

Comments	How comment was dealt with
<p>The Plan states: "Therefore, like the grassland species conservation plan (Colorado Division of Wildlife 2003), the focus of this plan is not only to promote conservation of GUPDs and WTPDs, but also to incorporate the needs of associated wildlife species." However, the Plan is nearly silent concerning conservation measures that are applicable to, or were added to the plan, in order to address other species including the ferruginous hawk and burrowing owl.</p>	<p>This document is a WTPD and GUPD conservation strategy, and is not designed to be a conservation plan for associated species. The focus of this plan is to promote conservation of GUPDs and WTPDs, and by appropriately managing the prairie dog ecosystem, we are hoping we will be addressing the conservation needs of associated wildlife species. Removed the wording "therefore" (page 3) because we are not writing a plan for associated species.</p>
<p>Under C. Goals of the Plan: "Develop and implement conservation strategies that will work to prevent the need to list GUPDs and WTPDs under the ESA." However, Colorado through co-authorship of the Working Group "Conservation Assessments" (Page 2) already determined that "listing of the GUPD and WTPD under the ESA was not justified." It is unclear how this plan supplements or builds upon existing conservation actions. Suggest that this be clarified.</p>	<p>Though Colorado agreed with the WAFWA GUPD/WTPD working group that the GUPD and WTPD did not need to be listed at this time, we were all in agreement that issues such as plague are impacting the species, and state agencies need to develop state specific plans to address issues and maintain viable populations into the foreseeable future. CDOW is very committed to prairie dog conservation and if we are successful in doing our job, then the species should not need to be protected under the ESA. CDOW would like to be proactive in our conservation efforts and not wait until a species needs to be listed to try and promote conservation. It is much easier to work on improving species viability before they get to the level of needing listing. Thus this plan supplements already occurring conservation actions.</p>
<p>The Plan states: "Managing for sustainable local economies is a conservation approach that guides this plan because its authors and signatories believe that sustainable local economies are essential to successful conservation of GUPDs and WTPDs." There should be a clearer link to this statement and the subsequent analyses. It's not clear in the plan how this plan is being guided by local economies.</p>	<p>Economic issues will be addressed when local action plans are developed. CDOW realizes that without stakeholder buy off on this plan, implementation will not be successful. Stakeholders must understand the purpose of the plan is not to impose controls and regulations on their agricultural, economic, and recreational activities. CDOW's only regulatory authority for species conservation is by protecting it from pursuit, capture and harvest and by promoting conservation efforts. The development of this plan is working toward a preventive conservation plan, aimed at avoiding the full implications and requirements of a recovery plan. Our goal in this planning process is to identify voluntary steps we can take now to avoid top-down regulatory action and land use restrictions. In fact, we will only need to consider those kinds of strict regulations and controls if this plan fails.</p>
<p>The purpose reveals that the conservation plan will only contain potential strategies for later implementation – this plan is not an actual plan for what to do.</p>	<p>Action plans for on the ground implementation will be developed during a public meeting process. Please see new Implementation Process (page 176) laid out in Draft #2 of the document.</p>
<p>The discussion of the negative 90-day petition findings leaves out all mention of interference by political appointee Julie MacDonald. CDOW must disclose this part of the story. The plan claims that FWS spent two years reviewing each petition and then arrived at negative findings, which would lead an uninformed reader to conclude that the Service originally denied protections after careful consideration, and is only now considering protection because of new lawsuits requiring the agency to do so. In actuality, we submitted the white-tailed petition in July of 2002. The Service did not make a finding on our petition, so we were forced to sue. The Service did not settle that lawsuit until March of 2004, and announced their negative finding 8 months later. Documents obtained under the Freedom of Information Act showed that the Service made positive 90-day findings for both species, but Julie MacDonald illegally ordered that both findings be changed to negative. The Service has admitted to this illegal interference: see, for example, the June 21, 2007 memo from the Region 6 Director to the Director of the Service – regarding the white-tailed prairie dog 90-day finding, the Regional Director wrote, "The change to not substantial</p>	<p>Discussion inserted as stated into document</p>

The statement that “Only a genus gets a priority of 1” should be reworded to say “only a monotypic genus” (in other words, a genus containing only a single species).	Inserted as stated
CDOW needs to disclose interference in the white-tailed finding as well.	Discussion inserted as stated
“Management of GUPDs and WTPDs was undertaken” – please describe.	Sentence was removed for clarification
The plan claims that all states within the range were instituting shooting closures, but this is not the case. Wyoming has made no attempt at a shooting closure, for example.	Changed to state that Wyoming is not instituting a shooting closure.
