

Comments	How comment dealt with
Suggest annual monitoring/mapping might be necessary in areas susceptible to rapid development such as the edges of urban/suburban fringe or near other forms of development.	Additional monitoring techniques were added to the population monitoring section that will allow for site specific monitoring. This plan does not address specific implementation actions. All of these actions are identified as potential management strategies, and will be implemented as appropriate in specific circumstances through the Implementation Process. A new Implementation Process has been developed. This process will be a stakeholder process to rank issues and strategies to be implemented in a 3-5 year action plan. 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.
Need to include commitment of state lands in management of PDs in conservation actions (i.e. 8.1.1.1, pg 178, #3 are on 'state' or public lands, designating MEA, 6.2.1.3 restricting poison, 9.4.21 incentive on state lands, 4.3.1.2 collaborative agreements between pvt, state & public lands, etc.) What proportion of PD habitat is currently occupied on state lands?	A table is available in the plan which includes state land ownership. Added "state" lands to strategies listed in comments.
D. 2nd para, 1st sent, Shouldn't the intensive mgmt w/in MEAs only be applied when low population thresholds or some other trigger occurs? Clarify or add to end of sentence.	Because of the change in the implementation process (see page 176), the MEA section was removed from the Implementation Process section. Development of MEAs was retained as a strategy. During the stakeholder Implementation Process, workshop participants can decide if designating an MEA is desirable and what strategies should be implemented within an MEA.
4.3.1.4, are special management areas the same as MEA? What specifically are they managed for?	Special management areas are not the same as MEAs. Special management areas are defined in the Oil and Gas section and would be managed to minimize the impacts of oil and gas development. MEAs are specific areas defined within an IPA where implementation of strategies can be focused to maintain the prairie dog ecosystem and associated species
4.3.2.2, suggested rewording: 'Minimize impacts to GUPDs & WTPDs from energy and/or mineral development by implementing BMPs that modify pad size, location, pad construction...'	Changed as stated
4.3.2.4, ' .. with native weed-free seed <i>suitable for site potential</i> in GUPD & WTPD habitat.'	Changed as stated
4.3.2.6- suggest deleting the word ' <i>further</i> '- the jury may still be out on existing 'loss' of habitat as a result of energy development in CO.	Changed as stated
4.4.1.1- Confusing statement- Suggest 'Design energy development to maintain large blocks of undisturbed GUPD & WTPD habitat to ensure long term functionality of ecosystem for PDs and associated species.' If I misunderstood intent, reword to make it clearer.	Changed as stated
7.1.1.5, I think what you mean to say is '...to identify responses of populations to management strategies.' Hopefully most of the mgmt strats do not 'impact' the species.	Changed as stated
Since the plan is intended to be a dynamic working document, shouldn't it be updated or at least reviewed more than once in 10 years?	Each IPA workshop will produce an action plan for a 3-5 year period by selecting from strategies available in the document (see page 176).

