to manage the species by developing an occupancy approach for long-term population trend monitoring, implementing a public lands seasonal shooting closure, conducting a GUPD statewide genetics study, plague surveillance and research, and helping Dr. Hoogland conduct his WTPD behavioral research in North Park.</p>
<p>How many IPAs have a federally-mandated action plan that incorporates PD management? I am not aware of any management plans on BLM lands other than in the Northwest IPA that incorporated PD issues in them.</p>	<p>None.</p>
<p>If there is a lack of quantifiable data to evaluate the status of the species on tribal and private lands then this is all the more reason to support listing unless the working group is assuming there are large numbers of PD in these areas that have not been inventoried and there is no threat to them.</p>	<p>This information is needed. We need to work to get all stakeholders engaged in reporting on local prairie dog distribution and cooperating with CDOW on our range-wide monitoring efforts (occupancy modeling).</p>
<p>The report is littered with many craven statements such as could be, may have, maybe, suggest, possible, etc. If the committee is not sure the decline of the GUPD and WTPD is directly related to the multiple of factors listed and described in the plan, then what other factors could possibly be causing the decline?</p>	<p>Currently we do not have any cause and effect data on the demise of prairie dog populations or colonies from any cause other than plague and historic poisoning efforts. Without clear cause and effect data, we opt to incorporate the use of the wording "may impact "since we are relying on biological opinion or correlative data. Thus, we believe that we have accurately represented the available literature.</p>
<p>In factor #3 include not only historic but current poisoning efforts. Not only has historic poisoning contributed to the decline of these species, but poisoning programs going on today throughout the state are still adding to the decline.</p>	<p>We are unable to track the amount of poisoning occurring today, since CDOW does not have regulatory authority for use of toxicants. We incorporated a strategy to help track the amount of poisoning occurring and where. It is clear, however, that the scale of poisoning has been reduced due to little or no poisoning occurring on public lands.</p>
<p>We commend you for stating in the Plan that you desire to ensure long-term viability for the Gunnison Prairie Dog (GUPD), <u>negating the need for protection under the ESA</u>. The GCSA has not seen demonstrated need to federally list the GUPD, and will look to the CDOW to adamantly oppose the listing of the GUPD.</p>	<p>The CDOW believes that state management is generally superior to federal management for wildlife species particularly non-migratory. Our policy is to "...preserve, protect and enhance wildlife species that may be at risk of becoming threatened or endangered."</p>
<p>We also appreciate that you have provided conservation strategies in the Plan, rather than guidelines or standards.</p>	<p>Thank you for your comment</p>
<p>We find the Plan to be grossly lacking in public involvement, so lacking that the long list of comments we, and others have generated, could have been avoided through better public involvement. A much better Draft Plan would have been presented.</p>	<p>CDOW has revised the plan Implementation Process (page 176) that will rank issues and prioritize strategies for implementation based on a stakeholder workshop. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has agreement from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs.</p>

<p>we recognize that the CDOW hosted a 3-day Prairie Dog workshop in Grand Junction. This workshop was held prior to the USF&amp;WS listing of the GUPD as a Candidate Species 2, and speaking for our organization, the threat of a federal listing was not seen as a possibility at the time of the CDOW workshop, and our level of attendance reflected that. In addition, we feel strongly that landowners such as the GCSA who, due to their very livelihood provide GUPD habitat, and non “urbanized”, non developed land, should be brought into the process at the onset of developing a GUPD conservation plan, and kept in the process throughout the formation and implementation of such a Plan. As the Plan points out on page 24, private land makes up in many cases, more acreage of ownership in IPA’s than federal and state lands, yet the CDOW through this process, placed the private landowner at the same public involvement table as, for example, The Center for Native Ecosystems.</p>	<p>CDOW has revised the plan Implementation Process (page 176) that will rank issues and prioritize strategies for implementation based on a stakeholder workshop. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has agreement from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs.</p>
<p>The GCSA advocates for the CDOW to recognize the importance of having a Conservation Strategy Plan for <u>each</u> of the Gunnison’s and White-tailed Prairie Dog. It can only mean more clarity and “localness” in the respective plans. In addition, the USF&amp;WS twelve month finding the GUPD as a candidate 2 species is imminent, and much focus is on this particular species. Combining it with the White-tailed only adds confusion, where affected entities seek clarity.</p>	<p>We believe that the process of addressing common issues in this conservation plan, with specific actions to conserve populations in local areas is more practical and efficient, and, in light of potential federal action on GUPD and the status review for the WTPD coming out in 2010, more timely than splitting the plan into two separate documents.</p>
<p>It is not clear as to the signatory(ies) of the Plan.</p>	<p>This plan will be signed by the Colorado Division of Wildlife's Director. There will be no other signatories.</p>