Does WAFWA plan to issue a white-tailed prairie dog plan? If so, how will CDOW ensure that Colorado’s state plan conforms with it?	The WTPD addendum has not been completed. A statement was added to acknowledge this. Our state plan is conforming with the GUPD addendum, and the WTPD addendum draft is similar to the GUPD, so we feel confident that we will conform to the WTPD plan as well.
NGOs should be listed among the entities involved in the development of this plan.	NGO was added
Oil and gas drilling should be included in the list of factors that may have caused declines.	Oil and Gas was added
The mountain plover (state species of concern) should be included in the list of associated species.	Added Mountain Plover
The first goal focuses on preventing the need for Endangered Species Act protection. Instead CDOW should focus on recovering these species or ensuring their long-term viability.	Goal reworded: Develop and implement conservation strategies designed to maintain viable GUPD and WTPD populations range-wide in Colorado to prevent the need to list them under the ESA.
The third goal is not achieved: “Implement conservation strategies to help mitigate negative impacts to GUPD and WTPD populations.”	Goal was removed
CDOW is directed to “preserve protect and enhance wildlife species that may be at risk of becoming threatened or endangered”. However, the states have proposed tying prairie dog management to the results of occupancy modeling, and only implementing conservation measures after a species has undergone a 40% decline in occupancy range wide over a three-year period. That is managing for a declining trend, not managing to enhance populations. Occupancy modeling smooths out much of the variability in prairie dog population dynamics because it considers only presence and absence, and does so only on a range wide (or, for Colorado’s data collection, statewide) scale. Thus major declines that do not occur across the entirety of the range, or do not result in the complete extirpation of a site, may not be registered via occupancy modeling. This makes it all the more likely that a detected 40% decline in presence range wide over a three-year interval would signal a catastrophic event, and the states’ attempts to implement conservation measures in response would probably be too little too late.	The 40% trigger was based on the first CO surveys of an occupancy rate of 7.5%. A 40% decline was the only decline we could detect with acceptable levels of precision. We will revisit triggers as we determine process variation. The point of the range-wide survey is to smooth out the variance. Currently, at sites where we monitor active/inactive burrows, the Coefficient of Variation is so high that we have no ability to determine trends with any acceptable precision level. Thus at site specific scales, we cannot identify a trigger for action since GUPD and WTPD populations can fluctuate dramatically (as stated in plan) from year-to-year. Because we are using a range-wide approach, we can detect colonization and extinction rates across the landscape through time. Because we see prairie dogs exhibiting such dynamic cycles, this is the only way to assess the range-wide health of the species. We have not defined a state-level trigger for action because we want 3 surveys completed to assess process variation. We are going to continue to manage and conserve prairie dogs regardless of the trigger.
The management plan is organized around “a strategy that was predicted to reduce the risk by the greatest amount, and typically does so with the least amount of financial and/or sociological burden”. However, preventing the extinction of both species should be the bottom line	Strategy and issue prioritization will be completed at the IPA level. A ranking process will be implemented so that strategies can be prioritized in a consistent and reproducible manner statewide. Please see the new Implementation Process (page 176) in Draft #2 of the document.