<p>1.1.1.2 USFS is listed as a proposed responsible party in providing incentives for maintaining populations on private lands. However, USFS does not have incentives programs for prairie dog habitat management on private land.</p>	<p>Parties responsible for implementation will be identified in local IPA action plans. The current ranking of issues per IPA and prioritization of strategies was removed from the document and will be replaced with ranking and prioritization for action plans developed by stakeholders within each IPA.</p>
<p>8.1.1.1 The third criterion should perhaps be reworded to indicate it is desirable to have some public lands included as a core area. However, private lands in some areas may be key for conservation of populations, complexes and genetic exchange in some areas, and it may not be possible to limit restoration efforts to public lands.</p>	<p>This strategy now includes any lands -public or private.</p>
<p>9.4.2.1 You may also wish to consider USFS in addition to BLM under this strategy.</p>	<p>Parties responsible for implementation will identified in local IPA action plans. The current ranking and list was removed from the plan. The current ranking of issues per IPA and prioritization of strategies was removed from the document and will be replaced with ranking and prioritization for action plans developed by stakeholders within each IPA.</p>
<p>The plan envisions the issuance of annual reports on the implementation of the plan each year and a final report 10 years out. The plan should specify who is responsible for these reports. We assume the Implementation Team, but the plan should be specific about the ultimate entity accountable – we assume CDOW, but the plan must be specific.</p>	<p>CDOW will be responsible for reports unless another entity is identified through the Implementation Process and development of local action plans.</p>
<p>In the second full paragraph, second line, the plan describes tables as starting on p. 67 – this should be 167.</p>	<p>This section of tables was removed from the plan</p>
<p>The plan recommends identification of management emphasis areas within IPAs, with a minimum of one MEA in each IPA. The plan further states that the most important management issues within each MEA should be identified. It seems that these areas and management issues should have already been identified. Again, we are concerned that this is a plan for a plan</p>	<p>Because of the change in the implementation approach with the public, the MEA section was removed from the Implementation Process. Development of MEAs was retained as a strategy. During the stakeholder Implementation Process, the IPA stakeholders can decide if they want to designate an MEA and what strategies they deem appropriate to implement, based on the issue ranking.</p>
<p>We are also troubled by this statement: “Implementation of strategies within each MEA should be designed so as to not interfere with multiple-use management.” Does this apply equally on private and public land? This would seem to potentially greatly undermine viability of conservation strategy in a given MEA if “multiple-use” includes oil and gas drilling, for instance. It looks like business as usual, rather than real prairie dog conservation.</p>	<p>CDOW changed the wording in Strategy 2.1.1.1. from “so as to not interfere with multiple-use management” with “to balance the long-term conservation needs of prairie dogs and associated species with other uses that may occur on the landscape”</p>