<p>CDOW species range maps are not the same as the USF&amp;WS maps.</p>	<p>You are correct - our maps are different. We are trying to work with the USFWS to ensure consistency. We developed our maps prior to the publishing of the federal register map produced by the USFWS for the GUPD candidate listing.</p>
<p>There is no discussion in the Plan as to population or condition of the GUPD outside of Colorado, which would give the reader a sense of broader population data.</p>	<p>Please see the WAFWA multi-state Conservation Assessment. This plan is a Colorado Plan and not a range-wide assessment. The states, through WAFWA, did complete a range-wide assessment for both species, which is available on <a href="#">the CDOW web site</a>.</p>
<p>Some of the population data collecting was performed in drought years, where one would expect lesser populations.</p>	<p>You are correct - some mapping was completed in drought years. This was noted in the document.</p>
<p>Mapping of colonies appears to be inadequate and not representative.</p>	<p>You are correct - our mapping is incomplete and not exhaustive. We were attempting through our efforts to develop a distribution map of prairie dog colony locations that will have limited uses, for example, this data will be insufficient for <u>determining occupied acres or monitoring individual colony status through time</u>.</p>
<p>it appears uncertain where funding would come from for implementation of the many monitoring, analysis and education objectives listed in the Implementation Process section of the document. It is imperative that CDOW and other parties responsible for implementation of document objectives obtain adequate funding in order to realistically meet this plan’s stated purposes and goals.</p>	<p>Funding for prairie dog conservation, as for all CDOW activities, is dependent on legislative spending authorization and availability of funding. Partnership funding will be sought to implement strategies.</p>

<p>Increasing stakeholder and other agencies' participation in prairie dog conservation is listed as both a stated purpose and stated goal in the document. We are troubled that CDOW did not completely meet this goal in that only one meeting involving GUPD issues within the document was held during the development of the plan. We believe that CDOW has a responsibility, as stated in the document, to involve stakeholders in the conservation of GUPDs and request that this be done adequately before the plan is finalized.</p>	<p>CDOW has revised the plan development process. See the new Implementation Process Draft#2 of the document. that will rank strategies for implementation based on a stakeholder workshop. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has consensus from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs.</p>
<p>CCA would request the opportunity to comment on all additional versions of the Plan until the Plan's finalized version.</p>	<p>A revised second draft will be available to stakeholders to review and comment on before issuing a final version of the plan.</p>
<p>Landowners have, and will continue to, play a vital role in species preservation. The majority of the states wildlife habitat exists on private property and with agriculture land conversion reaching levels of 380 plus acres per day, this could be the greatest threat to any species inhabiting the state. Therefore, and of special concern, is the need NOT to implement regulations that will inhibit sustainable agriculture production in the state and ultimately deteriorate habitat for the Gunnison and White-tailed Prairie Dogs.</p>	<p>CDOW does not have the authority to control landuse. Local IPA action plans could be developed to manage landuse as part of a suite of strategies to be implemented to conserve GUPD and WTPD populations.</p>
<p>CCA requests that the DOW add a subsection of the Plan's Purpose (page 1) that outlines how the Plan should be employed by other agencies, NGO, researchers, etc. In many cases, DOW species' Plans get referenced out of context in federal and state land grazing documents to qualify management actions of decisions by said agencies. As noted, this Plan is an adaptive, process-orientated document, and in no way represents a refereed scientific document based on statistically accurate research. Therefore, a qualifying section should be added to outline these basic principles when employment of the Plan is considered.</p>	<p>CDOW cannot control how others use the information in the plan. The information is clearly identified as to its validity and scientific background.</p>

<p>We suggest a Chapter 1 that addresses the topic of disease, and clarifies that disease has an entirely greater and different level of impact on prairie dogs than all the other impacts described in the Plan. We propose Chapter 2 would list all other issues and describe their impacts on the prairie dogs. The Chapter 2 issues are: agriculture, associated species, energy and mineral development, genetics, poisoning, population monitoring, population reestablishment, rangeland condition, recreational shooting and urban development. As the plan is currently organized it tends to minimize the importance of disease (despite several statements to the contrary contained in the Plan), and elevate the impacts of all the other issues to the same level as disease. The current layout organizes all issues, including disease, into an alphabetized listing that does not pedestal disease as the primary threat to prairie dogs. We suggest modifying the document to place disease in Chapter 1 and thoroughly strengthen the discussion of how disease impacts prairie dogs at an entirely greater level than all the other issues. Our proposed Chapter II should identify all the Chapter II issues as secondary strategies compared to the Chapter I issue, disease. We do not believe this proposal</p>	<p>Disease is highlighted as the greatest threat to prairie dog populations. The format of the document follows the WAFWA conservation strategy. Ranking of issues by CDOW was removed from the plan as well as ranking of strategies in Appendix F. CDOW has revised the plan development process. See the new Implementation Process in Draft#2 (page 176) that will rank strategies for implementation based on local stakeholder workshop. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has consensus from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs.</p>