The 10-year time period over which this plan will be in effect should be revised since it was not adopted in 2008.	Action plans will be developed for 3-5 years and reevaluated annually to determine how to proceed with conservation efforts. Please see the new section on the Implementation Process (page 176) in Draft #2 of the document

<p>We have concerns about using occupancy modeling to gauge the effectiveness of management changes. This method cannot detect changes in prairie dog density, presence of associated species, or impacts on prairie dog demography. All occupancy monitoring reflects is presence or absence. Prairie dogs may still be present long after the prairie dog ecosystem ceases to exist – prairie dogs at low densities may no longer fulfill their ecosystem roles. Occupancy modeling must at least be supplemented with more sensitive monitoring at selected sites throughout the range of both species.</p>	<p>Occupancy is evaluating state wide and range-wide population trends of prairie dogs. We will conduct site specific monitoring for those projects that are implemented. These projects will be determined within each IPA through a public involvement process (see Implementation Process (page 176) in Draft #2 of document).</p>
<p>The items on page 4, part C, are more objectives not goals. The goal of writing the plan is not to implement the plan; it is to protect and recover PD. The plan should set out clear and definable PD goals, such as how many active PD colonies, populations, numbers, acres, etc., are needed to ensure the population is stable and secure enough so it doesn't have to be listed. The plan should include all the information on the existing active colonies to form a base that gives you a starting point and where you need and/or want to go. Without clear definable population goals how can it be determined if the plan was successful?</p>	<p>This is not intended to be a recovery plan; it is a conservation strategy to assess the species status and outline strategies that can be implemented to conserve the species. An action plan will be developed for each IPA with public involvement. During the development of the action plan, the group will need to determine how they will evaluate the success of their action plan. Mapping may be used as a measure of success at a site-specific scale, but at a range-wide scale mapping is not a feasible way to evaluate populations trends. We discuss the limitations of several monitoring techniques in draft#2 of the document. We are using occupancy as the response variable for our statewide and range-wide efforts since it is an objective, repeatable technique.</p>
<p>Regarding WTPD populations, it appears to fluctuate by more than 50% between consecutive years (pg 11). It is important that population estimates are based on long term, multiple year estimates.</p>	<p>We are conducting site specific surveys using active/inactive burrows as an index to the population in Wolf Creek and Coyote Basin. These surveys show that the WTPD populations fluctuate dramatically. The coefficient of variation in our annual estimates is too high to provide acceptable precision in trend estimates. One reason we are using occupancy sampling statewide, is to lower process variation so that we could conduct a trend analysis with an acceptable level of precision.</p>
<p>Plan states that the Plan duration is 10 years. This is too long of a duration for review, when throughout the Plan the CDOW states how little is known about the GUPD. We expect, much like the black-tailed PD, that we will gain more and better population data, better mapping, and information on the conservation strategies each year. We suggest that the plan is updated by CDOW and local stakeholders, two years after signature, and every 3-5 years thereafter.</p>	<p>Action plans will be developed for a 3-5 year period and will be evaluated annually to determine how to proceed with conservation efforts. Please see the new section on the Implementation Process in Draft #2 of the document (page 176).</p>
<p>Plan states the Plan may be used as the basis for the Recovery Plan if the GUPD is listed. From our long and involved process with the Gunnison Sage-grouse, we believe that a Recovery Plan would need to be done by individual species (not 2 species combined as currently in this Plan), with much more public involvement than this plan, and with more recent population and habitat need information. We believe that a Recovery Plan would need to be its own process.</p>	<p>This statement merely indicates that the information included in the document could be used during development of a federal recovery plan for either species. We agree that a separate process would be needed for a federal recovery plan; thus, this paragraph was removed. This is a conservation strategy and not a recovery plan.</p>
<p>It should be noted in this section that Colorado did not sign onto the 11-state BTPD Plan due to the concern that Colorado's efforts and populations would be aggregated and not considered independently. While CCA is very supportive of a cooperative effort that will capitalize on expertise, information and methodologies, we would be concerned about any aggregation of information or range-wide standards that are not specific to Colorado, being implemented in Colorado.</p>	<p>Colorado is participating in occupancy sampling range wide in cooperation with the other GUPD/WTPD states. We have also agreed to complete state specific conservation plans for the 2 species (i.e. this document) however, the strategies in this document and the action plans to be developed are specific to Colorado.</p>