<p>Before we turn to individual lists of prioritized strategies, we recognize that much time and effort went into a scoring system (outlined in Appendix F) to decide which strategies delineated in the plan at Section V (Issues and Conservation Strategies) warrant prioritization, as spelled out in Section VI (Implementation Process). However, we think that the plan’s authors need to step back and consider the results of that scoring and make adjustments so that this plan significantly furthers conservation. For instance, as we discuss below, the objective prioritized for agriculture: “Minimize the negative effects of prairie dogs on agricultural lands” does not promote prairie dog conservation, while the objective omitted would have (at least in name): “Minimize the adverse impacts on GUPDs and WTPDs of habitat fragmentation caused by current agricultural practices.” With this type of result, the resulting plan will be hard to call a conservation plan. We therefore recommend changes – and we also express our agreement for portions – within the list of prioritized strategies outlined in Section VI.</p>	<p>A new Implementation Process has been developed in Draft#2 of the document (see page 176). This process will be a stakeholder process to rank issues (current ranking will be removed) and strategies to be implemented in a 3-5 year action plan. 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>There is no reference to cooperating with willing landowners to monitor prairie dog populations. We request this be added to the Plan.</p>	<p>Included private landowners</p>
<p>Moffat County requests adding a conservation strategy of coordinating with private landowners and encouraging voluntary partnerships with landowners to address disease. This new strategy and associated objective should be incorporated into the new Chapter 1. Disease.</p>	<p>New strategy added (page 113 strategy 3.3.1.12.).</p>
<p>We appreciate the approach of using incentives for private landowners to maintain prairie dog populations. We also request the Plan address the point that although this plan focuses on prairie dogs, it is not the intent to pedestal the priority of prairie dog management over that of existing land uses. Rather prairie dogs must coexist with other land uses and not be singled out as a higher use.</p>	<p>This document does not address specific implementation actions. All of these actions are identified as potential management strategies, and will be implemented as appropriate in specific circumstances through the Implementation Process at the local population area level. CDOW cannot regulate mangement on public or private lands we can only develop strategies to try and address issues impacting GUPD and WTPDs. As part of a direction to do multiple species management we cannot <u>solely conserve GUPD at the detriment of other activities</u>.</p>
<p>1st Paragraph and A. not sure if IT team best approach not local enough Any group developed must have substantive ability to consult on CDOW funding priorities. At the very least If you use “Implementation team” it must include representatives appointed by the grazing industry</p>	<p>A new Implementation Process has been developed in Draft#2 of the document (page 176). This process will be a stakeholder process to rank issues (current ranking was removed) and strategies to be implemented in a 3-5 year action plan. 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 <u>the actions to conservation of prairie dogs</u>.</p>
<p>Confusing to understand all of it Consolidate in one place (no appendix F)</p>	<p>Appendix F was removed from the plan - please see new implementation process (page 176)</p>
<p>The Idea of focusing on federal lands and mandatory approaches because of “ease” ignores landscape issues and will cause ill will. Use holistic approach with emphasis on incentives that recognize you get more with honey than sticks Object to any MEA designation that pedestals PD over other uses and provides for only “input” from affected stakeholders I request that ranchers be given the same seat as agency biologists in creating MEA. Creating an MEA will not adversely affect the other multiple uses with the MEA MEA’s should only be used to facilitate cooperation consultation and coordination among stakeholders</p>	<p>Designation of MEAs is a strategy that may or may not be selected for implementation in a given IPA. A new Implementation Process has been developed. This process will be a stakeholder process to rank issues (current ranking will be removed) and strategies to be implemented in a 3-5 year action plan. 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>The Implementation Team membership does not include County and other local governmental entities. Though Gunnison County understands that a large group is cumbersome, Gunnison County does not feel comfortable not being represented, because of the significant impacts management actions for prairie dogs may have on County residents. Gunnison County wishes to have a representative on the Implementation Team. Gunnison County also recommends that CDOW solicit other counties and local governments for members as well.</p>	<p>There will not be a rangewide implementation team. A new Implementation Process has been developed in Draft#2 of the document. This process will be a stakeholder process to rank issues (current ranking will be removed) and strategies to be implemented in a 3-5 year action plan. 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>Management Emphasis Areas (MEA) are of concern to Gunnison County, primarily because of their possible implications to County residents. Gunnison County requests that it be involved at all phases of identification of MEA's, as well as further actions that may take place within the MEA's.</p>	<p>MEAs are an optional strategy and, if selected for implementation, local stakeholders can decide where to designate the MEA following criteria in the plan.</p>
<p>Strategy 7.1.2.5. "Update gross level activity Mapping at least every 3 years", concerns Gunnison County. The agency field personnel interviewed and apparently that will continue to be interviewed have little or no access to private lands. Gunnison County does not believe that even at the "gross level..." this provides any substantive information on prairie dog activity and is likely to provide out-of-context mis-information. Gunnison County recommends that CDOW revise this Strategy to include private landowner contact in a meaningful manner. Precedent for severely underestimating populations without considering private lands has already been set with the Black-tailed Prairie dog.</p>	<p>Cooperation with counties and landowner groups is welcome, and will undoubtedly help to develop better information. We believe that the occupancy sampling approach that we have implemented will be sufficient to accurately determine statewide trends important to conservation of both species, and this technique, based on randomly selected sites, includes private lands. We are not estimating populations (number of individuals) and we do not believe that such an estimate is either necessary or financially prudent.</p>
<p>Issue 2.4. Is it possible that Wyoming ground squirrels are resistant or immune carriers of the plague or plague vectors?</p>	<p>This is addressed in the plan.</p>
<p>Objective 2.4.2.2. Dusting with an insecticide is likely to impact other insects, including those beneficial to Gunnison Sage-grouse. We do not recommend this action without considerable research and evaluation of overall impacts to all species, not just prairie dogs.</p>	<p>A discussion of dusting impacts to arthropods was added to the document. During the Implementation Process, strategy implementation can be discussed and agreed upon.</p>
<p>Though Wyoming ground squirrels are identified as having a possible competitive advantage over prairie dogs, nothing other than monitoring is listed as a strategy to deal with the possible negative interactions. Gunnison County questions why?</p>	<p>Until a better understanding of the relationship of WYGS to GUPD populations is developed, no other actions are defensible.</p>
<p>Issue 3.1. Plague is identified conclusively as the greatest single threat to GUPD and WTPD's. Gunnison County believes this statement has yet to be conclusively proven. Gunnison County also notes that other rodent species (such as marmots) periodically disappear from an area. This may indicate plague or other lethal diseases impact other rodents which may interact with the prairie dog at some level.</p>	<p>All of the data on prairie dog biology and susceptibility to plague has demonstrated that plague is the biggest threat to prairie dog populations. There are many examples in Colorado where plague has had a devastating impact (e.g. South Park, Curecanti, Little Snake). Many other species can die from plague or can be carriers of the disease. However, prairie dogs are extremely susceptible to the disease and can experience 100% mortality in a colony. We do not understand how plague is maintained in the system and when epizootics occur. Please see the plan where these items are addressed (page 102)</p>