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<p>Moffat County requests a section of this plan describing the Prairie Dog's impact on its own habitat.</p>	<p>Little research has been completed on the impacts of GUPD and WTPD on their habitats. Most of the research has been completed on BTPDs in response to questions arising as to their competition with cattle; however, the BTPD range is different from either the GUPD or WTPD range and their behavior is different. The following literature addresses differences of vegetational communities on and off prairie dog colonies and was added to the plan (page 154): Grant-Hoffman and Detling (2006) measured vegetation cover, canopy height, species diversity, and nitrogen concentration on and off 6 GUPD colonies in southwestern Colorado. They found few vegetative differences between prairie dog colonies and non-colonies. Bangert and Slobodchikoff (2000), however, found that the presence of GUPD colonies increased habitat heterogeneity at the landscape level and that this heterogeneity is potentially important to a wide variety of animals. We will add a strategy to investigate the potential impact of GUPD and WTPD on the landscape. Added discussion in Rangeland Condition Section: Questions have arisen as to the role of GUPD and WTPD populations on the spread of invasive weeds across the landscape. GUPD and WTPDs are a disturbance species, and have the ability to activate dormant seed banks through their burrowing activities and consumption of non-native weed seeds that can be dispersed in the fur and feces of the animals. They can also indirectly affect hydrology and nutrient cycling through their burrowing and grazing activities (Whicker and Detling 1988 in Fahnestock and Detling 2002); however, the limited amount of research conducted on GUPDs and WTPDs found few vegetative differences between prairie dog colonies and non-colonies in relation to vegetation cover, canopy height, species diversity, and nitrogen concentration (Grant-Hoffman and Detling 2006).</p> <p>BTPDs are the most widely studied prairie dog species, and research has shown that their effects on rangeland condition are not uniform, and that effects are probably dependent on age of colony, climate, and vegetational community structure (Johnson-Nistler et al. 2004). Activities associated with BTPD colonies can cause a reduction in grass biomass, an increase in bare ground, and an increase in forb biomass (Fahnestock and Detling 2002, Johnson-Nistler et al. 2004). Some studies have found that exotic species of plants become more common at on-colony sites than at off-colony sites (Fahnestock in press). This may indicate that BTPD colonies can be important sites for the establishment of exotic species or as a reservoir for their seeds (Fahnestock in press). Other studies, however, have shown a decreased contribution of exotic plants to total plant cover on BTPD colonies relative to off-colony sites. These different results in similar studies exemplify that impacts by prairie dogs on the landscape are highly dependent on species, habitat, climate and age of colony (Fahnestock and Detling 2002). Making clear comparisons between the impacts of BTPDs on mid to short grass prairie, versus those of WTPD and GUPD habitat, is difficult due to the differences in the vegetative communities each species inhabits, as well as to the relatively limited above-ground activity of WTPD and GUPD (they can live more than 5 months underground). In addition, because GUPD and WTPD do not actively clip vegetation to alter their surroundings, their impact on the habitat is probably less. Continued research is needed, however, to adequately address the impact of</p>
<p>Moffat County requests this plan remain DRAFT and that a collaborative and adaptive process be developed to create the Final Plan that includes representatives of Moffat County and other interested stakeholders including the Colorado Cattleman's Association.</p>	<p>CDOW has revised the plan Implementation Process (page 176) that will rank issues and prioritize strategies for implementation based on a stakeholder workshop. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has agreement from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs.</p>

<p>As a “federally mandated plan” what compliance with NEPA was involved with these plans and what consultation with adversely affected interests and or opportunities for public comment and cooperating agency status was afforded to affected local governments in the development of these plans?</p>	<p>This is not a federally mandated plan and is not subject to NEPA requirements.</p>
<p>the details of the plan cause great concern and as currently worded would not create an atmosphere for Ranchers to engage in “civic environmentalism” Which is a concept I too support.</p>	<p>CDOW has revised the plan Implementation Process (page 176) that will rank issues and prioritize strategies for implementation based on a stakeholder workshop. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has agreement from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs.</p>