<p>It is noted in this section, the Conservation Assessment suggests range-wide decline in populations and habitat but goes onto to say, for a variety of reasons, that these population and habitat declines were not quantified. CCA finds the use of theorization as a basis for determining future management and regulatory approaches unacceptable and believes the conservation assessment should only be used for determining future requisites that must be in place previous to determining populations or habitat amounts for either species.</p>	<p>Large areas of prairie dog occupied acreage have been lost in Colorado, (e.g. South Park, Peach valley, Gunnison Basin, Little Snake). We have based our assessments on these obvious declines without new colonization. Smaller, less obvious declines cannot be quantified largely due to issues identified with mapping efforts. In addition to identifiable declines we know that plague is an impending threat to GUPD and WTPD. This is an issue where we have limited ability to predict epizootics or outcomes from epizootics. We also have few management options to deal with this disease. Because of the immediacy of this threat and the obvious loss of population areas, conservation measures are being recommended. CDOW is not able to institute regulatory approaches, but if these species get listed under the ESA, than we will be facing regulations. Thus CDOW is trying to be proactive in our management. Individual action plans will be developed with stakeholders to implement appropriate strategies from this plan.</p>
<p>CCA believes that a more inclusive approach in the Plan's development should have been implemented. Specifically, CCA requests the opportunity to comment on and/or be included in each phase of the Plan's drafting from this point forward.</p>	<p>This opportunity will be provided to all stakeholders. Implementation processes will provide action plans for a 3-5 year period (see new Implementation Process in Draft #2 of the document page 176) . The development of these action plans will be through a public stakeholder process. Participation in the planning workshop will be open to anyone with an interest in the management of prairie dogs in the defined project area: local communities, landowners, conservationists, state, federal and local agencies, and any other interested individuals or organizations. The action plan will be developed through a local workshop using a collaborative, facilitated discussion and ranking process.</p>
<p>CCA requests that the Plan be an adaptive document as to meet the changing conditions and information that the Plan references. By doing so, CCA believes the life span of the Plan can be removed and ongoing review and adaptations will take place. Regardless of these points, the Plan must be based on relevant science that is current and not speculation or untenable.</p>	<p>The implementation process will provide an action plan for a 3-5 year period. Action plans will be updated and changed as needed. Action plans will be developed for a 3-5 year period and reevaluated annually to determine how to proceed with conservation efforts. Please see the new section on the Implementation Process in Draft #2 of the document (page 176).</p>
<p>Under occupancy modeling, does the referenced model allow for inclusion of quantifiable information and consider that information more relevant? It is desirable, and likely, that quantifiable information will be collected as part of the adaptive approach of the Plan. This being considered, there will be a point where actual knowledge will outweigh modeled approximations. What is the review process for this scenario and will the modeled approach be discontinued in lieu of quantifiable information?</p>	<p>Occupancy modeling is an actual on the ground survey technique. Modeling refers to extrapolation of the results to the entire range. We are examining presence/absence at designated plots within the overall range of the species. Plots are located on both private and public lands. We survey the same plots through time to determine extinction and colonization of plots. If extinction rates are greater than colonization, there is a downward trend in the state-wide population occupancy; conversely, if colonization rates exceed extinction rates, the trend is upward. We are using occupancy to track trends instead of mapping, because occupancy is an estimation technique that is objective and repeatable. CDOW has investigated the use of other techniques: aerial surveys, digital mapping and satellite imagery surveys, but none of those techniques could adequately identify burrows on the landscape. Occupancy gives us a repeatable, objective measure to follow trends and provides a precision level that can be used to evaluate declines and increases in occupancy rates.</p>

<p>CCA appreciates the reference in this section to managing a federal recovery Plan in recognition of social and economic considerations. CCA requests that the language “to the maximum extent possible” be replaced with “at all costs”. This section references the term holistic. The holistic approach does not infer consideration of all factors up to a point but rather complete consideration of whole systems all of the time. CCA encourages a true holistic approach that will ultimately yield preservation of a species and the socio-economic aspects of the species’ habitat area. To accomplish this, it is likely and supported by CCA, that a socio-economic analysis be conducted previous to any regulatory action.</p>	<p>This section was removed because this document is not a Recovery Plan but a Conservation Strategy to help guide local action plans for on the ground implementation of conservation strategies. This is not a regulatory document and a socio-economic analysis could be completed before any regulatory actions were considered. The new Implementation Process will allow stakeholder input as to what strategies will be implemented and what impact they may have on the local economy and environment. Action plans will be developed for a 3-5 year period and reevaluated annually to determine how to proceed with conservation efforts. Please see the new section on the Implementation Process in Draft #2 of the document (page 176).</p>