<p>Issue 5.1. The statement “...resulted in smaller colonies than were <u>thought</u> to occur historically” concerns Gunnison County. It may lead to management actions, particularly on public lands, to try to achieve goals that Gunnison County isn’t sure ever existed or even that can exist.</p>	<p>There are areas in Gunnison County where prairie dogs once occurred, but are currently absent (Curecanti, Cochetopa Park). There are also areas that have evidence of old, unoccupied burrows that have been vacant for a number of years. In addition, WYGS now occupy areas that were once inhabited by GUPD. From historical mapping, it is apparent we have lost areas of occupation, and current data show that prairie dog colonies are smaller and more widely distributed. Our main focus in the plan is to restore areas of prairie dogs that we knew existed at one time in order to allow prairie dog populations to fulfill their ecological function.</p>
<p>Objective 7.1.1.2. The “rangewide trigger” referenced in this objective was developed by WAFWA. Because of the possible impacts of defining trigger points for species populations on local entities such as Gunnison County, the County would like more information on the scientific basis for this “trigger.”</p>	<p>The trigger was based on baseline occupancy surveys from Colorado. A power analysis was completed to develop a level of decline that we could detect with 90 to 95% confidence level. Between two surveys, a 40% decline was detectable with acceptable precision. The WAFWA working group felt that since we are conducting a range-wide survey a 40% decline would be substantial and would trigger rangewide conservation actions. We do not have a state-wide trigger.</p>
<p>Issue 8.1. For population reestablishment. There is no mention of the Colorado Department of Agriculture or the public in the strategies for population reestablishment. Private landowners are identified as a “responsible party”, when in-fact, Gunnison County believes they are critical stakeholders.</p>	<p>A new Implementation Process has been developed in Draft#2 of the document (page 176). This process will be a stakeholder process to rank issues (current ranking will be removed) and strategies to be implemented in a 3-5 year action plan. 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. Responsible parties will be identified during this meeting.</p>
<p>Rangeland Condition Conservation Strategy 9.3.1.3. indicates that constructive, organized dialogue among stakeholders be encouraged and “continue”. Other than one 3-day meeting, Gunnison County is unaware of any efforts to encourage or “continue” dialogue with stakeholders. At minimum Gunnison County believes that statements made by the CDOW in this Plan be accurate and truthful. Gunnison County strongly supports more training for all resource professionals in the use of TR 1734-6 <i>Interpreting Indicators of Rangeland Health</i>, including CDOW staff. If there is one area that people managing or evaluating rangelands lack understanding about is what is good rangeland health and how does it relate to the soils that the <u>vegetation resides</u></p>	<p>Additional conservation planning meetings will be held to develop conservation plans for each individual population area. Stakeholders in the Gunnison IPA were the first to convene and discuss conservation practices and strategies for implementing a local conservation plan.</p>
<p>Issue 9.4. Gunnison County would like more information on the basis for the statement “There is concern regarding competition for forage between prairie dogs and ungulates.” Gunnison County recommends rewording this to: “There is a lack of understanding of the competition for forage between prairie dogs and ungulates”. Statements such as the current one in the Plan, taken out of context, become the basis for land management decisions that negatively effect constituents of Gunnison County and other areas.</p>	<p>Changed as stated</p>