<p>One meeting dose not make a plan. As one of the invitation only participants I asked for a continued iterative and collaborative process for developing the plan and continue to request such a process. The next version of the plan should remain draft and a stakeholder selected collaborative group should be created to finalize the plan..This is absolutely vital for major stake holder by in. i.e. ranchers</p>	<p>CDOW has revised the plan Implementation Process (page 176) that will rank issues and prioritize strategies for implementation based on a stakeholder workshop. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has agreement from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs.</p>
<p>Gray literature” Question the validity of this data source?</p>	<p>Gray literature is adequate literature to use for a conservation plan. State and federal agencies collect data that is extremely useful for management of species, but that is not published or formally peer reviewed (e.g. lek counts).</p>
<p>If you take such antidotal evidence will you take similar “state in transition "evidence form locally knowledgeable people? Where do I send the evidence form Vermillion ranch and will it be incorporated.</p>	<p>Data used in the plan was the best scientific data available. Local experience and information will be incorporated into the conclusions reached at the local IPA workshops.</p>
<p>It is disingenuous to use Utah prairie dog data to run the PVA. I would support using PVA only when you have locally developed data and only as a questionable guide until it is proven over time to have some accuracy.</p>	<p>Utah Prairie Dogs are the most similar of all prairie dogs to the WTPD. They live in similar habitats, have similar life histories, etc. Experts in the field (Dr. Hoogland, Dean Biggins) who have many years studying WTPD and UTPD biology felt that the demographic data for UTPD could be appropriately used in the PVA.</p>
<p>Recommend adding adaptive management component to plan and not waiting for 10 year cycle for review and adaptation. Refer to appendix A and The MOU</p>	<p>CDOW has revised the plan Implementation Process (page 176) that will rank issues and prioritize strategies for implementation based on a stakeholder workshop. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has agreement from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs.</p>
<p>Agree with Goal of managing for local stake holders needs However plan is wholly inadequate in addressing SEC concerns. If the FRP plan would incorporate SEC then common sense and the Colorado Administrative procedures Act I believe would recommend including SEC considerations now in this plan to give the major stakeholders and the public the cost benefit analysis of each action.</p>	<p>No specific implementation actions are dictated in this document. Individual action plans will be developed at the local IPA level. Soci-economic analyses can be completed if deemed necessary by the local IPA stakeholder group. CDOW has revised the implementation process. See the new Implementation Process Draft#2 (Page 176) that will rank strategies for implementation based on a stakeholder workshop. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has consensus from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs.</p>



<p>I request that a complete SEC analysis be conducted including the impacts to Ranchers economic viability on both private land and federal grazing permits affected by recommendations of this GWPD plan so that ranchers many determine if this is a viable alternative for preventing a listing</p>	<p>No specific implementation actions are dictated in this document. Individual action plans will be developed at the local IPA level. Soci-economic analyses can be completed if deemed necessary by the local IPA stakeholder group. CDOW has revised the implementation process. See the new Implementation Process Draft#2 (Page 176) that will rank strategies for implementation based on a stakeholder workshop. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has consensus from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs.</p>
<p>Authors do not include incentives to encourage civic environmentalism</p>	<p>Incentives are included in the strategies.</p>
<p>Does not adequately contain description of WTPD impact on the land Population Dynamics only says may denude&gt;THEY DO DENUDE AND CAUSE RANGE DEGRDATION If you want civic environmentalism Owe up to the damage and suggest appropriate management levels and strategies to manage degradation</p>	<p>Little research has been completed on the impacts of GUPD and WTPD on their habitats. Most of the research has been completed on BTPDs in response to questions arising as to their competition with cattle; however, the BTPD range is different than either the GUPD or WTPD range and their behavior is different. The following is the literature I found on differences of vegetational communities on and off prairie dog colonies: Grant-Hoffman and Detling (2006) measured vegetation cover, canopy height, species diversity, and nitrogen concentration on and off six GUPD colonies in southwestern Colorado. They found few vegetative differences between prairie dog colonies and non-colonies. Bangert and Slobodchikoff (2000), however, found that the presence of GUPD colonies increased habitat heterogeneity at the landscape level and that this heterogeneity is potentially important to a wide variety of animals. We will add a strategy to investigate the potential impact of GUPD and WTPD on the landscape. Added discussion in Rangeland Condition Section: Questions have arisen as to the role of GUPD and WTPD populations on the spread of invasive weeds across the landscape. GUPD and WTPDs are a disturbance species, and have the ability to activate dormant seed banks through their burrowing activities and consumption of non-native weed seeds that can be dispersed in the fur and feces of the animals. <del>They can also indirectly affect hydrology and nutrient cycling through their burrowing and grazing activities (Whicker and</del></p>