<p>We find it misleading for the Plan to suggest a <i>range wide decline in population...</i> for White-tailed Prairie Dogs (WTPD) when the very next sentence states that <i>population and habitat declines were not quantified due to 1) incomplete and inconsistent surveys; 2) variable time periods between estimates at specific sites; 3) lack of completed exhaustive mapping surveys; and 4) lack of objective, standardized monitoring techniques to evaluate long-term population trends</i>. We request rather than identifying <i>range wide declines</i>, that the Colorado Division of Wildlife (CDOW) acknowledge they do not know if there is a decline or not.</p>	<p>Large areas of prairie dog occupied acreage have been lost in Colorado, e.g South Park and Little Snake. We have based our assessments on these obvious declines without new colonization. Smaller, less obvious declines cannot be quantified due to issues identified with mapping efforts. Until variation between mapping efforts can be described and compensated for, mapping can only provide a gross approximation of dog occupied acres. These gross approximations, however, are meaningful in areas that have experienced significant declines or increases. In areas where changes have been less extreme, mapping cannot produce comparable results.</p>
<p>We request an economic assessment describing the economic impacts of the White Tailed Prairie Dog Plan on Moffat County. Economic costs for disease vaccines and other management efforts should be readily available to include in this plan</p>	<p>As specific implementation is not directed by this plan, an economic analysis is probably not needed at this time. This is not a Recovery Plan or a regulatory document, but a Conservation Strategy to help guide local action plans for on the ground implementation of conservation strategies. The new Implementation Process will allow stakeholder input as to what strategies will be completed and what impact they may have on the local environment (see Implementation Process in Draft #2 page 176).</p>
<p>Section D. <u>Management and Legal Authorities</u> does not address or acknowledge other State or local policies or laws that may conflict with provisions within this Plan. The Colorado Department of Agriculture has regulations regarding prairie dogs as do a number of municipalities, such as the City of Gunnison. Some of these define prairie dogs as “pests” or similar and require their control under penalty of law.</p>	<p>This section was written to discuss CDOWs management and legal authorities since this is a CDOW document. We do recognize that we will have to work with other agencies and their authorities to implement conservation strategies.</p>
<p>Though the Plan states that involving stakeholders in conservation management ... is one of CDOW’s management principles, only one meeting was held, at least for Gunnison’s Prairie Dog during the development of the entire Plan. Though considerable work has now gone into the Plan, Gunnison County believes that CDOW has a responsibility to further involve stakeholders before this Plan is finalized.</p>	<p>The Implementation Process will allow stakeholder input as to what strategies will be completed and what impact they may have on the local economy and environment (see Implementation Process in Draft #2 of document page 176).</p>
<p>Ten years before the Plan will be reviewed is too long. This Plan potentially affects a large number of citizens in Colorado. Review of the Plan should occur, for both the good of the species and the affected stakeholders, at a more frequent interval. Gunnison County suggests an initial review after two years and thereafter every five years.</p>	<p>The implementation process will provide an action plan for a 3-5 year period. Action plans will be updated and changed as needed. Action plans will be developed for a 3-5 year implementation period and evaluated annually to determine how to proceed with conservation efforts. Please see the new section on the Implementation Process in Draft #2 of the document (page 176).</p>
<p>The Plan states that managing for sustainable economies is a conservation approach that guides the Plan. CDOW’s definition of a sustainable economy would be quite helpful.</p>	<p>The implementation process will allow stakeholder input on which strategies will be implemented and what impact they may have on the local economy and environment (see Implementation Process in Draft #2 of document page 176).</p>

Though “civic environmentalism” is an admirable concept, Gunnison County believes it is unlikely to be achieved with prairie dog species, considering the past perceived and real conflicts between prairie dogs and man.	We removed this definition from the plan. We are now conducting a new Implementation Process to involve stakeholders in the implementation of strategies on the ground. See Implementation Process in Draft #2 of the document (page 176)
I disagree with the statement: “The GUPD and WTPD Conservation Assessments suggested a range wide decline in populations and occupied habitat for both GUPDs and WTPDs. However, population and habitat declines were not quantified due to the following:...” A statement like that should be taken out of this document, because there is no science to back this up. On page 131, under G. it is quoted the following: “Accurately assessing the status of GUPD and WTPD populations has been impossible due to the lack of complete and consistent survey, variable time period between estimates at specific sites, and a lack of standardized monitoring techniques to evaluate long-term population trends.” We cannot say in this document the prairie dogs are on decline when we do not have an accurate count or monitoring of the population.	Large areas of prairie dog occupied acreage have been lost in Colorado, e.g., South Park and Little Snake. We based our assessment on these obvious declines without new colonization. Smaller, less obvious declines cannot be quantified due to issues identified with mapping efforts. Until variation between mapping efforts can be described and compensated for, mapping can only provide a gross approximation of dog occupied acres. These gross approximations, however, are meaningful in areas that have experienced significant declines or increases. In areas where changes have been less extreme, mapping cannot produce comparable results.