<p>The grazing conservation strategies need to be reviewed and revised. A number of them may be used negatively by land management agencies. Gunnison County is concerned about the scientific basis for identifying grazing management practices that impact prairie dogs as well as how BMP's are developed.</p>	<p>Strategies were developed at the three day workshop by stakeholders. A new Implementation Process has been developed in Draft#2 of the document (page 176). This process will be a stakeholder process to rank issues (current ranking will be removed) and strategies to be implemented in a 3-5 year action plan. 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. Responsible parties will be identified during this meeting.</p>
<p>Conservation Strategy 11.2.1.3. Gunnison County does not believe that prairie dogs are truly "important" to the urban ecosystem.</p>	<p>Maintaining the distribution of prairie dogs range-wide is important. Strategies were developed by stakeholders.</p>
<p>We generally agree with your assessments of Issue Ranking. Plague is definitely the most significant threat for both prairie dog species, so we strongly support your efforts to manage this threat, and are willing to provide assistance in your efforts. Population monitoring is also a high ranking issue that needs to be addressed so that the influences of the various factors affecting the species can be appropriately managed. Monitoring efforts should also include the levels of activities (urbanization, oil and gas development, shooting, etc) such that at least correlations or inferences about potential causal relationships can start to be monitored. In Table 20 the scope of urban development should be increased to medium since it is adversely affecting half the populations statewide (this would be based on at least GUPD South Park and Southwest IPAs be ranked as medium, therefore at least 5 of 9 IPAs have medium or higher ranking).</p>	<p>A new Implementation Process has been developed in Draft#2 of the document (page 176). This process will be a stakeholder process to rank issues (current ranking will be removed) and strategies to be implemented in a 3-5 year action plan. 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. Responsible parties will be identified during this meeting.</p>
<p>Replace "so as to not interfere with multiple-use management" with "to balance the long-term conservation needs of prairie dogs and associated species with other uses that may occur on the landscape". It would be premature to state that no impacts (not interfere) with multiple-use management would occur in the designation of MEAs.</p>	<p>Changed wording as stated.</p>
<p>Strategy 7.1.1.2. Using only the rangewide trigger established by WAFWA as the basis for changes in sampling frequency is inappropriate. The trigger should be used in conjunction with the more site-specific and intensive monitoring that we believe should be conducted at more than 1 site for each of the species (as discussed above).</p>	<p>A new Implementation Process has been developed in Draft#2 of the document (page 176). This process will be a stakeholder process to rank issues (current ranking will be removed) and strategies to be implemented in a 3-5 year action plan. 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. Responsible parties will be identified during this meeting.</p>

Strategy 7.1.1.3. We strongly support this strategy and for the reasons mentioned, but due to the limited nature of existing BFF areas more intensive monitoring is needed in WTPD habitat to obtain representative data from other portions of the species habitat within Colorado.

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Strategy 7.1.2.5 While mapping colony location and activity, other activities (those known or suspected of impacting PDs, presence of plague,etc) that are occurring on the landscape should also be documented so that potential influences on colony activity can be analyzed to determine if additional management may be needed.

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Objective 2.2.1.1. Information on habitat conditions should also be collected at these sites to learn more about prairie dog responses to varying habitat conditions.

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Objective 3.1.1.1, add “and its impact at enzootic (as compared to epizootic) levels.

No change is needed. We are not comparing epizootic to enzootic, but evaluating whether plague is present in the system at low levels between epizootics and what impact that low level will have on populations.

Objective 3.3.1.1-3. We would appreciate being added as a proposed responsible party.

No implementation team is going to be organized. A new Implementation Process has been developed in Draft#2 of the document (page 176). This process will be a stakeholder process to rank issues (current ranking will be removed) and strategies to be implemented in a 3-5 year action plan. 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. Responsible parties will be identified during this meeting.

Chart on page 164 is misleading and needs to be redone. Very high should be disease that is how it is listed it should be above all the rest of the issues. I am speaking for Northwest Colorado. Energy and Mineral Development should be low-medium. Population Monitoring should be high, rangeland condition should be low-medium. It is misleading to rank disease the same as energy and mineral development, and rangeland condition.

The chart will be removed. A new Implementation Process has been developed in Draft#2 of the document (page 176). This process will be a stakeholder process to rank issues (current ranking will be removed) and strategies to be implemented in a 3-5 year action plan. 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. Responsible parties will be identified during this meeting.