<p>While drought may be an issue, the plan fails to acknowledge the during the same period of reference mid 90's-2007 BLM has conducted required Range health assessments in the plan area with few if any allotments not meeting standards. It ain't range condition folks so get off it! If you want by in by one of the most important stakeholders (ranchers) acknowledge that range condition is NOT the Major ISSUE and what a low priority it is</p>	<p>We describe several factors that impact prairie dog populations, with range condition being an important one. We also state that drought, plague, poisoning, and disease can severely impact populations. We discuss range condition because it directly correlates with prairie dog litter size and survival, which impact population numbers and dynamics. The plan clearly states that historic use of the rangelands has resulted in significant changes in plant species composition and community structure. These changes may impact prairie dogs differently in times of drought, and climate change may increase the frequency of droughts. Uncertainties brought about by these changes must be evaluated and management strategies developed to deal with these uncertainties.</p>

<p>Predictive Modeling unreliable? Unless you can prove it which you haven't here.</p>	<p>The PVA is not intended to provide accurate “answers” for what the future will bring for a given wildlife species or population. This limitation arises simply from two fundamental facts about the natural world: it is inherently unpredictable in its detailed behavior; and we will never fully understand its precise mechanics. Consequently, many researchers have cautioned against the exclusive use of absolute results from a PVA in order to promote specific management actions for threatened populations (e.g., Ludwig 1999; Beissinger and McCullough 2002; Reed et al. 2002; Ellner et al. 2002; Lotts et al. 2004). Instead, the true value of an analysis of this type lies in the assembly and critical analysis of the available information on the species and its ecology, and in the ability to compare the quantitative metrics of population performance that emerge from a suite of simulations, with each simulation representing a specific scenario and its inherent assumptions about the available data and a proposed method of population and/or landscape management. Interpretation of this type of output depends strongly upon our knowledge of prairie dog biology in its habitat, the environmental conditions affecting the species, and possible future changes in these conditions.</p>
<p>There has been no substantive Ag land conversion created in the last 25 years Quit focusing on the past it is irrelevant for today's populations If anything Ag land now has a positive affect which the authors most reluctantly acknowledges. If you want civic environmentalism quit poking us in the eye There is no wide spread poisoning occurring, quit inferring that it is a problem.</p>	<p>Data were presented in the plan documenting little change in Agricultural conversion. Problems associated, both positive and negative, are outlined in the plan</p>
<p>Strike all mandatory like references</p>	<p>There are no mandatory references in the document - CDOW is not a regulatory agency unless it involves take. Thus, a public lands seasonal shooting closure is mandatory.</p>
<p>The draft Plan unnecessarily combines and merges issues of White-tailed and Gunnison's Prairie Dog. Gunnison County respectfully suggests a separate Plan be developed for each species.</p>	<p>We believe that the process of addressing common issues in this conservation plan, with specific actions to conserve populations in local areas, is more practical and efficient, and in light of potential federal action on GUPD and status review of the WTPD due in 2010, more timely than splitting the plan into two separate documents.</p>
<p>The draft Plan is inextricably linked to the United States Fish and Wildlife Service's ongoing process under the Endangered Species Act (“ESA”) regarding the Gunnison's Prairie Dog. Therefore, the draft Plan must be scrupulous in establishing its factual foundations and, then, should only propose conservation measures well founded in fact.</p>	<p>We used the best scientific data available to produce our plan, and we document in the plan where caution should be used in interpreting the results.</p>
<p>The draft Plan, which is intended to be a conservation plan, is subject to being considered a “recovery plan.” That is, Gunnison County has an apprehension that the “conservation” elements in the draft Plan will be transported to regulatory documents, and to grazing and other permits. Gunnison County respectfully suggests that the draft Plan explicitly identify, in its introduction, in its particulars, and in its conclusion, that it is a “conservation” plan and that, if necessary, separate process(es) and publically reviewed document(s) will be necessary to establish a “recovery” plan or regulatory or other permit requirements.</p>	<p>The reference to a recovery plan has been removed. This plan is not a recovery plan.</p>

<p>The Plan is not based on complete, accurate data. The strongest factual conclusion that the Plan can draw is to “suggest” that “GUPD occupied habitat on public lands in Colorado has been reduced.</p>	<p>The data is as complete as can be; we draw conclusions from significant declines that can't be ignored (South Park, Little Snake, etc.) where changes are not an artifact of mapping error or timing in surveys.</p>
<p>The Plan states that “(p)lague epidemic events are a major threat to the future survival of prairie dog populations in Colorado.” (p. 79) A human public health concern flows from this statement. Gunnison’s Prairie Dogs currently are a carrier of plague and, therefore, present a risk to human health; and while “flea dusting practices” may obtain a “relatively modest reduction in the severity of the plague epidemics” (p.79), the Plan does not explore or establish a concurrent diminishment of risk to human health.</p>	<p>Human health issues in relation to plague are beyond the scope of this document and CDOWs responsibilities. However,we added information to describe the potential risk of plague transmissions to humans in the disease section (page 107).</p>
<p>There is no mention of the impacts of wild ungulates (elk, deer, antelope) on the Gunnison’s Prairie Dog anywhere in the Plan. All discussion of grazing impacts is confined to domestic animal grazing. Not acknowledging the possible impacts/interactions of wild ungulates on prairie dogs is not acceptable. At minimum, knowing that there is little information available on these interactions, a strategy to identify and quantify interactions and impacts should be a part of the Plan.</p>	<p>Wild ungulate herbivory existed within the ranges of the GUPD and WTPD prior to the introduction of livestock. BTPD research finds that bison and other large wild herbivores tend to utilize BTPD colonies for grazing and resting far more than predicted (Koford 1958, McHugh 1958, Coppock et al. 1983b, Krueger 1986 in Fahnestock and Detling 2002). Because these species have evolved together, it is unlikely that native grazers and browsers are negatively impacting prairie dog populations.</p>
<p>Throughout the Plan, the Western Association of Fish and Wildlife Agencies (WAFWA) is referenced as giving direction to CDOW or the reason for a planning process, etc. We understand that CDOW’s relationship to WAFWA is important, but WAFWA has virtually no interaction with local entities such as Gunnison County. Gunnison County suggests that CDOW has a responsibility to communicate with local entities before engaging in binding relationships with WAFWA and similar entities that affect us locally.</p>	<p>WAFWA is a cooperative coordination body. As such, CDOW confers with WAFWA, but is not legally bound to perform any actions agreed to via WAFWA processes.</p>
<p>The issue of Wyoming ground squirrels within the Gunnison IPA is not adequately addressed.</p>	<p>We presented the information that was available. If you have additional information we would gladly incorporate it as appropriate.</p>
<p>The “windshield surveys” accomplished by BLM and others should not be considered as more than an indication of presence of the species. The lack of survey protocols makes any information collected little more than “observations”.</p>	<p>The primary utility of windshield surveys is essentially as a coarse filter. As the reviewer correctly states, they indicate presence of a species and little more. To the trained eye, I would argue, they can also indicate relative abundance for prairie dogs. Beyond this, their primary use is as a springboard. For instance, windshield surveys can indicate a rapid disappearance of large numbers of PDs (possibly indicative of plague) which can then be followed up with more rigorous monitoring or biological sample collection. Likewise, the windshield surveys within the Little Snake complex during 2004 and 2005 led to a more thorough investigation of occupied acreage in 2006 using quantitative methods.</p>
<p>CDOW should provide a “final draft” review opportunity to allow everyone to see where and how the Plan was amended after the initial comment period. Further we recommend that after this round of comments are received, CDOW engage local entities such as counties, municipalities and other affected entities such as agricultural organizations to ensure that the Plan accomplishes what it is intended to do without unintended consequences.</p>	<p>A second draft of the document will be available for review, as well as individual strategies.</p>

<p>Overall, the conservation strategies collectively amount to a very expensive endeavor which is unlikely to be accomplished, due to budgetary constraints and the diverse entities required to be involved. Lack of accomplishment of plans such as this one is often cited by petitioners for listing of a species under the ESA as a reason for the need for listing. This was the case in our area with the Gunnison Sage-grouse. The <i>Gunnison Sage-grouse Conservation Plan</i>, which had an extensive listing of “conservation actions”, was cited by petitioners for listing under the ESA, as a reason for the need for listing because so few of the “conservation actions” had been accomplished</p>	<p>CDOW has revised the plan Implementation Process (page 176) that will rank issues and prioritize strategies for implementation based on a stakeholder workshop. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has agreement from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs.</p>
<p>The existing City policies to concentrate growth near urban centers is critical element for the protection of GUPD Habitat</p>	<p>Thank you for your comment.</p>
<p>Relocation offers a viable mitigation policy and is publically acceptable</p>	<p>Please see the population reestablishment section. We are advocating moving prairie dogs in terms of conservation efforts only, and not for rescue efforts. This is because translocations are expensive, time consuming, time dependant and have low success rates. Thus, these efforts need to be well planned out, and we cannot simply be moving prairie dogs each time a potential control effort is planned. In addition, it is not always publically acceptable. It will require developing agreements with private landowners in and around translocated areas.</p>
<p>City is concerned about prairie dogs being considered a carrier of plague. It is critical the city maintains its ability to protect citizens</p>	<p>Five to fifteen cases of plague in humans are reported every year, and one in seven result in mortality due to delays in getting treatment. The most common method of plague transmission to humans is from rats and rat fleas. Plague in prairie dogs has been occurring since before 1941 in Colorado with no incremental increase in human health cases reported as plague has infiltrated the state.</p>
<p>GIS elements of the conservation plan noted that designated habitat area of the GUPD is overestimated. The need for more refined mapping to be completed is critical because inadequate data will affect protection efforts, and would complicate issues if the GUPD is listed</p>	<p>The overall range map for each species was developed with the most accurate spatial data available, and currently we cannot refine the range to be any more accurate.</p>
<p>Incorrect labeling for housing density map</p>	<p>The labeling has been corrected.</p>
<p>Unit densities used in the conservation plan do not reflect true urban densities. The density of residential zoning districts in the city allow between 6 and 30 units per acre. Densities in the draft plan are akin to ranchette and other agricultural uses.</p>	<p>Details of specific areas in an IPA can be dealt with during the Implementation Process. This is a statewide document.</p>
<p>Protecting habitat for species of concern is one element of the annexation process</p>	<p>Thank you for your comment.</p>
<p>Combining 2 species in narrative sections is confusing.</p>	<p>We believe that the process of addressing common issues in this conservation plan, with specific actions to conserve populations in local areas, is more practical and efficient, and in light of potential federal action on GUPD and status review of the WTPD due in 2010, more timely than splitting the plan into two separate documents.</p>

<p>It is probable that conflicts will arise between the protection of the GUSG and the GUPD. It seems logical that conservation actions to protect the local grouse population be given a higher priority. Local ranchers continue to lead efforts in land stewardship and they must be able to maintain their livelihood otherwise agricultural land will be converted to ranchette development.</p>	<p>Local issues within IPAs can be dealt with in developing the local action plans. CDOW has revised the plan Implementation Process (page 176) that will rank issues and prioritize strategies for implementation based on a stakeholder workshop. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has agreement from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs.</p>
<p>It would be helpful to have dates for personal communications throughout the document so the reader can place that particular comment into a historical perspective (exs. Hoogland in <i>Issues</i> section on p50; B. Luce 1<sup>st</sup> paragraph on p.56)</p>	<p>Added dates for Personal Communication</p>
<p>What is the time span that Hoogland's research is expected to cover?</p>	<p>It is dependent on funding</p>
<p>The HSUS disagrees with the fourth conclusion above, given that most shooting occurs during the breeding season. Moreover, shooting of prairie dogs is purely recreational in nature, the goal to kill as many as possible in as short a time as possible, and is the antithesis of the principles of “wise use” and “respect for the resource” that the hunting community would have the public believe is its foundation. Regardless, the Plan fails to adequately address the conclusions of the PVA. For instance, it: 1) does not provide focused management attention on ensuring higher juvenile female survival rates and female reproductive success; 2) fails to adopt as an objective the protection of populations from the full range of anthropogenic stressors; 3) does not specify when, where and under what conditions dusting will take place; 4) does not provide for statewide seasonal closures on shooting; and 5) does <i>nothing</i> to address the extent or frequency of poisoning.</p>	<p>Shooting of prairie dogs is not always for purely recreational purposes. Many landowners, cities and towns need to remove prairie dogs that are causing problems due to their burrowing activities and foraging and many of these individuals may rely on shooting of prairie dogs to reduce populations. Thus shooting can have a viable management role beyond recreation. The PVA is only a tool for investigating current and future risk of Gunnison’s and white-tailed prairie dog population decline or extinction. The need for and consequences of alternative management strategies can be modeled to <b>suggest</b> which practices may be the most effective in managing prairie dog populations. Many researchers have cautioned against the <b>exclusive use</b> of absolute results from a PVA in order to <b>promote specific management</b> actions for threatened populations (e.g., Ludwig 1999; Beissinger and McCullough 2002; Reed et al. 2002; Ellner et al. 2002; Lots et al. 2004). Instead, the true value of an analysis of this type lies in the assembly and critical analysis of the available information on the species and its ecology, and in the ability to compare the quantitative metrics of population performance that emerge from a suite of simulations, with each simulation representing a specific scenario and its inherent assumptions about the available data and a proposed method of population and/or landscape management.</p>
<p>To its credit, the Colorado Division of Wildlife (CDW) addresses numerous steps that are necessary to protect these species, yet fails in the Conservation Plan to move beyond discussion to action. It refers instead to an Implementation Plan that will be created at some undisclosed future date. Given the range of threats identified in the former – urbanization, habitat fragmentation and consequent potential impacts on genetic diversity, poisoning, recreational shooting, livestock grazing, and others – a delay of unknown duration in producing both conservation and implementation plans potentially threatens the viability of many of the populations of these species that will be key to securing a future for the species as a whole. The HSUS strongly encourages the CDW to respond to the issues raised herein and in the comments referenced above, as well as to produce a final plan that is both a conservation and implementation document.</p>	<p>CDOW has revised the plan Implementation Process (page 176) that will rank issues and prioritize strategies for implementation based on a stakeholder workshop. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has agreement from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs.</p>

<p>I understand there are several references to plague as the primary threat to prairie dog survival, but I do not think in the document it elevates this disease above the other threats to the degree necessary. The plague has a major significant kill on prairie dogs of 85-95%; this plan tends to minimize the impact of the disease on prairie dogs and elevates the other impacts. I would suggest a Chapter on the disease and its impact to prairie dog survival, recognizing that this disease is the most important and number one impact on prairie dogs. Another chapter should describe the other issues and their less significant impacts on prairie dogs; those impacts loss of habitat to urbanization, recreation shooting, poisoning effort, drought, oil and gas development, genetics, rangeland condition.</p>	<p>Disease is highlighted as the biggest threat to prairie dog populations. The format of the document follows the WAFWA conservation strategy and so the format will not change. Appendix F will be removed. CDOW has revised the plan development process. See the new Implementation Process in Draft#2 of the document that will rank strategies for implementation based on a stakeholder workshop. These workshops are meetings with local stakeholders in each of the proposed IPAs. The workshop product is a one-page list of prioritized actions that has consensus from the stakeholder group involved. CDOW staff participates to ensure the relevancy of the actions to conservation of prairie dogs.</p>
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Prairie Dogs are a pest and varmint and destructive to rangelands. We are working with the Northwest Weed Partnership to curtail spread on the landscape of noxious weeds. Prairie Dog towns make disturbance which cause noxious weeds, I would like this addressed in the plan.

completed on BTPDs in response to questions arising as to their competition with cattle. The BTPD range, however, is different than either the GUPD or WTPD range and their behavior is different. The following is the literature I found on differences of vegetational communities on and off prairie dog colonies: Grant-Hoffman and Detling (2006) measured vegetation cover, canopy height, species diversity, and nitrogen concentration on and off 6 GUPD colonies in southwestern Colorado. They found few vegetative differences between prairie dog colonies and non-colonies. Bangert and Slobodchikoff (2000), however, found that the presence of GUPD colonies increased habitat heterogeneity at the landscape level and that this heterogeneity is potentially important to a wide variety of animals. We will add a strategy to investigate the potential impact of GUPD and WTPD on the landscape. Added discussion in Rangeland Condition Section: Questions have arisen as to the role of GUPD and WTPD populations on the spread of invasive weeds across the landscape. GUPD and WTPDs are a disturbance species, and have the ability to activate dormant seed banks through their burrowing activities and consumption of non-native weed seeds that can be dispersed in the fur and feces of the animals. They can also indirectly affect hydrology and nutrient cycling through their burrowing and grazing activities (Whicker and Detling 1988 in Fahnestock and Detling 2002); however, the limited amount of research conducted on GUPDs and WTPDs found few vegetative differences between prairie dog colonies and non-colonies in relation to vegetation cover, canopy height, species diversity, and nitrogen concentration (Grant-Hoffman and Detling 2006). BTPDs are the most widely studied prairie dog species and research has shown that their effects on rangeland condition are not uniform, and effects are probably dependent on age of colony, climate, and vegetational community structure (Johnson-Nistler et al. 2004). Activities associated with BTPD colonies can cause a reduction in grass biomass, an increase in bare ground, and an increase in forb biomass (Fahnestock and Detling 2002, Johnson-Nistler et al. 2004). Some studies have found that exotic species of plants become more common at on-colony sites than at off-colony sites (Fahnestock in press). This may indicate that BTPD colonies can be important sites for the establishment of exotic species or as a reservoir for their seeds (Fahnestock in press). Other studies, however, have shown a decreased contribution of exotic plants to total plant cover on BTPD colonies relative to off-colony sites. These different results in similar studies exemplify that impacts by prairie dogs on the landscape are highly dependent on species, habitat, climate and age of colony (Fahnestock and Detling 2002). Making clear comparisons between the impacts of BTPDs on mid to short grass prairie versus those of WTPD and GUPD habitat is difficult, due to the differences in the vegetative communities each species inhabits, as well as to the relatively limited above-ground activity of WTPD and GUPD (they can live more than 5 months underground). In addition, because GUPD and WTPD do not actively clip vegetation to alter their surroundings, their impact on the habitat is probably less. Continued research is needed to adequately address the impact of GUPD and WTPD colonies on the landscape.